

Mr Thomas Oberreiter
Deputy Permanent Representative
Permanent Representation of Austria
Avenue de Cortenbergh 30
1040 - Brussels
BELGIUM

29 October 2018

Dear Ambassador,

On behalf of European business across the board, I am writing you to express our deep concerns regarding certain proposals made by the European Commission and Parliament on the reduction of the impact of certain plastic products on the environment.

We fully support the objective to prevent plastic waste, or any waste for that matter, from ending up in our streets and oceans. Many companies share this objective and continue to provide and support solutions to solve this major issue. For example, they collaborate along the value chain to design products for recyclability, and work with governments and waste handlers to improve waste management systems. Others engage in voluntary take-back schemes to recycle close to 100% of plastic bottles. With all these industry-based actions already in place, it is unfair and disproportionate that the current proposals risk putting an endless financial burden on plastic producers as well as highly uncertain and unmanageable practical implications for Member States. In particular:

- **The current proposals risk continuing the problem of littering.** The fact is that plastic waste often ends up in our environment due to irresponsible consumer behaviour or inadequate waste management infrastructure, which is mostly beyond the control of plastic producers. Therefore, even if we switch to alternatives such as reusable plastics, paper or bamboo, if the issue of littering is not solved at its root cause, then what will prevent littering in the future? Furthermore, putting the full financial burden of clean-up costs on those who are not solely responsible for this major issue is not the solution. Instead, as is recognised in the recently revised Waste Framework Directive (WFD), the fight against litter requires a “shared effort between competent authorities, producers and consumers”. In other words, clean-up costs should be shared and an approach on how to deal with consumer behaviour should accompany this policy.
- **The practical implications and uncertainty of these proposals are deeply worrying.** For example, it will be highly uncertain how waste cleaners are going to distinguish between something being a single-use plastic as covered in the proposal or a multi-use plastic or non-plastic as not covered, and which share of the clean-up costs could be attributed then to cleaning up single-use plastics only. Secondary legislation could be a solution as it allows for more time to implement the Directive successfully on a product-by-product basis, and avoid market fragmentation.



In sum, you and your colleagues still have a chance to reach a fair agreement. Business fully understand its role in society to provide solutions for the plastic waste issue, and will continue to do so despite these worrying developments.

Yours sincerely,

Markus J. Beyrer