

MRES(2017)377 22

Dear Ms [REDACTED],

I would like to inform you that our colleagues in EDANA, the international association for the nonwovens, have similar concerns to the ones raised by AISE. We would appreciate it, if the invitation could be extended to them as well. I include in copy, Mr. [REDACTED], representative from the association.

Many thanks,  
Kind regards,

**From:** [REDACTED]  
**Sent:** 07 May 2018 10:18  
**To:** [REDACTED]@ec.europa.eu'  
**Cc:** [REDACTED]; [REDACTED]@unilever.com  
**Subject:** RE: Single-use plastics - A.I.S.E. comments on future proposal

Dear Ms [REDACTED],

Many thanks for your swift response.  
We would be happy to meet Mr. [REDACTED] tomorrow. Please inform us in case we would need to fill in any registration documents.

Kind regards,

**From:** [REDACTED]@ec.europa.eu [mailto:[REDACTED]@ec.europa.eu]  
**Sent:** 04 May 2018 16:43  
**To:** [REDACTED]  
**Subject:** FW: Single-use plastics - A.I.S.E. comments on future proposal

Dear Mr [REDACTED]

Our Head of Unit, Mr Hugo-Maria Shally will be happy to meet you to discuss the initiative, as requested below.

Could you please let me know, if Tuesday 8th of May at 16:00 would be suitable for you?

Afterwards Mr [REDACTED] is on holidays and he would be able to meet you only after 22nd of May.

Kind regards

[REDACTED]  
Administrative Assistant – EU Ecolabel and GPP



**European Commission**  
Directorate-General for Environment  
Unit B1 "Sustainable Production, Products and Consumption"

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**From:** [REDACTED] [REDACTED]@aise.eu]  
**Sent:** 02 May 2018 16:47  
**To:** [REDACTED] (ENV)  
**Cc:** [REDACTED]  
**Subject:** RE: Single-use plastics - A.I.S.E. comments on future proposal

Dear Mr. [REDACTED],

We have heard from different channels that the upcoming Single-use plastics may address wet wipes, and in particular propose to subject them to additional requirements.

We are highly concerned about the negative consequences of such potential decisions, and do not believe they would help in addressing the issue of littering or consumer awareness.

We would really appreciate the opportunity to raise our concerns with you, and discuss the state of the single-use initiative.

Many thanks for your feedback.

Kind regards,

**From:** [REDACTED]  
**Sent:** 27 March 2018 16:48  
**To:** [REDACTED]@ec.europa.eu'  
**Cc:** [REDACTED]  
**Subject:** Single-use plastics - A.I.S.E. comments on future proposal

Dear Mr. [REDACTED],

A.I.S.E. wishes to share with you some further views in follow-up of the meeting at A.I.S.E. on 2 February 2018 for which we thank you. As mentioned during the meeting, we welcome the European Commission's recently published initiative on a European Strategy for Plastics in the Circular Economy which we hope can deliver on the stated goals of boosting competitiveness, maintaining value while reducing waste, and enable the transition to a Circular Economy across all three pillars of sustainability.

We would like to share some insights of the sector in relation to the Commission's upcoming legislative initiative aimed at addressing the proliferation of marine litter, and limiting the presence of single use plastic items found on European beaches. The detergents industry is working continuously to improve product design and ensure plastics recycling is made easier. It collaborates with local actors to increase collection rates of its plastics packaging through Extended Producer Responsibility schemes, and other tools available, thus demonstrating the strong commitment of the sector to collection, sorting, and recycling. The industry is willing to participate in the legislative process and help define core concepts such as "recyclability".

In order to effectively help framing the discussions and tackle the issue of single-use plastics found on European beaches, A.I.S.E. considers it essential for the Commission to provide a clear definition of single-use plastics. For that purpose, the legislative proposal should explicitly refer to the plastic items in its scope, i.e. those most commonly found on beaches (whereby the top 10 items represent 77% of all litter).

In addition, a clear distinction between litter and waste as well as between single-use plastics and plastics used for other purposes should be made. Concerning our sector, typically, detergents are by nature not single-use products, their packaging would not be found on European beaches as part of a littering problem, and should therefore remain out of the scope (usually a detergent packaging is used for several weeks and disposal happens at home). Moreover, they are not identified as a major source of marine litter in the Commission's assessment.

Finally, a more general comment is on education and awareness raising to prevent the littering problem. A.I.S.E. considers that education of consumers and fishermen, and the enforcement of existing waste water treatment standards play a central role in addressing the littering of European beaches. The presence of littered items in the environment demonstrates a clear lack of consideration and/or awareness by polluters. Industry has important know-how in terms of consumer education and nudging behaviour. It can contribute to solving the issue but it should be supported in its efforts by local, national, and especially by European authorities.

Again, many thanks for your attendance to our meeting and the open discussion. We remain at your disposal to further elaborate if needed.

Kind regards,

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Head of External Affairs

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