

ERP WELCOMES THE EUROPEAN PLASTICS STRATEGY

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European Recycling Platform (ERP) welcomes the European Commission's Plastics Strategy published on 16 January 2018 **addressing an important field of action towards a circular economy** and would like to contribute with its pan-European experience in the take-back market. In particular, we are **supportive of the following proposed actions**:

- The aim to increase the recyclability of **all plastics placed on the EU market** will provide necessary support to achieve the target to recycle at least 50% of plastics waste by 2030. A related **revision of the Packaging and Packaging Waste Directive** can lead to the required stimulation for a change in product designs.
- The **promotion of extended producer responsibility (EPR) schemes is the most effective and also most cost-efficient way to achieve this objective**. Together with defining reasonable targets and minimum requirements for EPR schemes as planned with the EU Circular Economy Package, it would provide the necessary **security for innovation and private investments** into privately organized collection, sorting and recycling technology / facilities.
- **Expanding EPR to plastics items not yet captured in collection schemes** would not only reduce littering, but also lead to an increase in recycling efficiency due to more volumes being collected and treated.
- **Harmonized rules regarding the eco-modulation of EPR fees** will stimulate changes in product design while ensuring a smooth functioning of the internal market. This will also position the EU as one market and as trendsetter for better product design in a global market.
- Better **implementation of existing obligations** together with an **effective enforcement** for a level-playing field as well as **measures raising public awareness** would help reducing littering, improve the quality and quantity of collection and, consequently, enable more and higher quality recycling.
- **Quality standards for recycled plastics on EU and international level** would facilitate the market for and the use of recycled plastics in new products thus closing the loop.
- **Green Public procurement** will lead the market towards more sustainable products and solutions.
- Addressing plastics globally by **harnessing global actions** also **sharing best practices** might persuade other countries to impose waste reduction and educational measures learning from the experiences and success stories in Europe.

In this context, ERP would like to use the opportunity to draw the attention to some topics that need some further clarification:

- **Regulatory and economic incentives** are an important element to avoid littering and boosting collection and recycling. However, those measures have **to be designed carefully** considering the nature, value and life time of a product.
- **Financing actions to curb plastic litter might overstrain the resources of EPR schemes** also having very limited influence on actual consumer behaviour such as littering. In any case this would require a careful review of the roles and influence of all actors, then setting related responsibilities and financial rules. As a general rule, all actors including EPR schemes shall finance what they can control.

About ERP

European Recycling Platform was founded in 2002 in response to the introduction of the European Union's Waste Electrical and Electronic Equipment (WEEE) Directive. ERP's mission is to ensure high quality and cost effective implementation of the Directive, for the benefit of its customers and the environment.

In June 2014, ERP became part of the Landbell Group, an international supplier of service and consulting solutions for environmental and chemical compliance. ERP and Landbell Group have collected more than 7 million tonnes of packaging, more than 3 million tonnes of e-waste, and over 50,000 tonnes of portable batteries.

ERP is the first and only pan-European producer responsibility organisation authorised to operate in Austria, Denmark, Finland, France, Germany, Ireland, Israel, Italy, Norway, Poland, Portugal, Slovakia, Spain, Sweden, and the UK. By passing on the advantages of multinational recycling operations to customers, ERP has proved to be the most competitive solution for companies in the countries where it operates for WEEE, batteries and packaging compliance, as well as take-back services.



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For further positions and background papers: <https://erp-recycling.org/position-papers/>