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## Reloop's Position Paper on the upcoming European Commission's Strategy on Plastics

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*Reloop is a platform that brings together industry, government, and non-governmental organisations to form a network for advances in policy that create enabling system conditions for circularity across the European economy.*

*Reloop welcomes the European Commission's announcement to publish a Strategy on Plastics in early 2018. This position paper aims to provide guidance and support on the development of an ambitious Plastics Strategy in order to help achieve a real circular economy of plastics and reduce its negative impacts on the environment.*

### 1. Promotion of Legislative Measures at EU Level

Despite various important functionalities of plastics, the material is causing many challenges, which need to be urgently addressed. While Reloop promotes awareness-raising campaigns, it also recognises the shortcomings of soft law.

Many stakeholders are supportive of legislative measures, including progressive actors in the private sector, some of which are also members of Reloop. These actors in the reuse and recycling sectors recognise that hard law would secure investments in existing new collection and sorting systems and enable them to get back more quantity and quality materials to reuse and recycle them again and again in their products.

In fact, Reloop is of the view that a progressive outlook and legal certainty would be beneficial for all Member States, providing new economic opportunities and creating new jobs. This is particularly true as China in July 2017 notified the WTO that it would ban imports of 24 categories of solid waste (including several plastic resins such as PET, PE, PVC, PS) by the end of 2017. This demands that the EU creates a new market for its waste plastics and that market can only be established for quality materials. <http://reloopplatform.eu/wp-content/uploads/2017/10/Sept2017-In-My-Opinion-Opportunities-amid-the-uncertainty.pdf>

### 2. Promotion of Deposit-Return Schemes for Beverage Packaging and Other Items as a Key Measure to Encourage Reuse and Plastic Waste Prevention and Address Marine Litter

Marine litter is one of the biggest challenges Europe and the world is facing and there are still low hanging fruits to help address this problem. The EU has already started to lead the way by introducing measures on plastic bags through an amendment to the Packaging and Packaging Waste Directive (PPWD), which Reloop warmly welcomes. Due to the urgency of the marine litter problem, Reloop now calls on the EU to move forward and further address the sources of marine litter.

Beverage containers are by weight and volume the most problematic item in the marine litter composition, in addition to plastic bags. Reloop therefore recommends the promotion of deposit-return systems on beverage containers. Deposit-return systems are a very effective waste prevention and reduction measure and economic incentive, which can achieve return rates of more than 90%. In addition to increasing diversion and reducing litter, deposit-return systems can play a key role in ensuring a sufficient supply of high-quality feedstock for re-processors.

The benefits of deposit-return scheme were also recognised by the G20 leaders at their June Summit in Hamburg where they encouraged countries to implement deposit schemes as one of the policy measures to prevent and reduce marine litter<sup>1</sup>. Furthermore, increased introduction and use of deposit systems was also recommended by the Interest Group Plastics (IG Plastics), a working group of the European Network of the Heads of Environment Protection Agencies (EPA Network), in its position paper<sup>2</sup> on the Plastics Strategy, as the financial incentive to return products to collection points prevents littering while at the same time ensuring high-quality recycling.

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<sup>1</sup> [https://www.g20.org/Content/DE/\\_Anlagen/G7\\_G20/2017-g20-marine-litter-en.pdf?\\_blob=publicationFile&v=4](https://www.g20.org/Content/DE/_Anlagen/G7_G20/2017-g20-marine-litter-en.pdf?_blob=publicationFile&v=4)

<sup>2</sup> <https://portal.helcom.fi/meetings/PRESSURE%206-2017-431/MeetingDocuments/3-4%20EPA%20Network%20-%20Interest%20Group%20Plastics%20-%20Position%20Paper%20on%20EU%20Plastics%20Strategy.pdf>

In addition to beverage packaging, deposit-return schemes can also be used for other items, such as fishing nets, coffee cups and mobile phones.

For all the above reasons, deposit should be included in the Commission's Plastics Strategy as a key measure to encourage reuse and plastic waste prevention and reduce marine litter. Mandating the introduction of deposit return schemes at EU level would also be in line with the subsidiarity principle, as confirmed in the legal opinion drafted by a renowned German lawyer Dr. Klinger in September 2017.

### **3. Recycled Content for Packaging**

Recycled content refers to the portion of materials used in a product that have been diverted from the solid waste stream. Introducing mandatory recycled content for packaging is the best way to radically reduce climate emissions.

Reloop recommends setting minimum requirements in packaging and other applications to improve the use of recycled content in plastic products. Reloop furthermore proposes to include wording on recycled content in the provision on essential requirements under Article 9 of the Packaging and Packaging Waste Directive (PPWD). <http://reloopplatform.eu/wp-content/uploads/2017/11/In-My-Opinion-It's-time-for-recycled-content-mandates-Resource-Recycling-News.pdf>

### **4. Phasing-Out Microbeads**

Plastic waste, including microplastics, is a huge challenge for our seas and oceans, damaging marine wildlife and ecosystems. As our oceans are increasingly filled with plastics, it also has a negative impact on human food resources and associated jobs. Reloop therefore supports developing EU-wide restrictions/bans on addition of microplastics in cosmetics and detergents as well as EPR for unintentional microplastics release.

### **5. High and New Targets on Prevention, Reuse and Recycling**

#### *a) Reuse Target*

Reloop strongly supports reuse, which should be prioritised over other waste management options further down in the waste hierarchy. The EU should require Member States to take measures to encourage the increase in the share of reusable packaging placed on the market and of systems to reuse packaging. Furthermore, Reloop supports establishing a methodology for measuring reuse with the aim of setting a future EU quantitative target for reuse of sales and transport packaging.

#### *b) Recycling Targets*

Reloop supports high recycling targets for plastics and other materials, since this is the only way investments in improving waste management systems will be made and progress towards a real circular economy will be achieved. Reloop believes that high targets will ultimately be beneficial for all Member States, providing new economic opportunities and creating new jobs.

In addition, as a way to address the marine litter issue, Reloop supports setting separate, material and product specific recycling targets, such as for plastic beverage containers/packaging, which are the most problematic item in the marine litter composition.

<http://reloopplatform.eu/wp-content/uploads/2017/10/July2017-In-My-Opinion-The-push-for-reusable-packaging.pdf>

### **6. Differentiation of Fees in the Extended Producer Responsibility (EPR) Schemes**

Reloop fully supports Article 8a of the Waste Framework Directive (WFD) on minimum requirements for EPR, as proposed by the European Commission. In order to encourage reuse of packaging, the Plastics Strategy should support the differentiation of fees in the EPR schemes at national level.

## **7. Developing a Framework for Biodegradable and Compostable Plastic, Banning Oxo-Degradable Plastic**

Reloop recognises the need to develop a EU framework for biodegradable and compostable plastics, namely by introducing harmonised rules for their definition and marking, in order to improve sorting and avoid confusion among consumers. Furthermore, Reloop supports the development of EU guidance on false claims related to biodegradability in order to prevent misleading information among consumers.

In this regard and in view of the issue of marine litter, Reloop would like to recall the 2016 report<sup>3</sup> of UNEP indicating that although bio-based plastics can be biodegradable under specific conditions in terrestrial systems (e.g. in composting plants), their rate of degradation in oceans is extremely slow. UNEP also concluded that the adoption of products labelled as 'biodegradable' or 'oxo-degradable' would not bring about a significant decrease either in the quantity of plastic entering the ocean or the risk of physical and chemical impacts on the marine environment. In addition, mixing of such plastics with normal plastics in the recycling stream can compromise the properties of the newly synthesised polymer, according to UNEP.

This is why Reloop does not support oxo-degradable plastics as it is not biodegradable and cannot be recycled in conventional plastic streams and is therefore misleading consumers. Reloop is also among the signatories of the letter from the Ellen MacArthur Foundation calling for banning oxo-degradable plastics.

## **8. EU Support for the Development of Advanced Sorting and Recycling Technologies**

The technologies for sorting and recycling are already very advanced, however many countries lack knowledge and resources to be able to adopt them. Reloop therefore calls for EU support through its various funding streams, including Horizon 2020 and cohesion funding, in order to help Member States adopt advanced sorting and recycling technologies to support the recycling value chain.

## **9. Promotion of Eco-Design**

Reloop supports the widening of the scope of the EU ecodesign legislation, which currently focuses on energy efficiency, to include also broader aspects such as those of reusability, reparability and recyclability.

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<sup>3</sup> <https://wedocs.unep.org/rest/bitstreams/11700/retrieve>