


SADAUSKAS Kestutis (ENV); [REDACTED] (ENV); [REDACTED]  
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2020-03-03 ENV B1 meeting EuPC on pellet loss prevention

Today, I met [REDACTED] from EuPC with the aim of preparing B1 participation in **EuPC Senior Executive Forum**. This meeting, initially scheduled on 18 March, has now been postponed to a later date - April or May.

Interesting discussion on EuPC plans and needs with regard to pellet loss prevention. Main message was: we (EuPC) ask you COM to help us persuade our individual members that they have to take urgent and concrete action to address pellet loss prevention. De facto, still a large number of individual members seem not to realize how important this topic has become at EU level. These members say “let’s wait until they decide on the EU Plastic tax”. EuPC idea was to present a **project** on pellet loss prevention and ask for a specific budgetary line for its implementation. Now that the Senior Executive Forum (around 100 converters) has been postponed (due to Coronavirus), the project may also be delayed.

In details, from EuPC:

- Members fear a multiplication of initiatives / measures targeting plastic, last but not least the EU Plastic tax.
- REACH Restriction proposal containing provisions on labelling and reporting would in any case address the problem only partially (not yet clear how companies will implement measurement and how transporters will be included in the scope, if they are to be included).
- EuPC is working with PlasticsEurope on the development of an OCS certification scheme, based on minimum requirements.
- EuPC is working to present a **project** to its members covering 1) the design of the scheme; 2) the promotion among the members; 3) a pilot project (possibly still in 2020 at around 10 companies) to quantify losses and/or pellets recovered once containment measures are in place. NB: OCS does not clarify what 'loss' means. Also, during the pilot project, NGOs would not be admitted to enter the plant, but this could be envisaged at a later stage.
- EuPC believes that once the OCS certification scheme is in place (first certifications could occur as of end 2020-beginning of 2021, but timing is very optimistic!), companies that are 'certified' under this scheme could be considered as 'compliant' by ECHA.
- Being 'certified' would mean inter alia that the producer or the converter have changed their contract with the transporters to include minimum requirements regarding pellets.
- EuPC does not believe that labelling pellets as environmentally hazardous is a viable solution (too burdensome).
- EuPC is looking at FR intention to introduce a mandatory certification scheme. Question: do we have info on these plans? I know about Scotland and OSPAR recommendations but not about FR plans.

  
*Policy officer Circular Economy and Plastics Strategy*  
European Commission  
DG Environment  
Directorate « Circular economy and Green Growth »  
Unit B.1 "Sustainable Production, Products & Consumption"

