

## **Position of the Union of Entrepreneurs and Employers on the proposed text of the directive on the reduction of the impact of certain plastic products on the environment**

**The draft Directive on disposable plastic products by the European Commission raises strong concerns of the business community. In the long-term, it will affect many Polish entities in a strongly negative way, significantly worsening their situation.**

It should be noted that the original proposal raises far-reaching concerns, but the situation is getting even more dangerous, as in recent weeks there has been a significant tightening of the course taken. Members of the European Parliament have made numerous amendments, two of which disproportionately and in an ill-considered manner hit the Polish tobacco industry. This is important inasmuch as in this industry Poland has a strong competitive advantage over other EU markets, both in terms of production volume as well as the size of investments and employment. The concerns about the shape of the draft Directive and the amendments tabled is only reinforced by the fact that the vote in the Committee on Environment, Public Health and Food Safety (ENVI) will take place on 10<sup>th</sup> October while the works in both the Council and the European Parliament are held on the principle of the so-called “fast track”.

The first amendment proposed by EU parliamentarians concerns the introduction of additional information obligations for manufacturers of tobacco products regarding appropriate methods of disposal of garbage, the effects of illegal littering, and information about the presence of plastic in the product. One must note that the appearance of a cigarette pack is already regulated by numerous legal acts. Relatively recently, the appearance thereof has been significantly interfered with, imposing on manufacturers the obligation to put health warnings on the packaging of tobacco products relating to the effects of tobacco use. The proposal to impose additional obligations on manufacturers of tobacco products in terms of informing about the proper ways of disposing of garbage, the consequences of illegal littering, or the content of plastic in the product, raises legitimate objections. It must be emphasised that the European Commission took the above-mentioned conditions to be considered when designing the directive in its current shape.

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The second amendment aims to reduce the use of cigarette filters, i.e. of the elements that have a key health impact as far as the product goes, which is to limit the amount of harmful substances that end up in consumers' organisms. The observance of acceptable concentration levels of certain substances (resulting from legal acts of the European Union) requires the use of filters with appropriate properties. It must be highlighted that despite of the fact that many studies have been conducted over the years, one has yet not managed to find an appropriate substitute for the currently used cigarette filters. Any limitation to the possibility of using filters is therefore tantamount to an adequate limitation of the production and sales of tobacco products. In practical terms, this would entail a real risk of production reduction or even closure of factories of tobacco producers in Poland. In the tobacco industry, there would be reductions of employment, while the revenues to the state budget due to excise tax on tobacco products would be significantly reduced. It seems that the scale of the potential negative effects of accepting the amendments proposed by Members of the European Parliament is large enough to clearly oppose them.

In recent years, Western European countries moved the production of tobacco products to the east, primarily to our country. Polish factories, serving hitherto the our local market, started to manufacture products for exports – in total to a several dozen countries. Poland became the industry leader. Presently, the Western European countries are pushing the solutions described above, which will result in the elimination of the established market position of Polish factories, as well as the mass dismissals of tobacco industry employees.

We recognise the need of legislation and the importance thereof, aimed at reducing the amount of plastic in the natural environment. However, we would count on actions to be undertaken that represent a wider socio-economic compromise.

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