



# EUROCITIES statement on plastics strategy and single use plastics

August 2018

As city authorities, we play a key role in better collection and treatment of waste and recognise that plastics are one of the most difficult waste streams to manage. Plastics are problematic to separate according to different qualities, difficult to recycle as raw material and, when not collected, lead to environmental problems in the form of littering.

The Commission's separate strategy on plastics in a circular economy, as well as the proposed directive on the reduction of the impact of certain plastics products on the environment is promising. However, to tackle environmental problems and better resource management of plastics, we recommend:

- widening the scope of the single use plastics directive and extending it to a greater range of plastic products to reinforce a shift from a recycling based approach to a prevention based one
- extended producer responsibility (EPR) schemes that gives industry more responsibility regarding investments and waste management process costs, while enabling stronger cooperation between all stakeholders in the value chain
- clear definition of biodegradable plastics and restriction of their use where biodegradability has a specific purpose
- setting reuse targets for multi-use packaging

## Prevention of plastic waste

The way we design, produce, consume and discard products of plastics is not in line with the concept of a circular economy.

We welcome the approach taken in art. 4 and art. 5 of the directive on the single use plastics, reducing consumption and the restrictions on placing certain products on the market. We believe the measures proposed for the products listed in the annexes of the directive could be expanded to other plastic products and further reduce the amounts of plastic littering and marine debris.

Unfortunately, the measures in art. 6 are not ambitious enough as more action should be taken to strengthen the market for refillable beverage packaging. The focus on the caps of single use plastic beverage packaging fails to take into account waste prevention.

We strongly encourage the Commission to take a more ambitious approach towards the responsibility of the industry for producing and inputting plastic on the market through EPR.

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## Improving plastic recycling

Too little high quality plastic waste is collected or separated from residual waste, and much of the separated plastic material is lost during the recycling process,

The use of numerous additives and multi-layer plastics, the number of polymer types, and (carbon) black plastics prevent the circularity of such material, increasing the recycling costs and reducing the supply of high quality secondary post-consumer plastics. More secondary high quality plastic material, without hazardous substances, needs to be made available as a resource for industry to meet the proposed recycling rates for plastic packaging waste and municipal waste in the revised waste directives.

- Cooperation for better design

Information about what is required for a packaging or product to be recyclable is not common knowledge to all stakeholders of the plastic value chain. The lack of cooperation amongst stakeholders hampers the development of design solutions that facilitate recycling. We welcome the Commission's proposal of using EPR as a measure to achieve stronger cooperation across the entire product value chain, including city authorities.

We encourage the development of EPR schemes where plastic producers cover the full costs of the waste management process as already proposed for certain plastic products by art. 8 of the single use directive, encouraging more ambitious recycling design.

We recommend establishing a European recycling forum with all stakeholders in the value chain to discuss and agree on 'design for recycling' guidelines for plastic packaging and other large volume plastic products. The procedure for developing guidelines could resemble the best available techniques reference documents. All stakeholders should commit to using the guidelines for products.

- Collection and recycling

The plastic strategy correctly highlights the need for an increased demand for secondary plastics as input for new production. We welcome the Commission's pledging campaign<sup>1</sup> to meet the quantitative objective of re-inserting ten million tonnes of recycled plastics into new products on the EU market by 2025.

While recognising that local authorities can, through public procurement, help create a demand for secondary plastic materials, we stress that the main responsibility for this lies with the plastic industry itself. Separate collection and sorting activities are mostly carried out at city level, together with the investment required to maintain the necessary infrastructure. Stronger cooperation between cities and industry is needed to ensure that responsibility for investment is shared between all stakeholders through EPR schemes, and when necessary, making funding available for cities and industry.

- Deposit systems

Deposit systems have proven to be effective in preventing litter, as they contribute to very high collection rates and high quality recycling. An increasing number of EU countries are implementing deposit systems. The Commission should consider options for a more unified approach in the EU to deposit schemes to help member states to introduce such systems and to tackle cross-border effects between member states.

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<sup>1</sup> Annex III of the Plastic Strategy: <http://ec.europa.eu/environment/circular-economy/pdf/plastics-strategy-annex.pdf>

These systems should be accompanied by a substitution criteria introduced in EU regulation (such as within the Directive on Packaging and Packaging Waste) to set binding targets for substituting single use with multi-use plastic packaging.

- Bio-based plastics

Plastics based on renewable sources should be prioritised for climate reasons as fossil based plastics add to greenhouse gas emissions when incinerated. We support the development of bio-based plastics, where the environmental footprint from the value chain is clearly reduced and with the same recycling properties as fossil based plastics, so they can be recycled together. However, we stress that more scientific research should be carried out to better understand the possible side effects of bio-based plastics on the environment.

- Energy recovery

Not all plastics are recyclable in an ecologically and economically expedient way. Plastics with a high level of impurities or hazardous substances should not be recycled or landfilled. This type of plastic should be treated in waste to energy plants that have a high quality flue gas cleaning system and energy recovery or energy for industrial processes.

## Biodegradable plastics

We welcome the Commission initiatives for regulatory framework for biodegradable plastics. The use of biodegradable plastics should be restricted to applications where biodegradability has a specific purpose and can take place under natural environment conditions. There should also be a clear definition/specification of biodegradable plastics as well as guidelines, to encourage innovation and prevent blending of the different streams.

## Microplastics

We support the need for a separate strategy on plastic littering, including the unintentional release of microplastics, that addresses the responsibility of the different actors across the entire value chain to achieving the goal of reducing microplastics. We underline that microplastics are a complex problem and that future action of the Commission should address a wider range of marine plastic litter and microplastics, especially from tyre abrasion and road wear, going beyond the limited focus on plastic packaging in the current strategy.

City authorities, as operators of wastewater treatment plants, recognise the importance of developing better technology for capture microplastics. However, we stress that this is an end-of-pipe solution - costs for the developing this technology should be covered by the industry using microplastics in products.