



Committee of the Regions

ENVE-V-036

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DRAFT OPINION

Green Paper on a European strategy on plastic waste in the environment

Rapporteur: **Councillor Linda Gillham (UK/EA)**
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Deadline for tabling amendments:

midnight on Monday 23 September 2013 (Brussels time) to be submitted through the new online tool for tabling amendments (available on the Members' Portal: <http://cor.europa.eu/members>)

Number of signatures required: 6

Reference document

Green Paper on a European Strategy on Plastic Waste in the Environment
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Draft opinion of the Committee of the Regions – Green Paper on a European strategy on plastic waste in the environment

I. POLICY RECOMMENDATIONS

THE COMMITTEE OF THE REGIONS

1. welcomes the Green Paper on plastic waste in the environment. Optimum waste management is one of the greatest challenges facing local and regional authorities (LRAs) today, both in reducing the environmental impact of increased waste generation and preserving natural resources;
2. points out, however, that waste prevention must still have the highest priority. In addition to optimisation of waste management, comprehensive and ambitious waste prevention are the greatest challenges;
3. recognises that household participation is key to increasing prevention, collection and recycling targets. LRAs are able to provide citizens with information and facilities to adapt their consumption habits and to boost the range and quality of materials collected. This relies on a commitment to embrace the concept of waste plastic as a potentially valuable resource;
4. acknowledges that there are disparities between Member States in waste management. For many reasons, including public opposition, in many Member States investment in waste management facilities has been slow to come forward, with long lead-in times for delivery of infrastructure;
5. regrets the lack or slow pace of strategic planning along the waste management chain: actions for prevention and preparation for re-use, collection systems, treatment plants, markets leads. Secure markets will only evolve with sufficient volumes of plastic recycle material;
6. calls on the European Commission to ensure that existing EU environmental legislation is fully implemented and enforced throughout all 28 Member States. Considers that there is currently a lack of resources for enforcement and control;
7. welcomes the intention to review the Landfill Directive in 2014. Considers that this should entail a landfill ban on plastics and highly-combustible waste by 2020. The CoR recognises that the waste management industry and LRAs need time and certainty to invest in appropriate infrastructure for collection, sorting, recycling and efficient end-processing. While Member States that are lagging behind may need a phase-in period for a ban, all plastic waste must be managed as a resource as envisaged by the Roadmap to a Resource-Efficient Europe in order to meet the 2020 objectives;

8. recognises that while seven Member States already landfill less than 10% of waste, eleven Member States still landfill more than 60%. Waste management needs to recognise the specific value of plastic with better and more efficient collection systems to minimise contamination;
9. calls on the European Commission to adopt an integrated approach to all plastics including electrical waste (WEEE), end-of-life vehicles (ELV) and packaging in future reviews. Targets in the Waste Framework Directive (WFD) are too low and do not specifically address plastic waste. New targets for plastic should address the issue of tonnage which is not appropriate as a measurement tool especially for very lightweight plastic film. Targets should reflect environmental weightings for the materials to increase the value of plastic which tends to be overlooked in favour of heavier recyclables;
10. notes that Member States have all embraced "energy from waste" (EfW) as a legitimate alternative to landfilling residual waste remaining after reuse and recycling;
11. calls for the setting of targets for prevention, preparation for re-use and recycling in addition to landfill diversion, as the former are more accurately measured;
12. believes that these measures will drive plastic waste up the waste hierarchy and endorses the European Parliament's request for a ban on landfill of all recyclable and biowaste by 2020, but cautions that there is a risk of increasing the export of plastic waste outside Europe unless plastics recycling is further developed in the EU;
13. calls for greater promotion of recycling plastic at all stages to encourage a circular economy. Initial design should consider not just end-of-life recycling but rationalisation of polymers used in production to ease separation for recycling;
14. encourages the European Commission to promote green public procurement with greater incentives in prevention, preparation for re-use, recycling, and increasing the content of recycled plastic in new goods;
15. asks the European Commission to consider funding future infrastructure that recycles plastic effectively and to cease funding for landfill and incineration, while also supporting the market for plastic recyclate and therefore creating employment;
16. recognises that material recycling enables the EU to become more self-sufficient in raw materials, and that energy recovery should remain a subsidiary option, in line with the waste hierarchy, in order to realise the full potential of the diverted waste and not create a "vacuum cleaner effect" in favour of energy from waste, as the Green Paper recommends;
17. believes strongly that doorstep collection systems should be mandatory but should also be designed to encourage separation and maximise recovery of high quality recyclable materials.

This is a question of subsidiarity and while comingled dry recycling is proving very efficient in some Member States, it must be recognised that methods of collection vary from urban to rural areas and from country to country. While it is impractical to have a uniform "one size fits all" policy there are grounds for a voluntary rationalisation and standardisation of collection methods;

18. reiterates its view that there may be possibilities for regional authorities to work together on cross-border waste management and treatment hubs for similar types of properties i.e. high rise flats to ensure efficient management of waste streams and optimum use of the infrastructure and resources available to the sector;
19. believes that existing targets should be better enforced. Moreover, supports the introduction of specific and ambitious, but achievable, targets for prevention, preparation for re-use and recycling of plastic waste, to be harmonised in all relevant directives. Additionally, considers that support for a market for recycled plastic would promote high quality recycling more effectively than energy from waste;
20. regrets that current reporting of recovery targets under the WFD are based on collection and not on actual recycling or energy recovery. There is an urgent need to clarify definitions and find a single calculation methodology for recycling performance;
21. recognises that the European Commission has already introduced a support programme for the ten lower-performing Member States on waste policies. Regrets that 18 Member States are still far from achieving compliance with the Waste Framework Directive;
22. suggests that a range of measures are required, as no one policy instrument will divert waste from landfill to recycling. However recycling is not always a viable strategy where plastic recycling is technically difficult and not always economically justified, even for the best environmental reasons;
23. believes the EU is in a good position to show global leadership in the elimination of plastic to landfill and should share best practices in waste management locally, regionally, nationally and internationally. The EU should promote sustainable initiatives and ensure recyclers ship only to recycling plants with the same management obligations as EU plants. Brokers are not recyclers and the CoR calls for tighter monitoring of the application of shipment regulations at European ports;
24. recognises that plastics have a global destination, therefore good practice at the design stage in re-use repair and design for recyclability will be effective beyond the boundaries of the EU and will help prevent plastic items becoming future marine waste;
25. notes that many consumer goods, especially electrical and electronic items, are manufactured outside the EU and, due to high EU labour costs, are subsequently re-exported for

disassembly, recycling or disposal. Abiding by the proximity principle, the CoR recommends developing recycling and re-use infrastructure within an EU framework, in order for Member States to make efficient use of the waste management infrastructure in place across the EU and to avoid unnecessary duplication of investment. Thus plastic waste could be treated in neighbouring countries without the need to build many types of recycling plants in each Member State, whilst specific infrastructure for specialist treatment of certain types of waste could be planned across the EU to avoid duplication. CoR acknowledges that appropriate cross-frontier controls on the movement of waste should be in place and enforced;

26. believes that while voluntary action can complement legislation, some regulation will be necessary to ensure an efficient, effective, safe and sustainable waste framework. However the CoR believes that the European Commission should consider measures that inform and influence consumer and household behavioural change before resorting to taxes or bans;
27. calls on the European Commission to study the best way of applying extended producer responsibility in the EU, particularly with regard to plastic waste, the management of which is too often the responsibility of local and regional authorities. Better application of this responsibility should make it possible to market products which generate less plastic waste, and plastic waste which is easier to recycle. The payment of a deposit and the obligation to take back the article at the end of its life are paths which should be followed at EU level for certain plastic products in order to reduce the heavy burden on local and regional authorities; believes that it is also worth promoting "take-back" schemes to retailers, schools and workplaces where quantities of separated valuable resources can be accumulated to make recycling more viable. Existing examples include mobile phones and printer cartridges. The Committee believes that the "pay-as-you-throw" principle for bulky articles should be obligatory, using collection methods established by the local and regional authorities;
28. recognises there is scope to develop deposit and return schemes on a case-by-case basis. Recovery of beverage bottles and containers has proved successful in some Member States and offers quality material to be recycled. This could provide a valuable alternative in rural areas where separate collection is not viable. Collections of plastics such as PET (polyethylene terephthalate) can also be further encouraged by LRAs through Environmental Sustainability Plans for large public events;

Eco-design

29. considers that product design is pivotal to minimising waste. Believes that whereas the current eco-design directive focuses on water and energy consumption, a review could now broaden the scope to extend its application to other plastic products and include requirements for preparation for re-use, combating obsolescence, repairability and recycling with advice to the consumer on the durability of a product (for example, a "product passport" to accompany a product.) Design is important for consumers but also waste authorities who are responsible

for managing the "end-of-life" of products. Good design of an item and its associated packaging and disassembly will foresee and improve recyclability;

30. considers in this context that the number of types of plastic (composition) should be reduced to make it possible to melt down sorted, compatible plastics. This would require a clear statement of the type of plastic on packaging and products to facilitate sorting;
31. believes that guidance on sustainable product design for the complete life cycle, including end-of-life treatment, will help the user understand the real value of an item and prevent some valuable resources from being wasted unnecessarily;
32. advocates a mandatory minimum recycled content in future design reviews while understanding that some food and personal health uses require specified standards from the material;
33. calls for the progressive elimination of the use of dangerous substances in plastics, both in new and recycled products, in order to reduce the risks linked with their use and increase opportunities for recycling. The Committee supports the suggestion contained in the Roadmap to a Resource Efficient Europe that, by 2020, all Substances of Very High Concern should be included in the REACH Candidate List, which would make it possible to focus on the plastic additives in question. Calls, in this connection, for special attention to be paid to micro-plastics and nanoparticles, which pose new problems which are not necessarily covered by the REACH regulation;
34. calls, in the context of eco-design, for particular attention to be paid to 3D printers, the development of which could have a significant impact on the quantitative and qualitative production of plastic waste;

Single-use disposable plastics

35. believes there needs to be a combination of measures to address short-lived single-use disposable plastic items, including provisions to reduce their use and promote articles designed for repeated use. Irresponsibly-discarded empty plastic carrier bags and bottles epitomise our throwaway society and blight our environment;
36. believes that voluntary initiatives at national level, including take-back responsibility for retailers, could help to transfer the cost of handling some plastic waste from waste and environmental authorities throughout the entire value chain. Such measures need to include a consumer education programme;
37. considers that "take-back" could be encouraged and extended to other frequently visited venues (workplaces and schools often operate small equivalent schemes which help them collect a viable quantity for recycling). This will often only be attractive for the most valuable

recyclate, meaning that LRAs could be responsible only for the residual waste. In this context, the payment of a deposit and the requirement to take the article back at the end of its life are interesting ideas for implementation at EU level for single-use disposable plastic and particularly disposable drink packaging, in order to ensure the optimum application of this measure and reduce the heavy burden on local and regional authorities;

Biodegradable

38. expresses its concern that consumers may be misled by the term "biodegradable" when these plastics will often only biodegrade in industrial composting facilities at high temperatures;
39. stresses that it is important to distinguish between degradable, biodegradable and compostable. These terms are often incorrectly used interchangeably. A plastic maybe degradable but not biodegradable or it may be only compostable;
40. believes harmonisation and simplification are essential in all labelling for consumers. However is concerned that some information is confusing or misleading and may need removing. Information on appropriate recycling procedures and recycled content should be easy to understand;
41. is also concerned that the term "bio-based plastics" may imply green credentials when biomass used in production may not be sustainable or could compete with land for food use;
42. therefore calls for European Normalisation Standards for compostability (both industrial and home), biodegradability and degradability to be established with EN standard test methods in appropriate environments including soil, marine and freshwater, wastewater treatment plants and anaerobic digestion. This will lead to an EU-wide labelling system to distinguish these claims;
43. calls for international agreement on a ban on the use of plastic micro beads for cosmetic use in facial scrubs, toothpaste and other personal products to prevent this relatively new source of pollution entering the food chain;
44. is concerned that plastic labelled as "oxo degradable" is only oxo fragmentable, not bio degradable and when fragmentation takes place there is the potential to leave micro plastic particles in the environment. When introduced into the recycling process oxo fragmentable plastic has been found to contaminate and compromise the quality of the recycled material. Again there is considerable evidence to call for a ban on oxo degradable plastic until further research establishes these products have added value;

Marine waste

45. agrees with the Green Paper that "the majority of waste found in our seas and oceans is plastic" and this represents a serious global problem. Believes that reduction of the volume of plastic entering the marine environment must be a priority for all stakeholders in the lifecycle of plastic;
46. recognises the need for further studies to examine sources, transport and occurrence of both macro and micro plastic litter in the environment. It is also necessary to understand the impact of these microscopic particles on marine life;
47. calls for an increase in monitoring and data collection to assess the success or failure of specific measures and help develop possible solutions. Considers that a specific reduction target for marine litter can only be formulated if accurate data on the current volumes of marine litter are available;
48. advocates a two pronged strategy:
 - (a) a land-based/shore-based strategy to prevent plastic waste from entering the aquatic environment;
 - (b) a marine based strategy to ensure that ocean and sea based activities handle their waste responsibly.

the land/shore-based strategy relies on the measures noted above, whereas the marine-based strategy relies on the better enforcement of MARPOL (International Convention for the prevention of pollution from ships) and other Conventions;
49. recommends greater policy coordination and enforcement between the EU and the International Maritime Organisation (The United Nations agency responsible for the safety and security of shipping and the prevention of marine pollution by ships);
50. recognises that the EU Marine Strategy Framework Directive has set targets for marine litter and any new targets should be coherent with existing waste targets. Specific targets for plastic could be considered but any target should be SMART and not just call for a reduction. Existing waste and resources legislation under MARPOL need to be better enforced now;
51. recognises the role of LRAs in awareness-raising. Knowledge of the spread of plastic litter in the riverine and marine environment is a precondition to rectifying and reducing the magnitude of the problem. This can involve promotion of educational programmes in schools, encouraging responsible behaviour in the tourist industry, and initiatives by the plastics industry. The introduction of "European Clean-Up" weeks or similar initiatives with appropriate publicity would raise the profile of the problem;

52. encourages cooperation between LRAs and voluntary organisations to better focus valuable "clean up" initiatives. While coastal clean-up days, beach litter bins and beach collections only collect a small percentage of litter, they also help raise awareness in local communities. Campaigns by the fishing industry to fish for litter on non-fishing days and to be able to dispose of litter at the nearest port rather than the home port could be promoted;
53. believes that LRAs alone cannot meet the costs of marine litter and calls for greater cooperation within Member States at all levels of governance and responsible institutions, water authorities, port authorities and the waste management industry to find cost-effective ways of preventing plastic waste entering the marine environment;

Concluding remark

54. calls on all actors in the waste management industry to work together to reduce the incidence and impact of plastic in the environment and the use of raw materials and recognise the potential of plastics as a valuable resource. This is a challenge as plastic is cheap and versatile with a growing number of applications but its durability creates a lasting problem. While the growing accumulation of plastic litter in the global marine environment is a wake-up call it is acknowledged that the majority of this uncontrolled disposal originated on land. Plastic litter in any environment is unacceptable!

Brussels,

II. PROCEDURE

Title	Opinion on the Green Paper on a European Strategy on Plastic Waste in the Environment
Reference(s)	COM(2013) 123 final
Legal basis	Article 307 TFEU. Optional referral.
Procedural basis	
Date of Commission letter	8 May 2013
Date of President's decision	20 June 2013
Commission responsible	Commission for the Environment, Climate Change and Energy (ENVE)
Rapporteur	Ms Linda Gillham (UK/EA), Member of Runnymede Borough Council
Analysis	19 July 2013
Discussed in commission	2 September 2013
Date adopted by commission	2 September 2013
Result of the vote in commission	Adopted by a majority
Date adopted in plenary	Scheduled for 7-9 October 2013
Previous Committee opinions	Outlook Opinion on The review of the European Union's key waste targets, CDR1617-2013_00_00_TRA_AC Opinion on A Resource-Efficient Europe – Flagship Initiative under the Europe 2020 Strategy, CdR 140/2011 fin ¹
Date of subsidiarity monitoring consultation	n/a

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[OJ C 9, 11.1.2012, p. 37.](#)