

Referring to the Proposal for a Directive of the European Parliament and of the Council on the reduction of the impact of certain plastics products on the environment (COM(2018)0340 – C8-0218/2018 – 2018/0172(COD)), also known as the Directive on plastic waste or, in other words, the Single-Use Plastics Directive (SUPD), we would like to raise the following issues, complementary to the hitherto provided commentary:

1) Definition of plastic

The amendments adopted by the European Parliament only partially relate to the definition of “plastics”, as it still covers all polymeric materials. This is problematic, since all plastics are polymers, but not all polymers are plastics. The present definition – due to the fact that it is very wide – may limit, among other things, the innovative initiatives that can be carried out in order to develop polymer-based alternatives that are not plastics and do not behave in the environment in the same way that plastics do. The inappropriate definition of “plastics” will negatively affect innovation, which is why we postulate it ought to be narrowed.

2) Definition

In the current wording, the Directive requires Member States to “significantly” and “permanently” reduce the use of plastic cups. We are concerned that the scope of the use reduction target is unclear and could potentially include paper cups having a thin layer of plastic that helps to prevent the beverage from leaking out. Without clear definitions of scope, this measure can have serious unintended practical and economic consequences for the food industry. Paper cups with a thin layer of plastic can be recycled using appropriate infrastructure. Through appropriate collection and recycling systems, paper cups with plastic layers are a valuable commodity. Collection and recycling targets, rather than consumption-reducing targets, will support the creation of European value chains that foster a real circular economy. According to the explanatory memorandum of the **European Parliament Committee on Economic and Monetary Affairs to Amendment 6** “Polymeric coatings, claddings, and layers have a hygienic function and ensure food safety in multi-layered multi-material products and are not capable of functioning independently as the main structural components of final materials or products, nor can they be used in the case of lack of other materials as the main structural component”.

If the text of the directive is adopted as it stands, the lack of clarity as to whether the underlays and layers in paper cups will be part of the reduction target will make a large part of the food industry unable to meet the requirements of their customers. In order to ensure business continuity, while working on innovative solutions, we propose including a clearer definition of the underlay / layer in the directive, as proposed by the European Parliament Committee on Economic and Monetary Affairs.

Subject 8

Text proposed by the Commission

Amendment No 6 proposed by ECON

(...) Certain polymeric materials are not capable of functioning as a main structural component of final materials and products, such as polymeric coatings, paints, inks, and adhesives. Those materials should not be addressed by this Directive and should therefore not be covered by the definition.

(...) Certain polymeric materials are not capable of functioning as a main structural component of final materials and products, such as polymeric coatings, **underlays or layers**, paints, inks, and adhesives. Those materials should not be addressed by this Directive and should therefore not be covered by the definition.