

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:

SRI represents the private Swedish Recycling companies collecting and recycling all type of materials. Plastic is an important fraction. We have member companies collecting and recycling plastic materials, producing products from recycled materials, repairing plastic products, converting the plastics (and rubber) that cannot be recycled to feedstocks through pyrolysis processes. We have also members using non-recyclable plastics to replace coal in cement kilns and thereby reduce their GHG emissions significantly.

To increase plastic recycling and to a quality that can be recycled several times there is a need to take a holistic circular economy approach on the whole value chain. Design for recycling is crucial, as well as development of a well-functioning markets for recycled plastics, to be able to compete with virgin materials. Legal requirements to sort the plastics before incineration is also needed to avoid incineration of recyclable plastics.

1)High dependence on virgin fossil feedstocks

The market for plastic recycling and plastic as a secondary raw material is, compared to more mature material markets like paper, ferrous and nonferrous scrap, still under development and needs therefore more support from a political level.

Our view is that plastic recycling can be drastically increased and in the longer perspective only a small fraction needs to be incinerated in conventional waste incineration plants for district heating and electricity.

Material recycling directly to new plastic products is the preferred option, but for mixed plastics and plastics that are hard to recycle there are new technologies like pyrolysis and gasification to feedstocks that are very promising. These technologies

need market pull measures to be able to compete with waste incineration.

There is an urgent need for market incentives for the use of secondary raw materials from plastics, produced by mechanical or feedstock recycling. To develop a well-functioning internal market within the EU these goals and incentives should preferably be cross border economic instruments. The economy to improve plastic sorting and recycling today depends on the alternative costs for the waste handling like waste incineration (in some countries landfill). With the lack of incentives for demand of the recycled plastics as a raw material the alternative waste treatment methods have a huge influence on the market and thereby limit the possibilities to fulfil the waste hierarchy. Legal requirements to sort the recyclable plastics is an important measure to take but must be followed by stronger incentives to boost the secondary raw material market.

One very important EU initiative that we strongly support is the Renewable energy directive that includes waste-based fossil fuels in the minimum share in the transport sector. We urge the Commission to propose similar incentives for secondary raw materials so they become the preferred choice and can compete with the virgin materials on the market.

For plastics that cannot be recycled but incinerated our view is the plastics should preferably be used to reduce GHG emissions and as far as possible replace fossil fuels, e.g. in the cement industry.

*2)Low rate of recycling and reuse of plastics
See the answer above.*

The main focus today is on the recycling goals. To be able to fulfil these goals, and secure the use of secondary raw materials several times in high quality applications, there should be goals also for the use of secondary raw materials. We realize that this is much more difficult. However it should not be a hinder for setting such goals. We propose that the Commission look into the different possibilities to create a market by setting goals and introducing market incentives for increased use of secondary raw materials. One step could be to introduce it in the EPR schemes, and give those companies benefits that use secondary raw materials.

Innovative new recycling processes like pyrolysis, gasification and other processes that have the main purpose to produce feedstocks should be defined as material recycling, also if part of it is used for fuels in the transport sector or energy production. They should be equally treated in the waste hierarchy with using food waste in anaerobic digestion to produce biogas (used for transport fuels and energy production) and compost.

3)Plastics in the environment

It is very important that plastic products from renewable sources are recyclable and are not mixed with biodegradable plastics. There is sometimes a confusion. Biodegradable plastics should only be used for certain application and kept separate to avoid contamination with recyclable plastics.

The most important aspect to avoid plastic leakage is that all people understand that plastics as well as many other waste materials are resources. We need a mindset shift in the circular economy which must be driven by all member countries. Such mindset shift will lead to higher recycling rates. A push for mindset and behavior changes are often forgotten and need to get more focus as an important measure.

Feedback file: