

Your Voice In Europe: ROADMAP feedback for Communication: Strategy on Plastic in a Circular Economy (including action on marine litter)

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Related document: Communication: Strategy on Plastic in a Circular Economy (including action on marine litter)

Feedback:

NABU is welcoming the roadmap for a Strategy on Plastics in a Circular Economy but calls for broadening the view from end-of-pipe environmental problems such as GHG-emissions, marine or land-sourced littering and weak recycling targets.

Some major problems are listed in the first paragraph starting with “Plastic is an important material for our economy” but discussed solutions are not yet focusing on measures for the production sector. Major plastics producers, converters and B2B customers are EU-based. A strategy that regulates and standardizes the procedures and processes of these companies will have an influential potential to help tackle the global plastics problem.

NABU calls for the discussion of a holistic policy-mix with the new strategy, including economic instruments, plastics application standardizations, reuse and remanufacturing minimum targets and other eco-design tools. The policy-mix should not only develop a roadmap on how to make plastics more valuable for producers and consumers but also find possibilities to reward ground-breaking systemic changes (such as from single to re-use systems or massive reductions of plastics without negative substitution effects).

Furthermore the roadmap needs to engage plastic (waste) prevention, e.g. through setting minimum quality characteristics for the design of short living plastic products such as single use toys. Additionally the PPWD shall be opened for more bans on plastic products/packaging types than the single use plastic carrier bags.

A Strategy on plastics should additionally focus on the issues of transparency and the availability of data. Producers and converters need a strong motivation to report towards EUROSTAT on production of plastics types and their specific application, recipes, recyclability (e.g. for multi-layer plastic products) and if applicable biodegradability.

Through transparency it might be possible to tackle various problems such as toxicity of additives on human health and the environment or micro plastics through abrasion and dissipative losses.

Feedback file: