
Contribution to the Stakeholder Consultation on the Plastics Strategy

How to unlock Investment and Innovation for an Increased Recycling of Plastics

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The European Recycling Platform (ERP) welcomes the initiative of the European Commission to develop a strategy on plastics with the aim to tackle environmental issues related to their production, use and end-of-life and to establish a more circular economy.

ERP, as part of the Landbell group, is the only pan-European producer responsibility organisation (PRO) for WEEE, batteries and packaging. The group supports producers to implement EU waste legislation and has collected more than 7 million tonnes of packaging, more than 2.9 million tonnes of e-waste and more than 50,000 tonnes of portable batteries, all containing significant amounts of plastics. ERP's extensive expertise is built upon more than 15 years of experience in operating under various national compliance frameworks. From this experience, we would like to contribute to the Commission's plastics strategy by giving further insights on how to unlock investment and innovation for an increased recycling of plastics and thereby improving both quantity and quality.

In order to support the European Commission in establishing a more circular economy, we would like to make the following proposals for improvement:

1. Ambitious recycling targets and quality standards:

- ERP repeatedly advocated for **ambitious recycling targets** for plastics in order to increase recycling rates and reduce incineration and landfilling rates.
- In addition, the **implementation of quality standards** for treatment and recycled materials helps to ensure a high and sustainable quality and thereby to increase the uptake of recycled plastic.
- Both ambitious recycling targets and quality standards also set up a **clear and reliable framework** for all market participants and **increase security of investment** in sorting and recycling technologies which finally lead to a secure and high-volume supply of suitable recycled materials being required for the mass-production of new products.

2. Substances of concern in recycled plastics:

- The presence of hazardous substances in the plastics waste stream resulting from older products is a challenge, in particular for slowly moving items like waste electronic products. In combination with the **applicable product legislation** this presence **is heavily limiting the use of recycled plastic materials** (e.g. flame retardants or heavy metals). These materials can only be used in significant dilution mixed with virgin material in order to meet restriction limits in e.g. RoHS and REACH.
- Like being discussed in the Commission's roadmap on the analysis of the interface between chemicals, products and waste legislation¹, **it shall be evaluated whether recovered materials or products from recycled materials shall**

¹ http://ec.europa.eu/smart-regulation/roadmaps/docs/plan_2016_116_cpw_en.pdf

follow the same rules as virgin materials. It should be considered to review this approach by allowing special rules for the use of recycled materials. This would create a market for recycled materials with a stable supply and, thereby, boost the uptake of these materials. In order to fade out the use of hazardous substances, there should be a phased approach of restrictions until also the waste stream is “clean” and then, finally, the same rules can apply to recycled and virgin materials.

3. Competition and responsibility:

- ERP believes that a **competitive waste market** ensures the best results for both the environment in terms of high recycling rates and for consumers in terms of efficient prices.
- The principle of **holding producers responsible** for the costs of take-back, recycling and final disposal of their products (extended producer responsibility, “EPR”) has proven to be an effective means for fostering recycling and, thereby, unlocking required investments by private industry.
- Both competitive waste markets and extended producer responsibility are **essential for enabling innovation** in the recycling of plastics and also other materials.

4. Harmonized regulatory framework and economic incentives:

- ERP is convinced of the positive effects of a **harmonized regulatory framework** across all Member States on avoiding market distortions and inefficiencies and providing best outcomes for the environment and consumers. This is of high importance as in a European market there are typically European product designs and recycling infrastructure and not national ones.
- Harmonized economic incentives for the users of recycled plastics are also **key to ensure security of investment** and to **unlock innovations**, which are essential for increasing process efficiency along all sectors of the supply chain, turning plastic waste into a valuable resource and establishing a more circular economy. Such incentives could be granted in the form of consumption tax reductions for products using recycled materials, modulated EPR fees as being discussed in the Circular Economy Package or other appropriate measures.

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About ERP

The 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 cost effective implementation of the directive, for the benefit of the participating companies and their customers. As of June 2014, the Landbell Group, an independent recycling and resource specialist, based in Germany, has become a shareholder of ERP SAS.

ERP is the first WEEE compliance scheme authorised to operate in Austria, Denmark, Finland, France, Germany, Ireland, Israel, Italy, Norway, Poland, Portugal, Slovakia, Spain, Sweden and the UK thus passing on the advantages of multinational recycling operations to the consumer. ERP has proved to be the most competitive solution for companies in the countries where operates now offering WEEE, Batteries, Packaging and PV panel compliance services and know-how.

For more information on ERP, please visit www.erp-recycling.org