

Position Paper

UEAPME¹ position on the communication from the Commission to the European parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, “A European Strategy for Plastics in a Circular Economy” COM(2018) 28 final

Executive summary

- UEAPME welcomes the EU plastics strategy. Key elements should be awareness-raising campaigns aimed at changing the way European society deal with plastics, the upgrade of collecting and recycling systems in the Member States as well as the regular availability of high quality secondary raw material in the quantity required and at reasonable prices
- Implementing set targets in the waste sector should consider technical feasibility and practicability of solutions. New legislation stemming for the plastics strategy should be based on a holistic approach: key elements are the analysis of the ecological impacts of products used as substitutes as well as the socio-economic benefits of the plastic products to be replaced, such as single-use plastics
- EPR schemes have to be adapted to SME manufacturers with no discrimination. SMEs should benefit from capacity building measures to join EPR schemes financed through the fees levied from firms joining the systems. EPR schemes should also be applied to goods imported into the Internal Market in order to avoid competitive disadvantages for EU producers.
- Preventing and reducing plastics litter in the oceans is a priority but, to be successful, it requires international cooperation with serious commitments and targets, just as the fight against climate change

In general, UEAPME welcomes the strategy for plastics recently published by the European Commission. It represents a further step towards a "European recycling society". The European Commission positively recognizes the requirement for a common approach - from the manufacturer to the consumer - which is needed to realize a plastic cycle.

However, for further developing the concept of recycling society an overall approach would be necessary: first of all, a prerequisite would be extended information and awareness raising campaigns at EU and Member State level on how to manufacture, use and dispose of plastics, which should determine a change of mentality in our society.

¹ UEAPME subscribes to the European Commission's Register of Interest Representatives and to the related code of conduct as requested by the European Transparency Initiative. Our ID number is [55820581197-35](#).

Secondly, the collection and treatment of waste in the Member States should be upgraded in order to deliver enough secondary raw material to allow a reduced use of primary material, thus diminishing the dependency of the EU and contributing to circular economy flows. Moreover, to push the use of recycled plastics, manufacturers in the EU should be able to count on high quality secondary raw material which is regularly available in the quantity required and at reasonable prices. This could be achieved through the use of European and international quality standards.

Safeguarding the principles of technology and material neutrality is also a key. Otherwise, there is a risk of triggering unintended consequences on competing materials and technologies. Thus, the strategy should also take into account the interactions and market mechanisms, and in particular the impact on the whole packaging value chain.

The European Commission draws an image of a new plastics industry for Europe, which is certainly positive, but very ambitious. When realizing set targets, one should consider technical feasibility and practicability of solutions. Regarding the revision of the packaging directive, it is of utmost importance to foresee applying these requirements consistently in all Member States as well as to imported goods from third countries. This should be particularly taken into account when realizing the goal of ensuring that all plastic packaging is recyclable by 2030. Additionally, the proposed legislative initiative for single-use plastics has to be based on a holistic approach. The analysis of ecological impacts of products used as substitutes is a key element. Likewise, the socio-economic benefits of single-use plastics have to be considered.

UEAPME is prudent towards the idea that some forms of extended producer responsibility (EPR) have been identified as a (financial) solution for many fields of actions laid down in the strategy. In order not to be an excessive administrative and financial burden, SME manufacturers, and particularly micro enterprises, should benefit from capacity building and permanent coaching from business organisations on how to be involved in and to contribute to these EPR systems. This activity could be financed through part of the fees paid to the EPR consortia by the firms joining their systems. Moreover, these systems should be structured in a way that SMEs are not treated in a discriminatory way compared to big businesses (for instance as far as the amount of Euros paid for ton of waste is concerned).

Another aspect is the avoidance of distortion of competition in the internal market, which means that it should be ensured that these EPR should be subject to a mandatory implementation in the different Member States. Furthermore, it is questionable to what extent manufacturers of goods and products established outside the EU can be included in producer responsibility systems in practice. This bears a risk of competitive disadvantages for EU producers. Therefore, measures based on extended 'producer responsibility' for imported goods should also affect the importer or the person who provides the goods on the European market.

Most evidently, it is of utmost importance to prevent marine litter that endangers ecosystems, flora and fauna. Therefore, UEAPME welcomes the global approach by the European Union. At the same time, there are still large differences in waste management schemes within the Member States of the European Union.

For example, there are major differences in wastewater management – which plays an important role in preventing the release of microplastics - within the EU.

In this context, it has to be highlighted that an effective action to reduce plastic litter in the world's ocean can only be achieved successfully if tackled worldwide, since plastics is used everywhere. In a few words, this objective is similar to the one of fighting climate change. A single EU initiative will not give great results. International cooperation with clear targets and commitments is a prerequisite.

In the Annex to the Plastics Strategy, the European Commission identifies 39 measures that are currently work in progress/ or that it will work on in 2018. Many of those measures could certainly create positive effects, such as new ways of collecting and sorting or considering public procurement. However, as many measures seem to be still vague, it is not yet possible to analyse any impact. The same applies to the 23 recommended measures for national authorities and industry proposed by the European Commission. It is not yet clear if any of them will be considered or even implemented by Member States. In any case, efforts should be made to ensure uniform application within the EU so as not to disturb the single market.

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