

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:

The European Commission's Strategy on Plastics should stimulate both the development of practical solutions for today and innovations that will drive an increasingly circular, resource efficient and competitive Europe for the future. At the same time the strategy should support the shared aim of preventing the leakage of any waste into the environment. The approach to meet these objectives should be based on three guiding principles:

- *Full life-cycle thinking*
- *Environmental protection and societal well-being*
- *Awareness building*

This will allow the industry to provide the optimum balance of best options in terms of: product performance; benefits to the consumer; resource efficiency and overall greenhouse gas emission reductions.

A more detailed explanation of PlasticsEurope's views is available at <http://www.plasticseurope.org/strategy.aspx> and is also herewith attached.

However, additional elements should be taken into consideration, while evaluating possible actions which aim to achieve those priority objectives of the Strategy which have been identified by DG GROW and DG ENV.

Alternative Feedstocks

The industry works continuously to improve plastics manufacturing through the development of more resource efficient processes and the minimisation of environmental impacts. It has also been exploring the possibility of diversifying feedstock sources, such as deploying renewable biomass and chemical recycling (which involves converting plastics waste back to basic chemical building blocks), together with the use of CO₂ as an alternative carbon source for the production of hydrocarbons.

Also, a considerable reduction of GHG emissions across the entire economy is currently achieved through the use of plastics in a diverse range of applications, such as: plastics packaging (which increases the shelf-life of resource-intensive foodstuffs); lightweight cars and airplanes and insulation within buildings. The CO₂ savings achieved in the use phase of these examples greatly offsets the GHG emission of the original resin production phase. Therefore the following aspects should be borne in mind:

- Life-Cycle Assessments and Cost-Benefit Analyses are particularly important in this area, and are indispensable tools to assess whether an overall reduction of GHG emissions is achieved.*
- To contribute to these efforts, the stimulation and mobilisation of public and private funding for Research and Innovation focused on the development of alternative feedstocks – such as those obtained from the chemical recycling of mixed plastic waste or from renewable sources – is a key enabler.*

Plastics reuse and recycling

We acknowledge the need for developing and expanding the use of recycled plastics to improve circularity. For that purpose, public funding should be used to invest in the improvement of waste management systems, including separate collection systems for packaging and improved sorting, which in turn will increase the availability of recycled materials and favour subsequent uptake. The EU legislation on waste needs to be transposed and properly enforced at national level without delay. A landfill ban on recoverable post-consumer plastic waste would prompt the improvement of waste management infrastructures.

Reducing plastic leakage into the environment

PlasticsEurope and its member companies alike continue to stress that, whatever its origin, plastics leaking into the environment is unacceptable. Since the complex and global causes of marine litter cannot be solved without a joint effort of all stakeholders, the plastic industry has been establishing partnerships to drive actions at both European and global level.

With regard to the potential loss of plastics pellets, the industry is strengthening the enforcement of its own stewardship programmes, especially that of Operation Clean Sweep®. This initiative is promoting proper pellet containment along the full plastic value chain – including producers as well as logistic chains and downstream users – by exchanging knowledge and best practice on how to improve site processes and motivate responsible behaviour of all employees.

Policy-makers and authorities can achieve a reduction in the amount of plastic leaking into the environment by:

- Implementing efficient waste management systems, also engaging with other countries to achieve the same objective, and by enforcing legislation through appropriate and dissuasive fines.*
- Making citizens and consumers aware of the benefits and the value of plastics: education is a key factor in bringing about the behavioural change which will prevent irresponsible littering by citizens.*
- Encouraging the smart design of products which take resource efficiency gains and the reduction of litter into consideration.*

PlasticsEurope is confident that the European Commission will carefully consider how a constructive engagement with industry and all the relevant stakeholders is the essential element in establishing a forward-looking, innovation-oriented Strategy on Plastics. We would also like to stress that:

- Enhanced public-private dialogue positively contributes to the fitness, appropriateness and proportionality of legislation. At the same time, regulatory certainty and stability allows for the necessary long-term investment commitments.*
- Responsibilities should be allocated to the different sectors of society in the most appropriate manner.*
- Supporting value-chain platforms and collaborative forums will help with the implementation of the Strategy. These cooperative platforms should nurture innovation aimed at improved resource efficiency; for instance, appropriate eco-design with plastics could lead to greater retention and reuse of resources within a circular economy.*

Feedback file:

[PlasticsEurope ViewsonaStrategyonPlastics.pdf](#)