



Position Paper

On the upcoming proposal for a European Strategy for Plastics in a Circular Economy

Introduction

Ecoembes strongly support the aim of putting forward a strategy to reduce plastic waste and raise awareness on the environmental impact that plastics has on the environment. We believe Europe has a responsibility to lead on policies to increase the levels of environmental protection and safeguard our planet's marine life. We are therefore encouraged to see that the Commission will come forward with concrete plans to improve plastic recycling, including the issue of marine litter and plastics.

Our industry is keen to continue to play a leading role in fostering the recycling efforts of Europeans, helping to minimise the effects of plastic waste in Europe, knowing that plastic is necessary in every aspect of the production cycle as the Commission notes in its plastics strategy outline. It is therefore very important to raise awareness about both the crucial role plastic plays in our society and the necessity of managing it correctly when it reaches its end-of-life phase in order to be able to benefit from its many uses while minimizing its environmental impact.

Extended Producer Responsibility (EPR) schemes for packaging waste have been at the forefront of the transition towards a circular economy for the past 20 years. We therefore welcome the Commission's recognition of EPR schemes, as a stakeholder currently providing a holistic approach to implementing the circular economy and reducing waste through efficient separate collection for plastic packaging.

Our recommendations for the Commission's Plastics Strategy

From our perspective, the strategy should tackle the following issues:

1) Improving the recyclability of products made of plastics

Products made of plastics usually include more than one polymer and often those polymers are not compatible for recycling. For this reason, the Commission should make it a key priority to find mechanisms and incentives to introduce Ecodesign measures (recyclability criteria) for all plastic products placed on the market.

2) Increase recycling rates of plastics

Improving plastic recycling rates is one the milestones of the future plastics strategy, this implies putting in place an efficient waste management systems for plastics coming from different waste sources.

In the interests of delivering the best solutions to tackling plastic waste management, we believe that plastic waste management schemes should be determined by Member States. From our experience, a specific waste management system that works well in one country may be inadequate in another. This is why we support the carrying out of a life-cycle analysis at Member State level in order to evaluate the potential benefits of the new systems.

In parallel to improving plastics recycling, a strong Research and Development strategy at EU level is also needed to find added value applications for plastic products that are currently more difficult to be recycled. Implementing mechanisms to foster its consumption such as green public procurement is necessary to effectively close the loop.

3) Curb littering

Littering is a global environmental issue that requires action from all stakeholders, including national authorities and citizens. Thanks to the development in waste management carried out in over the last 20 years, Europe now has an opportunity through the Plastics Strategy to take the lead in finding solutions to this challenge, not least by sharing its know-how and expertise with those regions that has less advanced waste programmes.

Marine litter is mainly caused by land-based litter escaping the waste treatment systems and reaching the oceans, which in some countries is a result of lack of comprehensive waste management systems while in others it is clearly related to behaviour of citizens. For this reason, tackling littering requires a double approach:

- Raising awareness on environmental protection through national education programmes aimed to commit citizens to avoid any kind of litter.
- Promoting worldwide the implementation of comprehensive and efficient waste management schemes covering all the territories while being easily accessible for all citizens.
- Marine litter is a particularly sensitive issue and extra effort should be dedicated to identify the main sources of plastics ending up in the oceans and implementing proportional and evidence-based measures to prevent it.

About Ecoembes

Founded in 1996, ECOEMBES is the Extended Producer Responsibility (EPR) system for household packaging (paper and cardboard, metals and plastics) in Spain. ECOEMBES brings together more than 12.000 producers and cooperates with 8.000 local authorities to coordinate and ensure the effective operation of the EPR system for household packaging waste to achieve the prevention, recycling and recovery targets in the most sustainable and efficient way. At EU level, ECOEMBES is a founding member of the Extended Producer Responsibility Alliance (EXPRA).