

Alternative Questionnaire Submitted to the European Commission

Stakeholders are invited to reply to the following questions. All answers will be published on the European Commission web site, unless stakeholders clearly mark their submission as confidential.

We thank you for your kind cooperation!

1 THE RESPONDENT

1.1 Do you reply as:* (compulsory)

(at most one answer)

- ☐ citizen
- ☐ public authority
- ☒ **an industry association**
- ☐ an NGO
- ☐ a university
- ☐ other

2 REDUCTION OF LITTER IN THE ENVIRONMENT

2.a Can the European Union play a constructive role in reducing littering and the presence of litter in the environment?*(compulsory)

(at most one answer)

- ☒ **Strongly agree**
- ☐ Agree
- ☐ Disagree
- ☐ Strongly disagree
- ☐ No opinion

2.b Please make recommendations for action and provide insofar as possible quantitative data, particularly concerning social, economic and environmental impacts, in support of your answer

(maximum 2000 characters)

The presence of waste in the environment (urban, rural or marine) impacts all EU States. This is due either to inadequate waste management legislation/systems/practice at local level or to careless or deliberate disposal of waste in the environment by individuals or organizations.

The Union is successfully involved in harmonization of waste laws. Greater attention might be paid to proper implementation and policing of such rules. However, the challenge is essentially for national and local authorities to address on the ground.

As for careless or deliberate release of waste/littering in the environment by individuals or organizations, the EU might play an important constructive role in assessing the issues, obtaining the quantitative data, facilitating exchange of best practice and providing support to projects designed to identify the best solutions to local situations. The EU could play a role in pro-actively bringing together relevant stakeholders to this end, such as national and local authorities, industry and commerce, civic society groups and others.

2.1 Prevention Targets

2.1.1 Do you agree that the establishment of litter prevention targets can provide for a significant reduction of the incidence of littering and the presence of litter in the environment? (compulsory)

(at most one answer)

- ☐ **Strongly agree**
- ☐ Agree
- ☐ Disagree
- ☐ Strongly disagree
- ☐ No opinion

2.1.2 If you agree or strongly agree, kindly specify at which level such prevention targets should be established?* (compulsory)

(more than 1 answer possible)

- ☐ **EU level**
- ☐ **National level**
- ☐ **Regional or local level**
- ☐ No opinion

2.1.3 In your view, how should such targets be defined? (optional)

(maximum 2000 characters)

Obtaining agreement on an EU litter reduction target may be too ambitious in practice and may simply be superfluous unless a global agreement were to dictate this.

However, before being able to define targets at all at any level it is essential that a common measurement methodology be developed for assessing the presence/incidence of litter in the environment. To our knowledge, different national organizations active today in the field of litter and littering use different techniques for measuring/recording litter.

Once a common methodology is developed, more effective measurement could be made, leading to a clearer assessment of the scale of the problem at local/national levels. At that moment in time, a structured debate might usefully be launched on how best to set targets. Of course, targets alone are not enough; effective anti-littering/litter control techniques are required and clear responsibilities defined at local level involving relevant stakeholders.

2.2 Product bans

2.2.1 Do you agree that an EU ban on specific products or particular types of products that frequently appear as waste in the environment is needed?* (compulsory)

(at most 1 answer)

- ☐ Strongly agree
- ☐ Agree
- ☐ Disagree
- ☒ Strongly disagree
- ☐ No opinion

2.2.2 Please, provide insofar as possible quantitative data, particularly concerning social, economic and environmental impacts, in support of your answer as well as the need to define specific exceptions.

(maximum 300 words) (maximum 2000 characters)

We cannot agree to a blanket answer that such bans are effective or appropriate. In most cases, we would expect such bans merely to result in the littering of substitute or alternative products and the increased incidence of those products in the environment as litter. All stakeholders should work together to improve waste management systems and to change attitudes and behavior in society.

As for quantitative data, we suggest that the European Commission might usefully dedicate resources towards obtaining first the social, economic and environmental impacts data before moving to action.

2.3 Pricing Measures

2.3.1 Should pricing measures be used to effectively reduce the use of products that frequently appear as waste in the environment?* (compulsory)

(at most 1 answer)

- ☐ Strongly agree
- ☐ Agree
- ☐ Disagree
- ☒ **Strongly disagree**
- ☐ No opinion

2.3.2 In your view, at which level should such pricing measures be defined?* (compulsory)

(at most 1 answer)

- ☐ EU level
- ☐ National level
- ☐ Regional or local level
- ☒ **No opinion**

2.3.3 What are in your opinion the optimal conditions for such measures to achieve the objective of waste reduction? (optional)

(maximum 2000 characters)

We do not believe that there is evidence to suggest that “optimal conditions” ever exist for artificially intervening in the market via price mechanisms to reduce waste. The smartest approach is to change attitudes and behaviour towards waste and littering to (a) avoid uncontrolled waste occurring in the first place; and, (b) ensure that resources that can be recovered in whatever way are not categorized as waste.

In general, we submit that it is not helpful, in the current climate of greater attention to resource efficiency, to pursue policy that seeks to prevent waste by eliminating the source product from the market when the real solution is to seek to capture the item at end of life and recover the resource.

3 BIODEGRADABILITY AND COMPOSTABILITY REQUIREMENTS PACKAGING DIRECTIVE

3.1 In your view, are the current requirements on compostability and biodegradability in the Packaging Directive appropriate?* (compulsory)

(at most 1 answer)

- ☐ Appropriate
- ☒ **Partially appropriate**
- ☐ Inappropriate
- ☐ No opinion

3.2 Do you believe it should be clearly established that only those materials that biodegrade in natural conditions (ie. on soil, in freshwater and/or in the sea) are to be called biodegradable?*(compulsory)

(at most 1 answer)

- ☐ Strongly agree
- ☐ Agree
- ☐ Disagree
- ☐ Strongly disagree
- ☒ **No opinion**

3.3 Please, provide insofar as possible quantitative data, particularly concerning social, economic and environmental impacts in support of your answer (maximum 300 words)

(maximum 2000 characters)

NO COMMENT AT THIS TIME

3.4 In what other way could these requirements be improved? (optional)

(maximum 2000 characters)

NO COMMENT AT THIS TIME

3.5 Do you agree that a mandatory EU labeling or marking system should be introduced to increase the visibility of biodegradable packaging products to consumers?*(compulsory)

(at most 1 answer)

- ☐ Strongly agree
- ☐ Agree
- ☒ **Disagree**
- ☐ Strongly disagree
- ☐ No opinion

3.6 If you agree or strongly agree, what should a mandatory EU labeling or marking system indicate? (optional)

(at most 1 answer)

- ☐ Biodegradable packaging products
- ☐ Non-biodegradable packaging products
- ☐ Both
- ☐ *No opinion*

3.7 If you disagree or strongly disagree, please explain why

While we fully understand (a) that there is a high degree of ignorance among many consumers; and (b) that, partially as a result of this, there is a high degree of confusion among many consumers as to the nature of certain packaging materials and what to do with certain packages made from such materials.

However we submit that there are vital issues to consider before launching into a labeling scheme.

Firstly, great care should be taken not to convey the impression to consumers that it is feasible/desirable/acceptable to dispose of some types of packaging in the environment. In all cases this will not resolve the problem of littering by citizens or organisations and in most cases neither will this address the environmental challenge in an adequate manner.

Secondly, a labeling scheme will only be truly useful if appropriate waste management solutions are available to deal with differentiated products. Again, to avoid consumer confusion when appropriate solutions are not available locally for labeled goods, more effort would need to be placed in this area first. In this context, more work is required into understanding how best to communicate about products which may/may appear to be more sustainable options but may not necessarily be biodegradable in the environment.

4 ADDITIONAL COMMENTS

4.1 Additional Comments (optional)

(maximum 2000 characters)

We urge the Commission to complement this consultation with a multi-day hearing to hear and debate the issues with stakeholders.

It is essential not to take narrowly focused initiatives in this area which have the potential to erode or dismantle the material neutrality principle enshrined in Directive 94/62/EC on Packaging and Packaging Waste, thereby producing negative impacts on other vital packaging types, packaged products and the whole EU single market.