

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

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- Size : select
- Publication : can be published with your personal information

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

Feedback:

Legambiente considers plastic strategy a very important step toward circular economy and waste prevention. We agree with the setting and the good directions suggested in this roadmap: reducing our dependency on virgin fossil fuel and related CO2 emissions, remediate the low rate of recycling and reuse, and address the significant leakages and pollution of plastics in the environment, in seas and freshwaters. But it's important to underline that roadmap doesn't address clear operational directions and specific instruments to reach the objective good intentions of the strategy. In particular about plastic prevention and excessive packaging and disposable plastic items e.g single use plastic cutlery. Prevention should also be prioritized when it comes to avoidance of harmful virgin or recycled materials to be placed on the market, being for their toxicity on human health and the environment or their pollution impact. These aspects of prevention and reuse should be more clearly linked to producer responsibility, targeting littering, but going beyond it. The roadmap is not setting a clear enough vision that the future of plastic materials should rely on recycled plastics as the main feedstock for new applications with associated consequences in terms of material innovation, business models and product design for prevention and recycling, recycling technologies and radical de-toxification. Supporting research and developments and scaling up good experiences should also be made more prominent.

Another very important issue is bio-plastics. It is important to determine set conditions and criteria for the development of bio-plastics towards the most relevant applications. Bio-plastics is an important solution to substitute not renewable crude oil plastics, and they can help address this challenge. Bio-plastics have also a very important role in the circular economy, for example: reusing biomass waste; replacing not recyclable or not recycled materials in certain application (for which their biodegradability could be seen as an advantage compared to today's situation), like compostable plastic bag to help collect biowaste separately or other uses (food packaging? fishing gear?). To achieve these goals

they should be compatible with sustainable biomass usage and not conflict with priority usage of biomass, land and eco-system preservation; they should not be impact negatively the recycling systems and It's important that biodegradability argument should not be an excuse to lead to more lenient behavior with regards littering.

Generally, the roadmap also misses the importance of new messages and nudging towards end users to change today's consumption patterns.

Feedback file: