

Conference Report
European Expert Conference

“Recommendations towards
the EU Plastics Strategy”

8th of June 2017





Welcome to the
European Expert Conference
**RECOMMENDATIONS
TOWARDS THE
EU PLASTICS STRATEGY**

6th of June 2017
Albert Borschette Congress Centre, Brussels



What are the most pressing issues to be addressed within the EU Plastics Strategy from an environmental perspective?

Which regional and national measures should be scaled up to the EU level?

How can economic benefits be combined with ambitious environmental goals?

These were the guiding questions leading the discussions at the conference “*Recommendations towards the EU Plastics Strategy*” with over 100 participants from politics, industry, NGOs, institutions, science and associations.

The Conference

On June 8th 2017, the European Expert Conference „Recommendations towards the EU Plastics Strategy“ took place in Brussels. This day also happened to be *World Oceans Day*. This year’s focus “Encouraging solutions to

plastic pollution and preventing marine litter for a healthier ocean and a better future“ highlighted the negative impact plastics have on the marine environment and set the motto for the one-day conference.



The conference was organized jointly by the Network of the European Network of the Heads of Environment Protection Agencies (EPA Network), the European Commission, and the German as well as the Austrian Environment Agency.

The main aim was to present the recommendations developed by the IG Plastics in relation to the upcoming EU Plastics Strategy of the European Commission.

Over 100 participants joined the discussions at the Albert Borschette- Conference Centre, and additional participants followed via live stream. Overall, the Commission’s initiative to develop the Plastics Strategy and the emphasis announced in the roadmap were positively received. The “*Recommendations towards the EU Plastics Strategy*”, published by the Interest Group Plastics in April 2017, were also met with strong support from the speakers.

EU Plastics Strategy

The conference was organized in response to the upcoming EU Plastics Strategy, which is announced for the end of 2017. Its main goal is “a strategy that addresses the challenges posed by plastics throughout the value chain and taking into account their entire life-cycle, such as reuse, recyclability, biodegradability, the presence of hazardous substances of concerns in certain plastics and marine litter”.¹

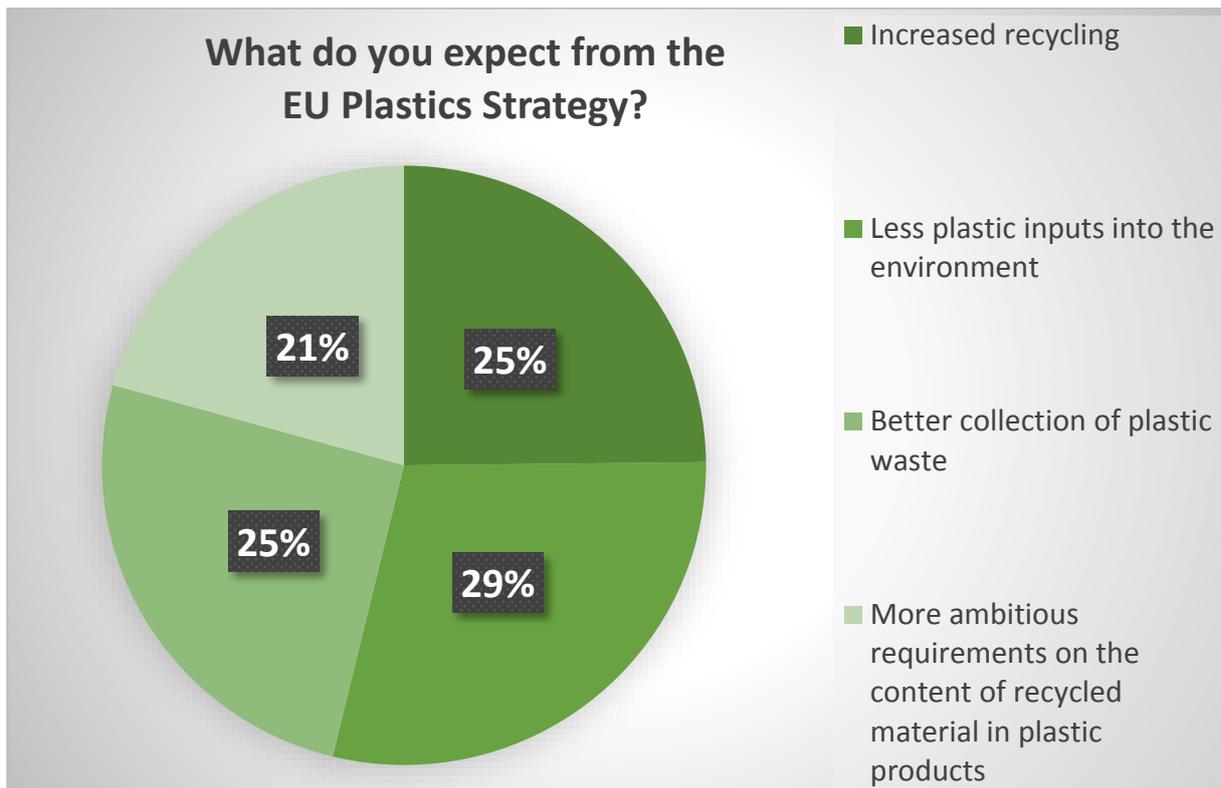
The Plastics Strategy is one of the five priority areas of the EU Circular Economy Action Plan and addresses three major issues, as announced in the roadmap from January 2017:

1. High dependence on virgin fossil feedstock
2. Low rate of recycling and reuse of plastics
3. Significant leakage of plastics into the environment.

¹ http://ec.europa.eu/smart-regulation/roadmaps/docs/plan_2016_39_plastic_strategy_en.pdf

In addition, the Strategy announces “an aspirational 30% reduction target for litter items found on beaches and for fishing gear found at sea”, as referenced in the Circular Economy Action Plan. This target aims to connect the observations of plastic litter in the marine with a possible solution, the EU Plastics Strategy.

The chart below shows the results of a non-representative survey sent out to the participants on the Plastics Strategy prior to the conference². It becomes clear that the expectations on the Strategy are quite comprehensive: recycling, plastic inputs into the environment, collection of plastic waste as well as more ambitious requirements on the content of recycled material in plastic products – all of these topics are deemed relevant by the respondents. The reduction of inputs of plastics into the environment, such as littering, is on top of the list, while respondents seem less confident that the Strategy will lead to more ambitious requirements on recycled materials.



EPA Network

The EPA Network is the European Network of the Heads of the Environment Protection Agencies. It was established in Copenhagen in 2003 in order to facilitate high-level dialogue on critical issues surrounding environmental policy implementation. In the biannual plenary meetings the EPA Network

² 89 respondents replied to the survey.

members discuss environmental issues of strategic importance at the national, European and international level and exchange experiences and best practices.

IG Plastics

The EPA Network arranges its work on specific topics through various interest groups (IGs). The topics range from “Better Regulation” to “Noise Abatement”³. In 2016, the Network decided to establish an interest group on plastics. In October 2016, the group, chaired by the German Environment Agency, held its first meeting in Berlin. 12 Environment Protection Agencies participated and showed great interest in the topic.

In addition, the European Commission was present for the inaugural meeting and presented an introduction to the upcoming EU Plastics Strategy. The newly established interest group was asked to develop a compilation of topics deemed relevant from the environmental perspective. The group, which in the meantime had grown to 13 members, met again in February 2017 and developed seven recommendations as inputs for the EU Plastics Strategy. After presenting those recommendations at the EPA Network meeting in Rome in April 2017, a total of 15 European EPAs endorsed the paper and its recommendations towards the EU Plastics Strategy.

The recommendations were presented to the European Commission, and served as the basis for the Expert Conference held on June 8th 2017.

Key note talks

The morning session started with a key note on the IG Plastics recommendations from Maria Krautzberger, the president of the German Environment Agency.

Ms Krautzberger underlined the significance of the IG Plastics paper, given that 15 European Environment Agencies support the recommendations. Emphasizing the link between proper plastic waste management and environmental protection, Krautzberger said



“An effective EU Plastics Strategy will also result in better marine environmental protection”

*Maria Krautzberger
German Environment Agency*

In his opening statement, Director General Kestutis Sadauskas underlined that plastics do not only constitute a problem for the environment, but should

be considered a part of the solution as well. He emphasized the need for a new plastics value chain, from which plastics do not leak. Sadauskas made it clear that the Plastics Strategy faces a specific challenge:

“The measures proposed in the EU Plastics Strategy have to be beneficial for both sectors, economy and the environment”
Kestutis Sadauskas



The upcoming strategy would bring opportunities for businesses, and at the same time create a framework to help minimize littering and combat marine litter. Innovative approaches in product design could support this new approach. In addition, Sadauskas announced two studies on Microplastics the Commission would conduct as well as a planned study on harmonized criteria on biodegradability, including analyzing the actual viability and sustainability of bioplastics in general as an alternative feedstock.

Emma Priestland, Marine litter policy officer at Seas at Risk, highlighted an aspect often neglected in public debates: the social costs of plastic litter has no price tag. This pertains for example to waste treatment in countries outside of Europe, where large amounts of waste from the EU are shipped. This waste is often not treated according to European standards, and vulnerable demographics suffer from often intolerable conditions. Priestland suggested that:



“We bear the responsibility for our waste and for its effects on our marine environment – let us not export our problems!”
Emma Priestland
Seas at Risk

Karl Förster, Executive Director of PlasticsEurope, highlighted the positive sides of plastics and its beneficial role in achieving climate change goals. Its light weight contributes to fuel efficiency in cars and planes, Förster said. While his claim that incineration is also part of the circular economy was met with divided responses, another claim he made received broad support:

“No littering, no illegal dumping, no landfill! All of this means wasting the resource.”
Karl Förster
Plastics Europe



Recommendations of the IG Plastics



Recommendations towards the EU Plastics Strategy
Discussion paper from the Interest Group Plastics of the European Network of the Heads of Environment Protection Agencies (EPA Network)

April 2017

German Environment Agency (EPA)
Austrian Agency for Environment
Danish Environmental Protection Agency
Estonian Environment Protection Agency
Finnish Environment Centre (EPA)
French Environment and Energy Management Agency (ADEME)
Hungarian Environment Agency
Italy - National Institute for Environmental Protection and Research (ISPRA)
Lithuanian Environmental Protection Agency
Netherlands Environmental Assessment Agency (MIA)
Norwegian Environment Agency
Portuguese Environment Agency (APA)
Romanian National Environmental Protection Agency
Slovak Environmental Agency
Swedish Environmental Protection Agency
United Kingdom Centre for Environment and Health (UKCEH)

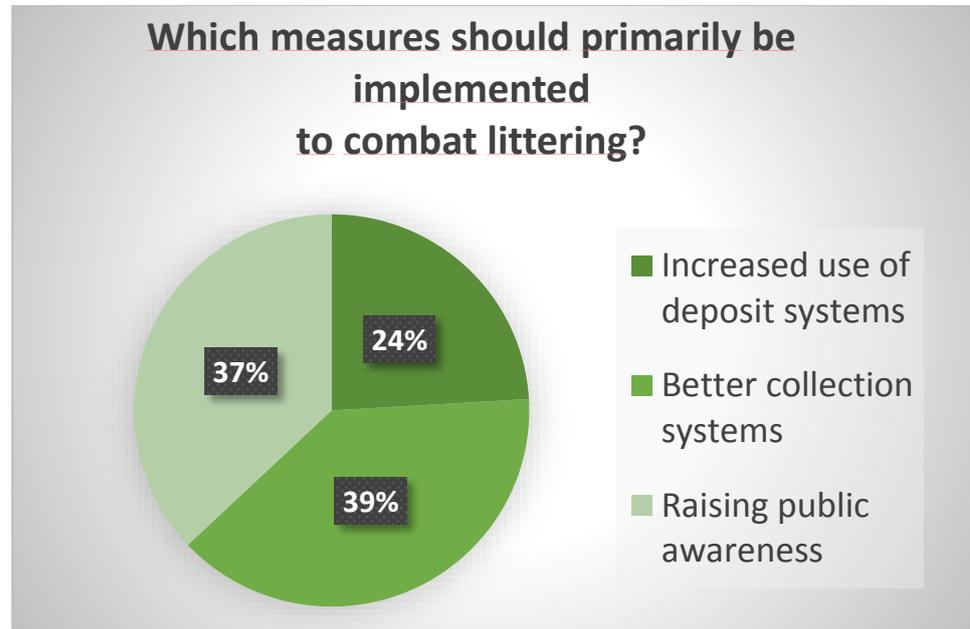
In the discussion paper “Recommendations towards the EU Plastics Strategy”, the IG Plastics introduces a set of seven recommendations that address the environmental perspective and should be considered in the EU Plastics Strategy. The following paragraphs first summarize the recommendations, and then give an overview on the discussions for each topic.

IG Plastics Recommendation 1: Prevention

The first recommendation of the IG Plastics focuses on plastic waste prevention as the highest priority in the waste hierarchy. The group advises to

- ▶ Prevent plastic waste formation
- ▶ Raise awareness on negative impacts of single-use plastics
- ▶ Share best practices in waste management
- ▶ Establish tailor-made training programs among practitioners.

Besides prevention of plastics especially for short-lived single-use products and the formation of plastic waste, prevention of inputs into the environment is another important aspect of this first recommendation. Combatting littering is one priority in this regard. Prior to the conference, the IG Plastics had asked the participants which measures should be implemented in order to avoid littering.



The numbers show that better waste collection system as well as raising public awareness are assumed to be best suited to address the problem of littering. Deposit systems are perceived as less effective. Whether this is due to the fact that not all countries have deposit systems in place and therefore not all participants have experiences with these systems or whether deposit systems themselves are indeed not seen as a solution cannot be answered conclusively here. One respondent pointed out that

“...in order to achieve a change in behavior, more direct stimuli are needed: by giving value to packaging waste by increased use of deposit systems, the material value becomes an argument rather than “saving the planet””. He adds: “it helps if bringing back waste or getting rid of waste does not require too much effort”.

During the conference, it became clear that the proposed Circular Economy approach with its focus on recycling should be supported as a business model. Priorities include the avoidance or reduction of single-use plastic items and packaging as well as measures to prevent the entry of plastic waste into the environment. With regard to prevention of plastic waste formation, single-use plastic items as well as packaging are considered of special concern.

Kai Falk, Managing Director at German Retail Federation, promoted voluntary approaches and referred to the good experiences made in reducing the use of plastic bags in Germany based on up-to-date information:

“The EU reduction goal for plastic bags was achieved within one year on a voluntary basis”

*Kai Falk
German Retail Federation*



IG Plastics Recommendation 2: Individual targets

The second recommendation relates to the fact that waste management systems vary considerably across Europe. The group therefore suggests to

- ▶ Establish ambitious individual recycling targets
- ▶ Consider regional realities in waste management.

The discussion included a debate on the absence of “one size fits all” solutions. Many member states and industries have invested in systems that have merits and are well established. For these, establishing new systems would hardly be beneficial, even if these have led to good experiences in other member states. However, there are similar challenges across the EU, and there are best practices available in many countries which should be shared.

Ton Emans from Plastics Recyclers said that the European Member States do not ask for ambitious quotas at this stage. Ton Emans from Plastics Recyclers Europe even made it clear that currently,



“Member States ask for recycling quotas below the current average in EU Member States”

*Ton Emans
Plastics Recyclers Europe*

IG Plastics Recommendation 3: Green Public Procurement

Public procurement is a relevant factor in the European economy, and promoting “green” procurement would not only send a positive signal, but would also make a difference towards more environmentally friendly spending and consumption patterns. The IG Plastics recommends to

- ▶ Encourage reuse, reparability, recyclability and a long life span in product design

- ▶ Give preference to preventive measures implemented for plastic packaging waste
- ▶ Give preference to products that contain a high proportion of recycled material
- ▶ Give preference to products labeled with the EU Eco-label
- ▶ Establish environmental criteria for products and services.

The request to make better use of better procurement and to strengthen environmental requirements in public procurement tenders was met with great approval. Speakers agreed that “greener” procurement would be a strong signal and could develop considerable impact and that green procurement, should not necessarily be limited to the public sector.

Green procurement would also strengthen the demand for recycled materials, Ton Emans argued. Bettina Rechenberg, German Environment Agency, added that



“National authorities should be required to give preference to products with recycled content”

*Bettina Rechenberg
German Environment Agency*

IG Plastics Recommendation 4: Standardization

The IG Plastics recommendations include to award a mandate to CEN TC 249 to speed up necessary standardization work in product and process regulation. This is of special relevance for products to be used in the environment, such as fences or outdoor furniture, because they fragment over time. Process regulation addresses measurement techniques for microplastics in waste water treatment plants and helps to ensure the comparability of results for example.

Tabea Stötter from the International Commission for the Protection of the Rhine also supported this objective. For example, each state or even each project uses different methods for measuring the amount of plastic particles in rivers, makes it difficult to develop common approaches e.g. to combat litter introduction into rivers that cross state borders.

“The data available is often hardly comparable due to substantially different methods”

*Tabea Stötter
International Commission for the Protection of the Rhine*



It became clear that standardization was considered an important tool, but should not be understood a solution in and of itself. The main concern was that standards alone do not answer the question of whether a product or packaging is environmentally friendly, and neither does it enable the consumer to make an informed decision. For this purpose, an additional label would be needed:

“A standard alone has little value without an accurate unambiguous label to indicate what the standard means in practice”

*Richard Thompson
University of Plymouth*



In addition, the participants determined that several standards would be required: for recycled materials (just as there are standards for virgin materials), for sorting, as well as for specific applications, such as adhesives used in labels, which differ from country to country and make their recycling difficult.

One respondent of the survey pointed out that *“a number of sound standards, certifications and labels - e.g. for bio-based plastics that are mechanically recyclable or organically recyclable - exist... we do not need to start at the very beginning but need to make what has been achieved by the EC / CEN etc. more transparent for the consumer”*.

IG Plastics Recommendation 5: Recycling

Recycling is one of the main topics in the EU Plastics Strategy. In this measure, the Commission manifests its aim to link economic and environmental interests. While the IG Plastics acknowledges that recycling infrastructure and practices differ considerably between Member States, four measures are advised:

- ▶ Reduce the amount of biodegradable municipal solid waste in landfills
- ▶ Increase separate collection
- ▶ Include minimum requirements for recyclability in Ecodesign Directive
- ▶ Establish minimum recycle targets for specific plastic products.

Recycling was widely discussed during the conference. By many, recycling was considered the key factor for the success of the EU Plastics Strategy. There was broad support for a landfill ban as an important accompanying

measure to promote recycling. Most speakers also expressed their favor for an incineration ban for plastic waste.

Additional aspects were mentioned: Participants called for better communication between producers and recyclers. While this idea is certainly not new, it appeared that there was still a considerable need for better coordination between the sectors, and that the entire value chain cooperates in finding the solutions. Eugenio Longo from Borealis explained that his company has reacted to this challenge by buying a recycling company. This move follows the example of the metal, glass and paper sectors, where the biggest recyclers are at the same time the main producers.



“Recycling is an opportunity to grow for the industry”

*Eugenio Longo
Borealis*

Several speakers also pointed out that considerable amounts of plastic waste are shipped outside of Europe, which not only presents challenges if respective waste management systems do not meet environmental standards, but is also a loss for the recycling industry.

In order to strengthen the market for recycled material, one respondent of the survey suggested that the *“EU could stimulate that by a bonus system for recycled content in products”*.

Babette Winter, Committee of the Regions, pointed out that the subnational level can play a critical role in implementing European regulations on plastics:

“Cities and regions can be partners in raising awareness on proper waste management”

*Babette Winter
Committee of the Regions*



One reply received to the IG Plastic survey for the conference pointed out that recycling especially of packaging needs to be easier for the consumer:

“...one clear separation instruction is needed: ALL PACKAGES should return to sender, by door-to-door-collection and deposit systems. Existing systems, such as the Green Dert, are too confusing for citizens”.

IG Plastics Recommendation 6: Deposit Systems

The IG Plastics supports the use of deposit schemes as they help reduce inputs through littering and can generate homogenous recycling streams, collected through a closed loop system ensuring high quality. The recommendations include:

- ▶ Increase the implementation of deposit systems for specific product groups
- ▶ Encourage best practice sharing on deposit systems among European States.

Experiences with deposits in Germany show that the financial incentive to return the bottles helps reduce littering. On the other hand, it should be noted that the introduction of the deposit scheme did not promote the use of multi-use bottles.

Tor Guttulrsrud from Infinitum explained the Norwegian deposit system which links deposits to an environmental tax. This tax increases when return rates go down, and vice versa. Guttulrsrud’s advice for increasing return rates (and therefore better recycling):

“Put a price on it!”
Tor Guttulrsrud
Infinitum



He argued that telling consumers to bring their bottles back would not be enough – if there was a motivating financial incentive however, return rates would increase. This measure would also help to internalize environmental costs: he pointed out that currently, nobody pays the environmental costs of littering. Deposit schemes could help change that.

Overall, the feedback was that markets differ, which makes it difficult to implement a single measure. Teresa Martinez from Cicloplast/Cicloagro pointed out that what is good for one European region does not have to be good for another. Therefore, she advised to apply tailor-made approaches to particular circumstances. Martinez argued that deposit schemes are appropriate in regions where there is no packaging management system. Before making a political decision, it is advisable to analyze environmental, economic and social impacts.



“Solutions to avoid littering should always be accompanied by awareness-raising measures”

*Teresa Martinez
Cicloagro*

Overall, the feedback was that markets differ, which makes it difficult to implement a single measure. Solutions for combating littering and increasing recycling should be tailor-made; however, regulations such as the Norwegian environmental tax could be scaled up. With regards to the expansion of deposit systems to other product or packaging groups, opinions varied: while some pointed out that there might be strong opposition from industry against new deposits, others highlighted the fact that more product and packaging groups would come into question from a technological point of view, allowing for a closed loop collection system capable of delivering the high quality recycled plastic material, that the industry seeks.

IG Plastics Recommendation 7: Bioplastics

Bioplastics are a topic which raises a lot of debates, especially since the use of fossil fuel for plastic production is expected to increase. However, it is often not clear what the term “bioplastics” encompasses, and whether bioplastics constitute a more environmentally friendly alternative to conventional plastics. The IG Plastics recommends to

- ▶ Ensure uniform definitions and standards for biodegradable plastics before promoting further use
- ▶ Avoid so-called oxo-degradables.

The discussions on bioplastics echoed the IG Plastic’s cautious approach. A major concern was the confusion among consumers who may question how to dispose of products or packaging made of biodegradable plastics. In addition, Richard Thompson, University of Plymouth, underlined that “Biodegradable plastics are still part of the linear economy”. For this reason, he said, biodegradable plastics would not constitute a solution in combatting marine litter.

Way forward

While the recommendations of the IG Plastics were broadly supported, it also became clear that a number of aspects had not been covered by the group. This pertains especially to the social aspects of plastic waste.

Another topic of concern is the export of plastic waste to outside of Europe. This entails various related issues, such as the losses for the recycling indus-

try, the lacking circularity of the material stream inside of Europe, the negative environmental and social impacts improper waste management can have when treated outside of Europe, etc.

Apart from the topics raised in the IG Plastics discussion paper, additional aspects arose during the conference. One of them was the question on how to monitor the success of the EU Plastics Strategy. While the Commission suggested to limit the number of indicators in order to ensure their operability, inputs from speakers and audience underlined that before discussing indicators, the target should be clear: what do we want to measure? Which measurements are therefore needed? Are there any examples of existing indicators that could be adapted? How do we measure prevention and circularity?

Emma Priestland and Richard Thompson both made it clear that relying on findings in the marine environment might not be sufficient, because the considerable time delays from source to sink make it difficult to link measures to results. Therefore, the focus should instead lie on measuring changes on the input side.

Wrap up

“We are not sure you made our life easier” - this feedback from the European Commission’s DG Environment on the conference mirrors the complexity of the issues discussed during the day. On many topics, such as the question whether national examples of deposit systems can be scaled up to the European level or whether voluntary actions will be more efficient than mandatory ones, single solutions and straight forward replies can hardly be expected. Nevertheless, it became clear that action is urgently needed to combat inputs of plastics into the environment, and that preventing single-use plastic packaging is an important first step to do so. Karl Kienzl from the Austrian Environment Agency reminded the audience that 3 kg of packaging waste is generated per person per week, most of which is plastic waste. He added:



“Europe should be the frontrunner in reducing plastic waste!”

Karl Kienzl

Austrian Environment Agency

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