

**From:** "[REDACTED] (CAB-KATAINEN)" <[REDACTED]@ec.europa.eu>  
**To:** "SADAUSKAS Kestutis (ENV)" <Kestutis.SADAUSKAS@ec.europa.eu>  
**Subject:** FW: BusinessEurope concerns on single-use plastics proposal

Would env like to be represented?

-----Original Appointment-----

**From:** [REDACTED] (CAB-KATAINEN)  
**Sent:** Thursday, April 26, 2018 3:32 PM  
**To:** [REDACTED] (CAB-KATAINEN); [REDACTED] (CAB-KATAINEN); CAB KATAINEN MEETING ROOM; [REDACTED] (CAB-VELLA); [REDACTED] (CAB-TIMMERMANS); [REDACTED] (CAB-BIENKOWSKA)  
**Subject:** BusinessEurope concerns on single-use plastics proposal  
**When:** 02 May 2018 15:45-16:15 (UTC+01:00) Brussels, Copenhagen, Madrid, Paris.  
**Where:** 10/286

Subject: BusinessEurope concerns on single-use plastics proposal

Dear [REDACTED],

I hope this email finds you well.

It has been brought to our attention that draft legislation on single-use plastics is currently being finalised in the Commission. We are concerned about some very far-reaching proposals, in particular the proposals to ban certain items and to have producers of selected single-use plastic products responsible for the costs of collection, transport, treatment, clean ups and awareness raising campaigns.

It is our view that:

- Rather than a ban, it is better to focus on the current voluntary pledging campaign to make plastics more circular. BusinessEurope and its members are actively pushing companies to make (conditional) pledges in this regard.
- While EPR schemes might work well in some Member States, they might not work well in others. It should be up to the Member States to decide whether an EPR scheme is the right way to go to meet the ambitious targets under the Plastics Strategy or if they prefer other measures. Furthermore, EU rules on EPR were just reviewed and still have to be transposed into national law before 2020. In addition, businesses having to comply with EPR schemes might have significantly fewer funds at their disposal to make plastic products more circular. We believe that a new discussion concerning EPR rules before the new legislative framework is transposed into national law can therefore put the success rate of the voluntary pledging campaign at real risk.
- Though the objective of the single-use plastics draft legislation is to reduce the impact of certain plastic products on the environment, business cannot be solely held accountable for the inappropriate waste disposal behaviour by others. Other sources of waste can be an inadequate municipal wastewater treatment and/or the operation of storm sewage overflows. Therefore, it is important to focus on awareness raising campaigns to reduce inappropriate disposal behaviour. These campaigns can be partly funded by business but also by society as a whole.
- Furthermore, in several Member States littering is forbidden by law. We believe that there is a potential in better enforcement of prohibition and make the person/company/intuition who litters accountable. EPR schemes cannot make industry responsible for littering. If industry is made responsible for cleaning up littering from others through EPR schemes, it would risk

significantly undermining the effectiveness of littering prohibitions.

- Only about 1% of plastic waste ending up in the oceans originates from Europe, therefore concrete international actions to prevent this from happening will likely be much more effective than a very prescriptive EPR scheme.

I would like to invite you to a meeting or a phone call to discuss these views at your earliest convenience, would you be available on either:

- Friday 27 April from 16:30
- Monday 30 April after 11:30
- Wednesday 2 May after 12:30

Thank you and kind regards,

[REDACTED]

[REDACTED]

DIRECTOR INDUSTRIAL AFFAIRS &  
ASGroup MANAGER

168 AVENUE DE CORTENBERGH  
1000 BRUSSELS - BELGIUM  
Tel : +32 (0) [REDACTED]  
Fax : +32 (0) 2 231 14 45

[a.affre@businessseurope.eu](mailto:a.affre@businessseurope.eu)<mailto:a.affre@businessseurope.eu>

[www.businessseurope.eu](http://www.businessseurope.eu/)<http://www.businessseurope.eu/>

Follow BusinessEurope on <<https://twitter.com/>>

EU Transparency register 3978240953-

79<<http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=3978240953-79>>