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Seizing the opportunity: Using plastic only where it makes sense

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Plastic pollution is out of control, with our use of plastic increasing from 15 million tonnes in 1964 to 311 million tonnes in 2014. Estimates suggest this will double again over the next 20 years¹, even though the harm caused by plastic pollution vastly outweighs the benefits of plastic to society.



Zero Waste Europe calls on the EU to **promote the existing alternatives to fast-moving and short-lived plastic applications**, by:

- Introducing an EU-wide target of a 20% reduction in plastic use by 2025, increasing to 50% by 2030.
- Introducing a target of a 50% reduction for 10 single-use plastic items by 2025, increasing to 75% in 2030, and banning certain applications by 2025. The list should be reviewed and expanded every five years. At present, these initial 10 items have readily available alternatives.

Reduction targets for single-use plastics and short-lived plastic applications are achievable, can generate more local economic activity, and save money on the management of littering and low-value waste. Although welcome, initiatives to close the loop of materials by increasing collection rates and designing for recycling are not sufficient. Europe cannot recycle its way out of plastic pollution but, rather, must have a strategy to reduce plastic use by choosing reasonable alternatives.

Zero Waste Europe believes that the transition away from unnecessary plastic use must:

¹ World Economic Forum, Ellen MacArthur Foundation and McKinsey & Company, *The New Plastics Economy — Rethinking the future of plastics*, 2016, available at: <http://www.ellenmacarthurfoundation.org/publications>

1- Support local and sustainable jobs and economic activity in Europe

Alternatives to single-use plastic applications have a positive impact on local job creation and innovation, even without including the externalities associated with plastic pollution and the street-cleaning costs chiefly borne by municipalities². Despite the lack of support and economic incentives, packaging-free shops have grown exponentially in recent years (there are over 500 such shops in Europe) and have been a net job creator even during the recession³. Progressive systems designed to prevent or manage beverage and take-away food packaging, such as deposit return schemes and reusable coffee cups, create more jobs than their single-use equivalents⁴. Europe should therefore embrace the economic opportunities that will accompany the responsible use of plastics.

2- Focus on quality and resilience rather than short-term use

The cost of plastic waste externalities, together with the costs associated with greenhouse gas emissions from plastic production, is estimated at USD 40 billion annually⁵. Europe is a net importer of natural resources, including oil and gas for plastics. Much of this plastic is designed to have a short useful life, sometimes lasting mere minutes. Single-use and short-lived plastic has the highest disposal rates and the lowest recyclability, and poses a major challenge to our health, ecosystems and economy. It is in Europe's interest to prioritise investment in applications that focus on quality, resilience and long-life products.

3- Listen to European citizens

Recent Eurobarometers show a 'very high level of agreement with the proposed initiative for tackling plastic waste' (over 90%). Citizens are keen to see leadership in this area, with 92% agreeing that 'measures should be taken to reduce the use of single-use plastic items'⁶. Countries which have taken strong action on single-use plastic bags show demonstrably positive attitudes among their citizens. In France, for instance, 82% of

² Although 70% of EU municipal waste is within the scope of an EPR scheme (as it is waste coming from products or product packaging), only 45% is actually covered by such a scheme (i.e. 31% of total municipal waste). Fundació per a la Prevenció de Residus i el Consum Responsable, *Redesigning Producer Responsibility*, 2015, available at: <https://www.zerowasteurope.eu/downloads/redesigning-producer-responsibility-a-new-epr-is-needed-for-a-circular-economy/>

³ <http://bepakt.com/packaging-free-supermarkets/list/>

⁴ Morris, J; Morawsky, C, *Returning to Work: Understanding the Domestic Jobs Impacts from Different Methods of Recycling Beverage Containers*, 2011, available at: <http://www.container-recycling.org/assets/pdfs/reports/2011-ReturningToWork.pdf>

⁵ UNEP, *Valuing Plastic: The Business Case for Measuring, Managing and Disclosing Plastic Use in the Consumer Goods Industry*, 2014.

⁶ *Attitudes of Europeans towards waste management and resource efficiency, Flash Eurobarometer 388*, p.47, available at: http://ec.europa.eu/commfrontoffice/publicopinion/flash/fl_388_en.pdf

people approved of the single-use plastic ban introduced in 2016⁷. These positive attitudes provide an impetus for the EU to take strong action on plastic and introduce bans and targets to reduce plastic use.

Seize the opportunity with a twofold policy action

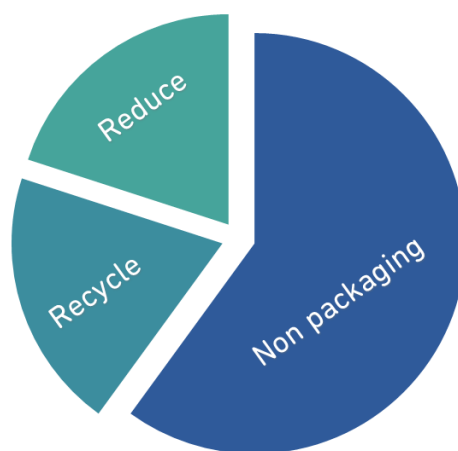
Complementary action is needed to ensure that the EU addresses plastic pollution from different waste streams and applications. The complex nature of plastics demands a twofold policy, as targeting the most common applications (e.g. packaging) is in itself insufficient to significantly reduce plastic pollution. It is also essential to tackle those plastics which pose concern due to their toxicity (such as cigarette butts), health risk (microplastics), low separate collection rate (wet wipes and nappies) and low recycling level (carpets).

1 - An overall reduction target for plastic packaging

Packaging accounts for over 40% of Europe's plastic use⁸. According to the Ellen MacArthur Foundation, 30% of current packaging applications could be redesigned, while a further 20% could be reused in an economically attractive manner⁹. Given the right measures and incentives, therefore, 50% of plastic packaging could be reduced, translating into a reduction of 10 million tonnes of plastic per year¹⁰, or a 20%

40% of plastics is packaging.

Half of the packaging
can be reduced
via redesign & reuse!



⁷ <http://www.toluna-thoughts.com/fr/2016/07/12/9-francais-sur-10-nont-deja-plus-de-sac-plastique-jetable-en-caisse-avant-linterdiction-de-juillet-2016/>

⁸ Plastics Europe, available at: http://www.plasticseurope.org/documents/document/20161014113313-plastics_the_facts_2016_final_version.pdf; European Commission http://ec.europa.eu/smart-regulation/roadmaps/docs/plan_2016_39_plastic_strategy_en.pdf

⁹ <https://newplasticseconomy.org/report-2017>

¹⁰ According to Plastics Europe, the overall plastic demand in Europe in 2015 was 49 million tonnes, 40% of which was for packaging (just over 19.5 million tonnes).

reduction in plastic use for packaging alone. As this redesign and reuse could also be applied to single-use plastics other than packaging, a 20% overall reduction in plastic use should be achievable.

Despite its acknowledged economic viability¹¹, reusable packaging has a declining market share across the EU, particularly in the case of plastic packaging. An EU-wide target for a minimum share of reusable packaging should be set¹², along with economic incentives to create a level playing field between single-use and refillable packaging.

The European Commission should develop good practice guidelines to prevent the 30% redesign objective being reduced to the mere lightweighting of plastic packaging as a means of reducing Europe's plastic footprint. The good example set by Europe's packaging-free shops should be used as a stepping stone to reduce overall packaging (including plastic packaging waste) and to support Member States to achieve the targeted 50% reduction in plastic packaging by 2030.

2 - Promoting substitutes for items of high concern

The promotion of alternatives to specific plastic items will significantly reduce plastic litter in both marine and land environments. Zero Waste Europe recommends starting with a list of 10 such items (see below). These items are either improperly collected or separated (e.g. wet wipes) or pose other problems (microplastic ingredients or cotton buds). Items of high concern should be assessed every five years, with a view to expanding the list to include new items.

Previous experience with the reduction of single-use plastic bags demonstrated citizens' positive attitudes to plastic reduction. The European Commission should build on this positivity and set reduction targets for each of these 10 items, while leaving the means by which the targets will be achieved to Member States' discretion. ZWE proposes a 50% reduction target for each of these items by 2025, moving to 80% by 2030. However, by 2025, specific bans should be introduced for microplastic ingredients¹³ and extended polystyrene.

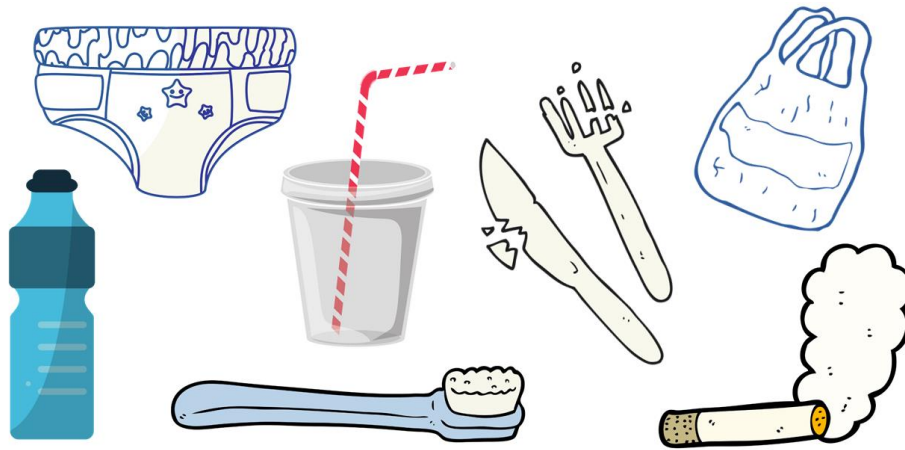
Some of the tools that could be used by Member States to achieve these targets include the expansion of Extended Producer Responsibility (EPR) to cover new streams. This should include a system of modulated fees, reflecting the sustainability of the product and encouraging redesign. Such an approach would also create a revenue stream with which sustainable alternatives could be rewarded. Other tools, such as deposit

¹¹ World Economic Forum, Ellen MacArthur Foundation and McKinsey & Company, The New Plastics Economy — Rethinking the future of plastics, 2016, available at: <http://www.ellenmacarthurfoundation.org/publications>

¹² This was being discussed in the trilogue meetings of the Circular Economy Package at the time of going to press.

¹³ The ban should apply to all microplastic ingredients, i.e. all solid water-insoluble microplastic ingredients of 5mm or less in any dimension used for any purpose. The definition should not include a lower size limit and should cover all plastics, rather than listing specifically prohibited plastics or specific ingredients used for a particular function.

return schemes, tend to increase the amount of materials collected, and have the capacity to touch material streams considered hard to reach, in particular takeaway food and drinks packaging¹⁴. Deposit return schemes for longer-life items such as mobile phones can help to create local jobs and strengthen European industry.



Beyond single-use items: solutions exist

10 items to start with

1. **Bottle caps** are one of the top 10 most littered items in the marine environment. Even where there are high collection rates for plastic bottles, caps are not specified, making such targets essential.

Aids for Member States include the promotion of reusable bottles together with the spread of public water fountains, the introduction of deposit return schemes for bottle caps (as well as the bottles), and the requirement for all plastic bottle caps on single-use containers to be attached to the bottle, as seen in the 'leash the lid' Bill in the USA.

2. **Bottles** can also benefit from a reduction target, which can be easily met by introducing the widespread use of public water fountains and reusable bottles, offering pitchers of tap water in restaurants, providing water dispensers in offices, etc. The introduction of deposit return schemes for single-use bottles would also ensure that these are collected for further recycling.

3. **Single-use nappies** and **wet wipes** are becoming one of the most important items in residual waste streams in places where separate collection is high¹⁵. A reduction target for single-use nappies would create an

¹⁴ ERM, *Review of Packaging Deposits System for the UK*, 2008.

¹⁵ In places such as Capannori, the first Zero Waste municipality in Italy, nappies represent 15% of the residual waste, <https://www.zerowasteurope.eu/downloads/case-study-1-the-story-of-capannori/>

incentive to promote reusable nappy schemes across Europe (e.g. laundry services), thereby ensuring their separate collection and triggering the right investment in infrastructure. Wet wipes used for make-up removal or baby cleaning are easily replaceable with flannels, towels or sponges, all of which are reusable and ultimately recyclable.

4. **Microplastic ingredients** must be banned in Europe by 2025, in view of the damage they cause to health, the environment and the economy. Any such ban should include products where microplastics have been deliberately added. Some Member States are already introducing bans on microplastics in certain products, with alternatives existing in some cases. An EU-wide ban would safeguard a level playing field in Europe, as well as demonstrating global leadership.

5. **Cigarette butts** are one of the most littered items in both the marine and land environment. Given their polluting potential, a reduction target could have a remarkable effect. Options for reduction include the implementation of deposit return schemes to ensure a high collection rate, the use of reusable filters, or even the possibility of eliminating cigarette butts *tout court*, as evidence suggests that they are of little or no health benefit to the smoker¹⁶.

6. **Take-away containers for food and drink**, including plastic cutlery, can easily be replaced by reusable and long-life containers and cutlery. A reduction target would allow widespread action, which could trigger the creation of new markets for associated deposit return schemes.

7. **Hygiene products, including toothbrushes, cotton buds, single-use razors and feminine sanitary items.** Many single-use items in this category could easily be replaced with existing alternatives, such as ear spoons instead of cotton buds, menstrual cups instead of single-use feminine towels or tampons, toothbrushes with replaceable heads, and reusable razors.

8. **Very lightweight plastic bags** (below 16 microns) have recently been banned in Italy, where alternative food packaging, particularly for loose fruit and vegetables, are already available. The European Network of Packaging-free Shops also offers many real-life examples of how each type of food item can be packaged to avoid single-use plastic, including lightweight bags.

9. **Expanded polystyrene** has extremely low recycling rates, and its health impact is well documented. It should therefore be banned entirely by 2025, with refillable, reusable food containers used as alternatives in food and drink applications (see point 6), and cardboard and mycelium used as replacements in packaging.

¹⁶ <https://www.newscientist.com/article/mg22229750-200-time-to-kick-cigarette-butts-theyre-toxic-trash/>

10. **Carpets**, which are mainly made of plastic, have a recycling rate below 3% in the EU, much of which is downcycling. With 700 million square metres of carpet placed on the European market annually¹⁷, there is considerable scope for improvement. Better design for small repairs, reuse and recycling (e.g. not using glue in the carpet), as well as deposit return schemes, will immediately reduce carpet use and promote appropriate end of life treatment.

This list is not exhaustive. Zero Waste Europe would also welcome action on other items, such as **single-use plastic straws, food wrappers** (crisps, sweets), **drink stirrers** and **plastic trays**.

Final recommendations

1. **Avoid paralysis by analysis:** A standardised method should be introduced to gather data on the plastic put on the market, collected as waste and managed. The overuse of plastic and its negative consequences is both evident and urgent, and the need for improved data is not an acceptable excuse for inaction. The proposals above offer the opportunity to move forward while collecting further data and developing a set of targets and a baseline for the coming years.

2. **Simply substituting materials is not the answer:** A strategy to cut plastic overconsumption should eventually reduce our environmental, social and economic impact, rather than merely transferring negative externalities to other materials and communities. As a net importer of materials and products, the social and environmental impacts of Europe's consumption are felt outside its borders. Shifting our dependency from one raw material (in this case, oil or biomass) to another (such as wood, metals, and so on) would only transfer the impact of our consumption and waste, and be, ultimately, equally unsustainable.

For more information

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ZWE is a member of the [Rethink Plastic alliance](https://rethinkplasticalliance.org/), alongside leading European NGOs campaigning for a future free from plastic pollution. The Rethink Plastic Alliance represents hundreds of thousands of active groups, supporters and citizens in every EU Member State, and is part of the global [Break Free From Plastic movement](https://breakfreefromplastic.com/), consisting of over 1000 NGOs and millions of citizens worldwide. [@RethinkPlastic](https://twitter.com/RethinkPlastic) [@BreakFreeFromPlastic](https://twitter.com/BreakFreeFromPlastic)

¹⁷ Changing Markets and Zero Waste France, *Swept under the carpet: recommendations for the carpet industry in France*, 2017, available at: <http://changingmarkets.org/wpcontent/uploads/2017/04/French-Carpet-Report-English.pdf>