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## **POSITION PAPER ON THE EUROPEAN COMMISSION'S PROPOSAL FOR A DIRECTIVE ON THE REDUCTION OF CERTAIN TYPES OF PLASTICS (SINGLE USE PLASTICS AND FISHING GEAR).**

### **Environmental protection is a shared responsibility**

NRK Verpakkingen acknowledges that marine litter is a **big global problem** that needs to be addressed **on a global scale**. The priority should be to stop waste of any kind from being littered and leaking into the environment. Making progress on this issue is crucial. All stakeholders, including plastic producers, plastic recyclers, retailers, government **and consumers**, need to increase their efforts to stop the flow of litter into the environment.

The recently revised Waste Frame Directive and the Packaging and Packaging Waste Directive pave the way for proper waste management systems, including measures improving collection and sorting systems. Extended producer responsibility for packaging waste, increased recycling targets and establishing a new policy on litter and prevention of littering are part of the European waste strategy.

Europe should implement these measures completely. Efficient collection, sorting and recycling facilities are essential to combat littering. Extended producer responsibility is only part of the solution. The government must set up an adequate infrastructure for collection, sorting and recycling. **Consumers awareness campaigns should change the habits of people**. But governments must also be the protector of the environment and fine those who litter. This surely should not be limited to plastics, but should be applicable for all disposables materials. We ask for an equal treatment for all disposable materials.

### **Single use plastics**

Plastics are used in a variety of single use applications. This does not automatically mean that they have a negative impact on the environment. In many cases, single use items have proved to be an answer to market or regulatory needs for best functionality, lightness, hygiene, consumer protection, food safety and prevention of food waste. They have clear environmental benefits.

### **Legislation should be proportionate**

The proposed legislation on single use plastics is disproportional. According to independent studies, global marine litter is mainly generated outside Europe. Banning certain types of plastic products should be a last resort. Banning can only be done if all other measures fail. In this case, no other measures with lesser impact, have been tried. We demand that the European Commission first implement the existing Waste legislation, including their new policy on litter and litter prevention. The revised waste Frame Directive identifies poor waste management practices and infrastructure, inappropriate consumer littering behaviour and the lack of public awareness as the root cause of litter. **Tackle the root causes first.**

**Clear definitions of single use products are essential**

The scope of the proposal is not clear and would catch numerous products that are highly resource efficient and not part of the items most found in the marine environment. The plates that are incorporate in the Annex, are not listed in the top 10 most littered items, so why are the mentioned? Most of the products listed in the Annex, can be and are collected, sorted and recycled.

The definition of single use should be **unambiguously** (what is single use rather than by what it is not) and should exclude items that are not linked to marine litter.

The proposed definitions and product categories will create significant problems in the practical implementation. Enforcement at national level will compromise the principle of the EU Single market by allowing European member States to restrict certain classes of products. There is no uniform approach, thus fragmenting the European Market.

**Choices must be based on scientific evidence and must be transparent**

The Commission's impact assessment appears to be based on the assumption that a non-plastic waste in the marine environment is better than plastic. As mentioned before, litter of any sort does not belong in the environment. Littering behaviour and improper waste management is independent of the type of material. If alternatives are considered, the decision need to be based on full life cycle analysis. The environmental choice should be made on scientific grounds without any preconceived preference for an material.

**Our commitment**

The Netherlands are far ahead in plastic recycling in comparison to other Western countries: more than 50% of all plastic packaging waste is collected and recycled. This does not mean that we are satisfied yet: we can collect and recycle a lot more.

NRK Verpakkingen and PlasticsEurope Netherlands have recently launched their Roadmap towards increasing the sustainability of plastics packaging.

We put our vision on plastic packaging into practice from five different angles:

- Reduce : lighter and more efficient packaging
- Reuse : reusable packaging
- Recycle : collection and reuse
- Redesign : better packaging design
- Renew : biobased instead of fossil raw materials.

Furthermore we are committed to Operation Clean Sweep.

This is a program stimulating our members in preventing pellet loss into the marine environment.