

From: [REDACTED]@ebpcouncil.eu>
Sent: vendredi 11 mai 2018 16:50
To: [REDACTED] (ENV)
Cc: [REDACTED] (ENV); [REDACTED] (SANTE); [REDACTED] (ENV)
Subject: RE: Single Use Plastics - Plastics Strategy

Dear [REDACTED]

I have seen a copy of the version of the SUP. Are you able to provide some justification or indications as to why balloons have been included? It would be very much appreciated.

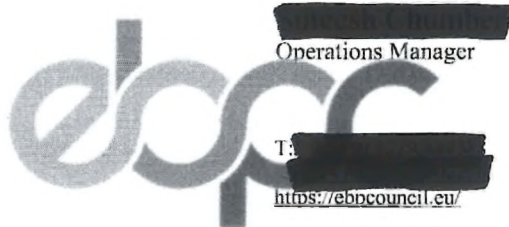
I am afraid I have to disagree with balloons being included in the Annexes. As you are fully aware, the category of natural rubber latex polymers and synthetic polymers have completely different properties, it is not available on top 10 litter items on beach reports from Ospar, and balloon sticks and balloons should have been separated in categories since they are different materials.

Contrary to what you find on social media and in the news, all the evidence suggests otherwise.

Are you available for a brief discussion call so I can better understand the inclusions?

Regards,

[REDACTED]



9 Stortford Hall Industrial Park, Dunmow Road
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From: [REDACTED]
Sent: 05 April 2018 17:26
To: [REDACTED]@ebpcouncil.eu>; [REDACTED]@ec.europa.eu
Cc: [REDACTED]@ec.europa.eu; [REDACTED]@ec.europa.eu; [REDACTED]@ec.europa.eu
Subject: RE: Single Use Plastics - Plastics Strategy

Dear [REDACTED]

I just wanted to follow up on the current situation regarding a proposal.

Can you advise if items for SUP have been selected, are you able to share any information on potential impact of balloons and toy sector and timescales?

Looking forward to hearing from you,

Many thanks



Operations Manager

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From: [redacted]@ebpcouncil.eu>

Sent: 02 March 2018 17:19

To: [redacted]@ec.europa.eu

Cc: P [redacted]@ec.europa.eu; [redacted]@ec.europa.eu; [redacted]@ec.europa.eu

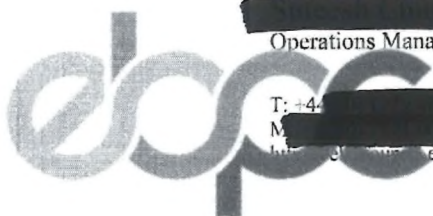
Subject: RE: Single Use Plastics - Plastics Strategy

Hi [redacted]

You are very welcome. I would say 'enjoy' your weekend but it looks like you may be working.

From a very cold and snow-filled UK!

Best wishes,



Operations Manager

T: +44 [redacted]
M: [redacted]
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From: [REDACTED]@ec.europa.eu <[REDACTED]@ec.europa.eu>
Sent: 02 March 2018 17:16
To: [REDACTED]@ebpcouncil.eu
Cc: [REDACTED]@ec.europa.eu; [REDACTED]@ec.europa.eu; [REDACTED]@ec.europa.eu
Subject: RE: Single Use Plastics - Plastics Strategy

Dear [REDACTED]

Thank you very much – well appreciated.

We will be analysing these over the weekend, and will come back to you if needed,

Best regards,

[REDACTED]
European Commission - DG ENV - B1
+32 [REDACTED]

From: [REDACTED] [mailto:[REDACTED]@ebpcouncil.eu]
Sent: Thursday, March 01, 2018 8:19 PM
To: [REDACTED] (ENV)
Cc: [REDACTED] (ENV); [REDACTED] (GROW)
Subject: RE: Single Use Plastics - Plastics Strategy

Dear [REDACTED]

I am supplying some information for your research as promised. Please ensure I am aware of any information from this which may be published so I can ensure we cover the correct confidentiality – if required. I hope it is of help.

I have tried to look into the volume of latex balloons manufactured and sold in Europe and make the following estimates. Please note – these are estimates and educated assumptions have been made about the shares and market. There are 2 scenarios:

1. Latex estimates to estimate the volume of balloons manufactured, assuming the supply is meeting demand, calculated from tonnes of latex used. This was done by asking some questions to suppliers and estimating what share of the market our members hold and extrapolate what the European market may look like. There are some balloon and party industry reports but these are largely inaccurate.
2. Some estimate of the size of the market based on sales – from a 'Regioplan' report provided by Ernst & Young in 2014 to collaborate the figures from 1.

1. Latex estimates

- EBPC has the 5 largest latex balloon manufacturers in Europe (possible the world).
- In total, the global tonnage of latex, according to latex suppliers, used for all balloon manufacturers across the world is approximately 100k T wet latex.
- If we are to estimate how much of the global latex balloon market is in Europe, we would estimate between 20-25%.
- We do not currently know what China may be importing into Europe in terms of balloons. There are many independent importers and distributors.
- Since these are wet tonnages, dry tonnages require a factor of 60% applied since the remainder is water.

Latex Balloon estimates

There are many sizes of balloons, but we claim the average balloon weight is considered to be 3 grams.

100k wet latex = 60k T dry rubber latex global

60k T / 3g = 20 bn balloons global (with average weight of 3g per balloon)

If European market is worth 20-25%:

20k T wet = 12k T dry rubber latex Europe, 12k T / 3g = 4 bn balloons (with average weight of 3g)

25k T wet = 15k T dry rubber latex Europe, 15k T / 3g = 5 bn balloons (with average weight of 3g)

So 4 bn – 5 bn latex balloons sold in Europe by our manufacturers. I would say these manufacturers have between 50% - 75% (likely 50%) of the market between them. So 4bn – 5bn balloons is estimated could be somewhere between 50% - 75% of the EU market for latex balloons.

2. Regioplan – Ernst & Young

Secondly, once I had determined section 1 above, I then tried to justify if the figures might be correct using cross check against a Regioplan report from 2014 (attached market size from report).

According to my research and the average price of a balloon researched on Amazon (for top 5 members):

- I estimated the same size balloon, in varying size of packs had an average price of 0.23p per balloon
- 8 bn balloons at average of 0.23p per balloon = €1.84 bn market Europe wide (members and third party importers)
- 10 bn balloons at average of 0.23 p per balloon = €2.3 bn market Europe wide (members and third party importers)

The Regioplan report examines 'The contribution and role of balloons in Europe' and was commissioned by EBPC, to understand the market and impact, as independent research by Regioplan and Ernst & Young to understand the impact of balloons and what the size of the market could be. From this report, I attach the size of the industry in Europe (not including Turkey or Russia) estimated to be:

€103m UK, €80m Germany, €49m Italy, €208m other EU member states. Russia is €104m, Turkey is €26m in addition to the EU. It was also noted that from a survey of over 7000 people, 84% of consumers are discarding their balloons correctly along with household waste, likewise, do not release balloons into the atmosphere.

The revenue figures for market size above are based on responses to a questionnaire from 8 large European companies, and four companies with offices in Europe but based outside the EU and active worldwide. They were not sure how accurate these figures were since Italy was claimed to be a much larger market

according to the survey, whereas the revenue estimates points to the UK as the larger market. It is possible these figures are between a third and a quarter accurate since they only surveyed 8 of our manufacturers.

Since the report claims the market is €540m in Europe, could this mean that EBPC perhaps holds members covering 25% of the market which is in line with justification in section 1 .

We already know balloon releases have decreased significantly in the last 10 years across Europe. The EBPC also encourages all members to not release balloons – to this effect we have our own educational program since it is considered littering. The evidence for harm to animals is very little – although there are many social activist GO's who are either creating a false image (for which we have evidence) and using clever marketing tactics. We urge you to consider the facts.

Balloon sticks

Only one of our members responded who specialises in balloon accessories and provided us with the following figures for their manufacturing facility in Germany, we cannot individually claim which countries the sales occur within Europe since they also supply distributors.

- 2017: 7,7 Mio. pcs. (34.650 kg)

Of course – there are many imports also from China – we would again estimate more than 50% arrive from China and other parts of the world.

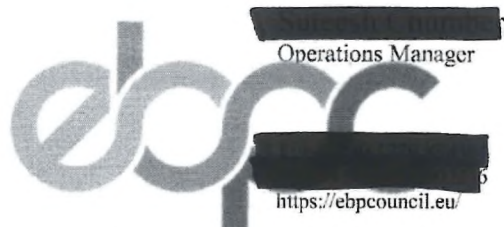
I hope this information helps – it is only estimates. Of course – it is always difficult to survey members because some are very sensitive to the market shares since they are all in competition.

We are in the middle of launching a new initiative called 'Partysafe' across the whole of Europe. We will start with 24,000 schools in the UK then roll this into all European countries, it is an education program to target children and their parents (using social media), and will also provide facts and information on balloons, party products, safe use – disposal and regulations as well as offering membership to balloon retailers and decorators so they can leverage our knowledge. This will give us a voice to shape consumer thinking (hopefully by the millions). Launching within the next few weeks it is nearly ready.

If you have any further questions we would be more than happy to investigate with a little more time.

Any questions please just ask.

Best wishes,



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From: [REDACTED]@ec.europa.eu [mailto:[REDACTED]@ec.europa.eu]
Sent: 26 February 2018 17:22
To: [REDACTED]@ebpcouncil.eu
Cc: [REDACTED]@ec.europa.eu [REDACTED]@ec.europa.eu
Subject: RE: Single Use Plastics - Plastics Strategy

Many thanks [REDACTED] this is already very helpful!

[REDACTED]
[REDACTED] S
European Commission - DG ENV - B1
+3 [REDACTED]

From: [REDACTED] [mailto:[REDACTED]@ebpcouncil.eu]
Sent: Monday, February 26, 2018 6:21 PM
To: [REDACTED] r (ENV)
Cc: [REDACTED] (ENV); [REDACTED] (GROW)
Subject: RE: Single Use Plastics - Plastics Strategy

Dear [REDACTED]

This is not information which is readily to hand since we do not have all manufacturers under our belt globally.

We have some very basic information – which I will put together for you by Thursday but it will have to be very high level at this since we have not surveyed our manufacturers for such information.

Best wishes,

[REDACTED]

From: [REDACTED]@ec.europa.eu [mailto:[REDACTED]@ec.europa.eu]
Sent: 25 February 2018 14:57
To: [REDACTED]@ebpcouncil.eu
Cc: [REDACTED]@ec.europa.eu [REDACTED]@ec.europa.eu
Subject: RE: Single Use Plastics - Plastics Strategy

Dear [REDACTED]

as already suggested in our public consultation, would it be possible to share production / consumption (both EU and non-EU) figures on balloons and balloon sticks, both in tonnes, counts and €? And possibly disaggregated by country?

It would be appreciated if you could share those figures the coming days, latest by next Thursday. It would help the analysis to see who would be affected by possible measures, and how much.

Thanks in advance for your help,
[REDACTED]

From: [REDACTED]@ebpcouncil.eu]
Sent: 22 February 2018 19:45
To: [REDACTED] (ENV)
Cc: [REDACTED] (GROW); [REDACTED] (JRC-ISPRA); [REDACTED] (ENV)
Subject: RE: Single Use Plastics - Plastics Strategy

Dear [REDACTED]

Many thanks for your quick and prompt reply.

If there is any opportunity to obtain the sources of data (Eunomia and JRC) for balloons and balloon sticks, as well as disposable cups and plates I would be very interested to see these for the industry so we may also prepare our own policies.

If you could also point me in the right direction of where I can get updates and developments of the plastics strategy that would also be very useful.

I look forward to hearing from you.

Best wishes,
[REDACTED]

[REDACTED]
Operations Manager

[REDACTED]
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From: [REDACTED]@ec.europa.eu [mailto:[REDACTED]@ec.europa.eu]
Sent: 22 February 2018 18:40
To: [REDACTED]@ebpcouncil.eu

Co [REDACTED]@ec.europa.eu [REDACTED]@ec.europa.eu [REDACTED]
[REDACTED]@ec.europa.eu

Subject: RE: Single Use Plastics - Plastics Strategy

Dear Mr [REDACTED]

we did will receive your message. I am indeed coordinating the work on single use plastics.

We are aware of the different nature of the balloons and the sticks, and we will take your input that you sent us into account in our analysis.

If we would have additional questions, we will of course contact you,

best regards,
[REDACTED]

From: [REDACTED] [sc@ebpcouncil.eu]

Sent: 22 February 2018 19:12

To: [REDACTED] (GROW); [REDACTED] (JRC-ISPRA); [REDACTED] (ENV);
[REDACTED] (ENV)

Subject: RE: Single Use Plastics - Plastics Strategy

Dear Members of EC,

Would it be possible I can have some confirmation of receiving this email, and some direction on who would be the best person to discuss this with to move this forward.

Thanking you in advance,
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
<https://ebpcouncil.eu/>

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From: [REDACTED] [mailto:[REDACTED]@ebpcouncil.eu]

Sent: 12 February 2018 16:46

To: [redacted]@ec.europa.eu [redacted]@ec.europa.eu [redacted]
[redacted]@ec.europa.eu [redacted]@ec.europa.eu

Subject: Single Use Plastics - Plastics Strategy

Dear [redacted]

I am writing in response to the current consultation for single use plastics and the plastics strategy as being devised by the European Commission. As a major industry stakeholder, we are unable to complete the questionnaire since 'balloons and balloon sticks' are merged as one item, and natural rubber latex balloons and balloon sticks have very different materials characteristics.

We feel it is important to represent the industry on behalf of all our members across Europe and to provide our position and concerns since many of our members cannot complete the questionnaire. Instead, please find attached our viewpoint on the consultation.

We would welcome an open discussion with the Commission on behalf of the industry to discuss any of our findings at a time convenient to yourselves.

I look forward to hearing your thoughts by return on how we may open a discussion for stakeholder viewpoints.

Best wishes,

[redacted]

[redacted]
Operations Manager

[redacted]
<https://cbpcouncil.eu/>

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