Seizing the opportunity:
Using plastic only where it makes sense

Plastic pollution is out of control and is expected to grow. Our use of plastic has increased from 15 million tonnes in 1964 to 311 million tonnes in 2014, and according to estimates, it will double again over the next 20 years\(^1\). The harm caused by plastics vastly outweighs the benefits they bring to society, and the profits cashed in by companies will never justify the damage caused by the pollution they create. However, alternatives to fast-moving and short-lived plastic applications do exist. Zero Waste Europe is calling for the EU to seize this opportunity, by:

- Introducing an EU 20% reduction target of plastic use by 2025, increasing to 50% by 2030.
- Introducing a 50% reduction target by 2025 for 10 single-use plastic items, increasing to 75% in 2030, as well as banning some applications. An initial list of 10 items where alternatives exist should be targeted, with a review to expand the action to potential new items every 5 years.

This paper provides a summary of how reduction targets for single-use and short-lived plastic applications are not only feasible but also have the potential to generate more local economic activity paired with savings in the management of littering and low-value waste. Indeed, initiatives to close the loop of materials by increasing collection rates and designing for recycling are welcome. However, Europe cannot recycle its way out of plastic pollution. Therefore, a strategy to reduce plastic use where alternatives exist is paramount.

To do this, ZWE believes that the necessary transition must:

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 without including the externalities associated with plastic pollution and street-cleaning costs, which today are shouldered almost entirely by municipalities\(^2\). Despite the lack of support and economic incentives, packaging-free shops have grown exponentially, and the over 500 shops in Europe have been a net job creator even during the recession\(^3\). Progressive systems designed to avoid or manage beverage packaging and take-away food, such as deposit and refund systems and reusable coffee cups, create more jobs than their single-use equivalents\(^4\). The list goes on, and Europe should embrace the economic opportunities that will come with using plastics responsibly.

2- Focus on quality and resilience, and not short-term use

It is estimated that the cost of plastic waste externalities plus the cost associated with greenhouse gas emissions from plastic production is USD 40 billion annually\(^5\). Europe is a net importer of natural resources, including oil and gas for plastics. Most of the plastic we use is designed to have a short useful life, sometimes even lasting only a matter of minutes. It is in Europe’s interest to prioritise investment in plastic and its applications that focus on quality, resilience and long-life products, rather than on volumes and short-term lives. Indeed, single-use and short-lived plastic has the highest disposal rates and the lowest recyclability, and poses a major challenge for our health, ecosystems and economy.

3- Listen to European citizens

Recent relevant eurobarometers show that “there is a very high level of agreement with the proposed initiative for tackling plastic waste”\(^6\), with over 90% of citizens being in favour of a variety of initiatives to tackle plastic waste. Interestingly, citizens are keen to see leadership in this area, since 92% agreed that “measures should be taken to reduce the use of single-use plastic items”\(^6\). Furthermore, in the countries


\(^2\) Although 70% of EU municipal waste is eligible to be under the scope of an EPR scheme, as it is waste coming from products or product packaging, only 45% of that is actually covered by one, meaning 31% of total municipal waste. Fundació per a la Prevenció de Residus i el Consum Responsable Redesigning Producer Responsibility, 2015 https://www.zero wasteeurope.eu/downloads/redesigning-producer-responsibility-a-new-epr-is-needed-for-a-circular-economy/

\(^3\) http://beakt.com/packaging-free-supermarkets/list/


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where strong action has been taken in the case of single-use plastic bags, the attitude of citizens has also been extremely positive – for example, in France, 82% of people were in favour of the single-use plastic ban introduced in 2016. The European Union should exploit such positive attitudes towards strong action on plastic coming from the EU, 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 coming from different waste streams and applications. The need to have a twofold policy is due to the complex nature of plastics, since targeting plastics where their use is the most extended (such as in packaging) is not enough to significantly reduce plastic pollution. It is also essential to tackle plastics of high concern due to a variety of reasons, ranging from their toxicity (such as cigarette butts) to health dangers (microplastics), low separate collection rate (wet wipes) and low recycling level (carpets).

1 - An overall reduction target for plastic packaging

Over 40% of Europe’s overall plastic use is in packaging. According to the Ellen MacArthur Foundation, 30% of the current packaging applications should be redesigned, and 20% could be reused in an economically attractive manner. Altogether, 50% of plastic packaging can potentially be reduced if the right measures and incentives are in place. This could be in the region of a reduction of 10 million tonnes of plastic per year, or a 20% reduction in plastic use for packaging alone. Considering that the alternatives to single-use plastic applications go beyond plastic packaging, a 20% overall reduction in plastic use should be achievable.

While the Ellen MacArthur Foundation acknowledges the economic viability of reusable packaging, its market share is declining across the whole of the EU, particularly in the case of plastic packaging. In order to stimulate the sector, an EU-wide target for a minimum share of reusable packaging should be set, along with economic incentives to create a level playing field between single-use and refillable packaging.

Furthermore, in order to avoid 30% of the redesign of plastics becoming a carte blanche for the lightweighting of plastic packaging as the only solution to reducing Europe’s plastic footprint, guidance on good practices should be developed by the Commission. For this, we would like to see the good examples found in the increasing number of packaging-free shops across Europe being used as a stepping stone to how to reduce overall packaging, including plastic packaging waste, allowing MS to have the support they need to move to a 50% reduction target for plastic packaging by 2030.

2 - Promoting substitutes for items of high concern

In addition, specific plastic items where alternatives exist need to be targeted in order to ensure that plastic litter is significantly reduced in both marine and land environments. ZWE recommends starting with the following list of 10 items, some chosen on account of them not being properly collected across Europe by any separation at source (wet wipes), others due to the problems they pose (microplastic ingredients or cotton buds). A specific assessment on the evolution of items of high concern should take place every 5 years with a view to expanding the action to potential new items.

The Commission should build on the positive citizen attitudes and previous experience with the reduction of single-use plastic bags and set reduction targets for each of these items, leaving MS to choose from the wide range of instruments that they can introduce to meet the target. For that reason, ZWE proposes to

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9 https://newplasticseconomy.org/report-2012
10 According to Plastics Europe, the overall plastic demand in Europe in 2015 was 49 million tonnes, 40% of which is for packaging, which is a total of just over 19.5 million tonnes.
11 This was being discussed in the dialogue plastic meetings of the Circular Economy Package at time of going to press.
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set a 50% reduction target for each of these items by 2025, moving to 80% by 2030. However, specific bans by 2025 should be introduced for microplastic ingredients\(^\text{12}\) as well as extended polystyrene. Some of the tools that could be used by MS include the expansion of EPR to cover new streams and ensure that they include a system of modulated fees, so that the fee reflects the sustainability of the product and encourages its redesign, but this will also create a money stream with which sustainable alternatives can be rewarded. Other tools, such as deposit return schemes (DRS), tend to increase the amount of materials collected, and have the capacity to collect material streams considered hard to reach, in particular takeaway food and drinks packaging.\(^\text{13}\) DRS for longer-life items such as mobile phones can help the local economy by creating local jobs and by strengthening European industry.

Suggested initial list of 10 items

1. **Bottle caps** are one of the top ten most littered items in the marine environment. Even in places where there are high collection rates for plastic bottles, there tends not to be any specific scheme to ensure the lids of the bottles are also collected, which is why targets are essential for this item. Some potential tools that could help MS could include the use of reusable bottles hand in hand with the spread of public water fountains, the introduction of deposit return schemes for the lids (as well as the bottles), or making it obligatory for the bottles put on the market to be designed so that the lid cannot be unattached from the bottle, as seen in the ‘leash the lid’ bill in the USA.

2. **Bottles** can also benefit from a reduction target, which can easily be met by introducing the widespread use of public water fountains and reusable bottles, offering pitchers of tap water in restaurants, in addition to having water dispensers in conference venues, 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 high.\(^\text{14}\) A reduction target for single-use nappies would provide the right incentives to develop reusable nappy schemes across Europe, such as laundry services, hence 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 them reusable and, at the end of their useful life, recyclable.

4. **Microplastic ingredients** need to be banned across Europe by 2025. For many of the products where microplastics can be found, alternatives exist, and considering the health, environmental and economic damage they cause, there is no excuse for the EU not to lead globally by taking action. At the moment, some MS are already introducing some bans on microplastics in some products. In order to ensure a level playing field for all companies across Europe, the ban should come from the EU and should include products where they have been added on purpose.

5. **Cigarette butts** are one of the most littered items in the marine and land environment, and considering the pollution potential, a reduction target for these could have great potential. Some options are the introduction of deposit return schemes, in order to ensure a high collection rate, while other options are the use of reusable filters or even the possibility of not using them, as evidence suggests that cigarette butts have little or no health benefit to the smoker.\(^\text{15}\)

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

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\(^{12}\) The ban should apply to all microplastic ingredients, which should be defined as all solid water-insoluble microplastic ingredients of 5mm or less in any dimension used for any purpose. There should be no lower size limit included in the definition, and it should cover all plastics, rather than a list of specifically prohibited plastics or specific ingredients used for a particular function.

\(^{13}\) ERM Review of Packaging Deposits System for the UK, 2008

\(^{14}\) In places such as Capannori, the first Zero Waste municipality in Italy, nappies represent 15% of the residual waste


\(^{15}\) https://www.newscientist.com/article/mg22229750.200-time-to-kick-cigarette-butts-theyre-toxic-trash/
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7. **Hygiene products**, including toothbrushes, cotton buds, single-use shavers and feminine sanitary items. Many single-use items under this category could easily be replaced with already-existing alternatives, such as ear spoons instead of cotton buds, menstrual cups instead of single-use feminine towels or tampons, toothbrushes with a replaceable head, and reusable shavers.

8. **Very lightweight plastic bags** (below 16 microns) have recently been banned in Italy, where alternative ways of packaging food, especially loose fruit and vegetables, can already be seen. The European network of packaging-free shops also offers many real-life examples of how each type of food item can be packed avoiding single-use plastic applications, including lightweight bags.

9. **Expanded polystyrene** has incredibly low recycling rates, and its health impact is well documented; therefore, as a material, it should be banned by 2025. Refillable, reusable food containers should be promoted for its food and drink applications (see point 6), and cardboard as well as mycelium should be used for its other uses, such as packaging.

10. **Carpets**, which are mainly made of plastic, have a recycling rate below 3% in the EU, a great part of this being down-cycling. Taking into account that 700 million square metres of carpets are placed in the European market annually, the scope for improvement is massive. Better design for small repairs, reuse and recycling (for example, not including glue in the carpet) as well as introducing deposit return schemes will immediately have a significant impact on the reduction of carpet use and the appropriate management of it at the end of its life.

This list is not exhaustive, since many other items should be included, such as single-use plastic straws, food wrappers (crisps, sweets), drink stirrers, bottles and plastic trays, and we would welcome action on all of these.

Final recommendations

1. Avoid paralysis by analysis: the data collection on plastics should be significantly improved by introducing a standardised method of gathering data on plastic put on the market, collected as waste and its management. However, this should not be an excuse to avoid action, since addressing the use of plastic and its negative consequences needs to be done as a matter of urgency. The proposals above offer the possibility of moving forward while data are collected and a set of targets and a baseline are developed for the next few years.

2. No material is better than another material: the objective of a strategy aimed at reducing plastic overconsumption should be to reduce our environmental, social and economic impact, and never to transfer the externalities to other materials and communities. As a net importer of materials and products, the negative environmental impacts of Europe’s consumption are felt outside its borders. Shifting Europe’s dependency from one raw material (in this case oil or biomass) to another (such as wood, metals, etc) only results in a shift of the impacts of our consumption, and our waste.

For more information

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ZWE is a member of the Rethink Plastic alliance, part of the Break Free From Plastic global movement, which includes more than 800 organisations around the world rethinkplasticalliance.eu  @RethinkPlastic

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