

Feedback on the roadmap for the new Circular Economy Action Plan

Plastic Change welcomes the roadmap for the new Circular Economy Action Plan, and the European Green Deal as a whole, but we would like to suggest that you take the following into account.

Think of the plastic and climate crises as two sides of the same coin

The plastic and climate crises are deeply intertwined, and it is important to think of them together to fully understand the source of the problems – overproduction and overconsumption. Only this way it is possible to find the required solutions. Overproduction is a problem, because the extraction of oil necessary in the linear economy is an extremely resource- and CO₂-demanding process, while overconsumption is a problem, because the waste management systems needed to handle the amount of disposed plastic – incineration and landfilling- are unsatisfactory in terms of CO₂-emissions and biodiversity. Because of this the Commission should integrate the Circular Economy Action Plan in the European Green Deal as a whole.

Use ambitious, concrete and legally binding measures

We appreciate that the objective of the new Circular Economy Action Plan is to “speed up the transition” from a linear to a circular economy, and that the European Commission plans to achieve this through e.g. a sustainable products policy with minimum requirements for products placed on the market. However, it is important to realize that plastic in itself can be a problematic material, and that the Commission c.f. the European Waste Hierarchy should focus on preventive solutions. For this reason we strongly recommend that the Commission applies a plastic tax and reduces the type of plastic products one can place on the market - Less polymers, less chemicals and more standardized products. Furthermore, the sustainable products policy should confront disposability, and the minimum requirements thus address toxicity, durability, reusability and repairability. In addition to this the new Circular Economy Action Plan should provide the necessary conditions, tools and financial incentives for member states, companies and municipalities etc. to establish deposit-return and refill schemes. This is only done by using ambitious, concrete and legally binding measures. The action plan should set clear quantitative

waste prevention and reuse targets, and biobased and biodegradable plastic should be submitted to the same prevention measures as conventional plastic as they will just hold a way for free riders to avoid legislation.

Ban plastic waste trade outside of Europe

Concerning the recent findings of plastic from e.g. Denmark, Germany, France and Portugal in Malaysia and Indonesia we strongly recommend that the Commission bans all plastic waste trade outside of Europe. That said it is essential that member states are not restricted from trading with waste within the internal market of the European Union, as this would force smaller member states like Denmark to build new recycling facilities, instead of using the premises in e.g. Germany, and as a consequence produce even more plastic in order to have a large enough quantity to be able to recycle it.

Keep up the good work with packaging and Extended Producers Responsibility (EPR)

It is important that the Commission follows up on its work with packaging and EPR. The sector of consumer goods is continually an important sector to address when it comes to single-use plastic. The future work should focus on phasing out the worst performing packaging and support reusable packaging. In general EPR and fee modulation should incentivize reduction, reuse and recyclability as well as ensure that producers internalize the full costs arising from the lifecycle of plastic.

Address chemicals

Lastly chemicals and microplastic should also be addressed in the new Circular Economy Action Plan. It is vital that the Commission phases out hazardous substances like endocrine disruptors, and withdraw the recycling exemptions on Persistent Organic Polluters (POPs) put in place under the Stockholm Convention. In more general terms it is important to identify chemicals systematically and communicate this to the entire plastic-supply chain. This is important at the supplier, manufacturer and seller levels as well as at the consumer level, so that sellers and buyers

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all along the supply chain can make an informed choice. In extension to this, labelling at the consumer level should be improved.