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Single-Use Plastics Directive

Avoid Loopholes and keep ambitious Objectives

Key Points of an ambitious Single-Use-Plastics Directive

By *Deutsche Umwelthilfe e.V. (Environmental Action Germany, DUH)*

- Strong 90 percent separate collection target for plastic bottles from 2025
- Mandatory recycled content of 35 percent for plastic bottles
- EU-wide consumption reduction target of at least 25 percent
- Bans on disposable bioplastic products and disposable paper products with plastic coating
- Binding reuse quotas for beverage, sales and transport packaging
- Extended producer responsibility schemes instead of voluntary agreements
- Definition of single-use products based on differentiation from reusable products

EU Directive to tackle plastic waste in the environment

On 6 November 2018, the first trilogue meeting on the proposal for a Directive on the “Reduction of the Impact of Certain Plastic Products on the Environment” (COM(2018)340) took place between the EU Institutions. **The Directive is a great opportunity to protect the marine environment, increase resource efficiency and further develop the German and European circular economy.**

Deutsche Umwelthilfe e.V. (Environmental Action Germany, DUH), an environmental association active at national and EU level, has been working for many years to prevent waste and protect the oceans. We therefore expressly welcome the initiative by the European Commission to reduce the release of plastic waste into the environment. However, both the draft directive put forward by the Commission and the position of the European Council have major weaknesses, which, in our opinion, could jeopardise the sustained success of the proposed regulation. In our view, the EU must take a leading role globally in promoting waste prevention and marine conservation. We therefore urge you to take a firm stand and support the following proposals in the above-mentioned legislative proposal and beyond:

90 percent separate collection target for plastic bottles from 2025

Plastic bottles are among the top items polluting water bodies and beaches. **The 90 percent separate collection target for plastic bottles from 2025, which was proposed by the European Commission in Article 9 of the draft Directive, is therefore of particular importance.** The Council’s proposal to postpone the implementation of the 90 percent target until 2030 would lead to ongoing environmental pollution and would decrease the necessary pressure for rapid action. Furthermore, the suggestion brought forward by Luxembourg and adopted by the Council to enable mixed collection of plastic bottles with other packaging and to calculate the collection rate based on the amount of waste generated rather than on the number of bottles placed on the market provides unnecessary loopholes to EU Member

States with low ambitions. This undermines the consistent approach of collecting plastic bottles separately in order to achieve the highest possible collection rates.

Mandatory recycled content of 35 percent for plastic bottles

The European Parliament suggested a mandatory recycled content of 35 percent for single-use plastic beverage bottles. This is a particularly important measure for closing the loop and enabling a high-quality bottle-to-bottle recycling. It is therefore **important to include this objective in the Directive as a mandatory requirement**. The proposal made by the Council and backed by the Commission, according to which member states should only “aim at” a recycled content of 35 percent in beverage bottles considerably undermines the effectiveness of the target.

EU-wide consumption reduction target of at least 25 percent for single-use cups and takeaway food containers

Disposable cups and single-use takeaway food containers are a particularly serious environmental problem. Foods and beverages are increasingly consumed on the go, often accompanied by the careless disposal of packaging waste in the environment. In order to counteract this development, there is an **urgent need for an EU-wide consumption reduction target of at least 25 percent for disposable cups and takeaway food containers as has been proposed by the European Parliament**. National consumption reduction targets as suggested by the EU Commission and the Council in the draft Directive (Article 4), lack precision and effectiveness. Exact data on the consumption of disposable cups and takeaway food containers is already available for Germany and can easily be obtained for other EU Member States. The lack of willingness to collect data must not be used as an excuse to undermine environmental protection measures.

Bans on disposable bioplastic products and disposable paper products with plastic coating

Bans, as proposed in Article 5 of the draft Directive, must also apply to disposable bioplastic products and disposable paper products with plastic coating. **Bans on coated paper plates must not be postponed until 2023**, as proposed by the Council. Biodegradable plastics must also be included in the scope of the directive in the future, as requested by the Parliament. An examination of standards for marine biodegradation, that are in any case unrealistic, as supported by the Commission and the Council, and the associated reassessment of disposable bioplastics products, are unacceptable. Even if there were to be plastics could easily degrade in a marine environment, this would not solve the problem of wasting resources through the non-reflective use of disposable products. In addition, **a marine bio-degradability standard could contribute to a dramatic increase in the consumption of single-use products and their disposal in the environment**.

Call for binding reuse quotas for beverage, sales and transport packaging

Unfortunately, none of the European Institutions' current negotiating positions include binding reuse quotas for beverage, sales and transport packaging, an effective measure for a sustained reduction of the release of environmentally harmful single-use plastic products into the environment. We therefore call on you to support reuse systems throughout Europe in the interests of environmental protection and the general public.

EU-wide introduction of extended producer responsibility schemes instead of voluntary agreements

So far, many manufacturers have not been held accountable for the environmental impact of the products they place on the market and that end up being littered, such as plastic tobacco filters. To tackle this issue, EU-wide systems of extended producer responsibility must be mandatory without exceptions, as proposed by the EU Commission and Parliament in Article 8 of the draft Directive. **Effective EPR and consumption reduction measures should under no circumstance be replaced by voluntary agreements**, as was proposed by the Council.

Definition of single-use products based on differentiation from reusable products

The definition of single-use plastic products should, as proposed by the European Commission in the draft Directive, be based solely on a reasonable differentiation from reusable products. The Council's proposal to define single-use products on their tendency of being littered (e.g. derived from the size of the product) is particularly problematic. Single-use products like dis-posable large-sized beverage bottles should not be exempt from the scope of the Directive.

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Environmental Action Germany

Headquarters Radolfzell
Fritz-Reichle-Ring 4
78315 Radolfzell, Germany
Phone: +49 77 32 9995 - 0

Headquarters Berlin
Hackescher Markt 4
10178 Berlin, Germany
Phone: +49 30 24 00 867 - 0

Contact

Thomas Fischer
Director Circular Economy
Phone: +49 30 24 00 867 - 43
e-mail: fischer@duh.de

Henriette Schneider
Project Manager Circular Economy
Phone: +49 30 24 00 867 - 464
e-mail: h.schneider@duh.de

www.duh.de

[@ info@duh.de](mailto:info@duh.de)

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