

The Consumer Voice in Europe

HOW TO BRING DOWN THE USE OF SINGLE-USE PLASTICS?

A consumer perspective



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Why it matters to consumers

Plastic waste threatens our health and our environment. More and more consumers are therefore worried to live in a throw-away society in which many plastic materials are only used once and/ or for a very short time. Yet, consumers often do not know how to reduce packaging waste in their daily lives. Public policies to reduce waste and facilitate re-use and re-cycling have therefore an important role to play to prevent and better manage waste.

Summary

The EU Commission has published a proposal for a Directive to cut the use of single-use plastic. Its main motivation is to protect the environment and human health. BEUC welcomes the proposal to cut down on single-use plastic through a mix of different instruments. These include banning plastic for certain uses, re-designing products, making producers responsible for the environmental impact and informing consumers about how to appropriately dispose of certain plastic containing items. European consumer groups suggest the following improvements:

- The Directive should clearly state in its objective that the terrestrial and aquatic environment need to be protected. Just focusing on the marine environment would be too limited.
- Additional measures should be taken regarding cigarette filters which contain plastic, currently not in the proposal. Member States should take additional measures to bring down the use of such filters and set up proper collection systems.
- Specific EU-wide reduction targets for food and beverage containers are needed.
- Deposit schemes for plastic bottles should be set up in all EU-countries where these do not yet exist to ensure a proper collection and recycling process of single-use plastic bottles. This should be mandatory and not be left to the Member States to choose as only one of the options.
- Prevent a shift to other single use items that are not adequately regulated, such as paper and cardboard used as food contact material.
- Prevent exposure to harmful chemicals which are used in re-useable plastics.
- In addition to introducing new labelling requirements, some misleading practices should be banned.
- Awareness rising measures need to be well targeted.
- The effects of the Regulation should be checked after four instead of six years.

1. Introduction

Plastic is ever-present in our lives. While it is often a cheap and practical solution, certainty is growing that we are paying a high price for this convenience with growing environmental pollution and increasing health problems. According to a recent Eurobarometer¹ which investigates attitudes of Europeans towards the environment, three in four Europeans are worried about the impact of plastic on their health and the environment.

There are many good reasons why to reduce the amount of plastic materials in our lives as much as possible: plastic contains harmful chemicals which leak into our food and drink. Moreover, plastic is made from fossil fuels, has a negative impact on the climate, stays in the environment for over 100 years and kills marine animals. The threat for the marine environment has been demonstrated by several documentaries such as '[A plastic oceans](#)' and a report of the Ellen McArthur Foundation which estimates that if no action will be taken now, there could be more plastic in the ocean than fish by 2050².

Waste treatment is problematic as only a minor part of all plastics is recycled and because toxic substances are released into the environment when incinerated or put to landfill.

Unfortunately, it is difficult to escape from this flood of plastic that surrounds us in our daily lives as very often no alternatives are offered when purchasing food and drink to go. Where they exist, such as for example re-fillable plastic drinking bottles and single-use plates made of other materials, they come along with health concerns: consumer testing has shown that they also may concern hazardous chemicals which can leak into food and drink³.

Without addressing current market failures through mandatory binding standards that will apply across the EU – including phasing-out certain uses and eco-designing certain products – it is unlikely that safer and more sustainable alternatives will replace plastic at large scale. For this reason, BEUC welcomes that the European Commission has engaged into a European Strategy on how to reduce plastic waste⁴.

We also welcome that concrete steps to reduce single-use plastic have been proposed for those areas where alternatives easily exist, such as replacing plastic in cotton buds with renewable sources such as paper or wood.

In this paper we will be commenting mainly on the draft Directive on the reduction of certain single use products. We will however also outline proposals for further work needed to complement this Directive in the areas of chemicals policy, food contact materials legislation and related to the Unfair Commercial Practices Directive.

¹ Special Eurobarometer 468 (2017): Attitudes of European citizens towards the environment. Summary, http://ec.europa.eu/environment/eurobarometers_en.htm.

² Ellen McArthur Foundation: [The new plastics economy – Rethinking the future of plastics](#)

³ See <https://www.forbrukerradet.no/side/drinking-bottles-leach-chemicals/> and https://www.oekotest.de/bauen-wohnen/20-Einweggeschirr-aus-nachwachsenden-Rohstoffen-im-Test_111087_1.html

⁴ European Commission: A European Strategy for Plastics in a Circular Economy. COM(2018) 28 final.

2. Aim of the Directive should point to pollution of lakes, rivers and soil

Article 1 of the Directive states as Objective to prevent and reduce the impact of certain plastic products on the environment, in particular the aquatic environment and human health. As plastic products also negatively impact inland waters and soil quality, the Directive's objective should state this clearly as follows:

*The objective of this Directive is to prevent and reduce **significantly** the impact of certain plastic products on the environment, in particular the aquatic **and terrestrial** environment, and on human health as well as to promote the transition to a circular economy with innovative business models, products and materials, thus also contributing to the efficient functioning of the internal market.*

3. Scope of the proposal

The European Commission proposes a mix of different instrument such as to ban and reduce the usage of certain products, to change their design, to better inform consumers through labelling and awareness rising, to introduce Extended Producer Responsibility schemes, to require separate collection and monitor the amount of single use plastic put on the market.

In addition, measures on fishing gear have been proposed. We consider these to be important as discarded fishing gear has a negative impact on the food chain in several ways. First, 'ghost' fishing reduces the amount of fish in the oceans and may in addition to problems for biodiversity also lead to price increases for consumers. Second, fishing nets have been found in consumer testing on sea food: they are therefore an important contaminant which needs to be eliminated.

BEUC supports in general such a mix of instruments which works through phasing-out and redesigning certain products and making producers responsible for the related environmental costs of their products.

Banning certain products as outlined in article five gives important signals to producers and retailers that a change in the way how we produce and consume is important. As alternatives are available to the products proposed by the European Commission we do not assume that the freedom of choice of consumers is negatively impacted: Alternatives can be made available without negative price hikes. As such alternatives exist, consumer organisations have been calling on supermarkets to only offer more sustainable products without plastic even before the Directive takes effect⁵.

Consumers should not get the impression that those bans are mere symbolic whereas the real problems of environmental pollution are not being effectively tackled. Consumers should also not get the feeling that the burden sharing is not fair as certain industries will receive too many exemptions whereas consumers are expected to make a change. To this end, it would be important to enlarge the scope of this Directive in the future.

⁵ See for example Test Achats: [Stop aux plastiques non réutilisables dans les supermarchés!](#) , 4 June 2018.

However, we are reaching the end of the term of office of the European Parliament and time matters to reduce environmental pollution. We prefer to achieve a successful agreement about this Directive in the coming months, rather than getting stuck in political discussions about the number of products being listed in the Annexes. The impact assessment of the Commission uses an analysis of beach sands to show the ten top pollutants. These should therefore be the major focus of this Directive.

The only item mentioned in the Commission's impact assessment but properly addressed is cigarette buds. They have been identified as the second most polluting single use plastic item on beaches. Consumers who litter in the environment may not be aware that cigarette butts contain plastic and are not bio-degradable. Indeed, most cigarette butts consist of the plastic microfiber cellulose acetate which does not easily decompose in the environment and which continues to release toxic chemicals for years.

However, just including cigarette butts into EPR schemes and consumer information campaigns may be insufficient to clean up beaches from those toxic left overs.

It would be important to adopt (preferably) EU-wide or (alternatively) national reduction targets for the use of plastic containing cigarette filters. Cigarette butt collection systems should likewise be set up at national level. Solutions for the recycling of cigarette butts are for example offered by the company TerraCycle who is specialised in recycling waste which is hard to recycle. They also run [programs with municipalities](#) to separately collect cigarette butts. Consumers can already purchase a box for the recycling of cigarette butts. However, this system might not be widely known and is with up to 130€ per recycling box still expensive for individuals⁶.

4. Defining reduction targets and setting targets for recycled content

Defining quantitative targets to achieve a reduction of single use plastic is indispensable. To this end, the Commission should request the Member States to set concrete and ambitious reduction targets for the single use plastics mentioned in Annex A within four years after the Directive has to be transposed. This seems reasonable as certain alternatives to single use plastic are already available or are in a test phase⁷. Article 4 should be amended as follows:

Member States shall take the necessary measures to achieve a significant reduction in the consumption of the single-use plastic products listed in Part A of the Annex on their territory by ... [~~six~~ **four** years after the end-date for transposition of this Directive].

~~Those measures may include~~ **The Member States shall fix ambitious** national consumption reduction targets, ~~measures ensuring~~ **and control their attainment.** **The measures must be suitable to ensure that** reusable alternatives to such products are made available at the point of sale to the final consumer.....

⁶ https://www.terracycle.de/de-DE/zero_waste_boxes/https-zerowasteboxen-terracycle-de-products-zigarettenabfalle-zero-waste-box

⁷ Company Recap offers re-useable coffee-to-go cups. In Switzerland some restaurants including at University campuses introduced a [deposit system for lunch boxes](#) and in Germany a supermarket chain is testing a deposit system for [re-useable plastic boxes for cheese and sausages](#).

In addition, the Directive should set a minimum percentage for recycled content in re-useable plastic packaging. This would meet consumer expectations for more sustainable 'To-go' packaging⁸. To this end, paragraph 2 of Article 4 should be amended as follows:

The Commission ~~may~~ **will** adopt an implementing act laying down the methodology for the calculation and verification of the significant reduction in the consumption of the single-use plastic.... That implementing act shall ~~be adopted in accordance with the examination procedure referred to in Article 16(2)~~ **set concrete targets for the different products in a staged approach.**

5. Preventing a burden shift to other single-use materials

Just banning single use plastic materials without setting design requirements for the potential alternatives entails the risk shifting the current waste crisis, rather than providing a solution for it.

In the absence of such binding requirements, it is likely that single use plastic will be replaced by other single use materials, which are not necessarily better for consumers health and the environment and therefore fail to offer more sustainable solutions.

From an ecologic point of view, it has to be emphasised that the production, shipment and waste treatment of other materials made of paper, cardboard or other renewable resources (e.g. bamboo) create considerable amounts of CO₂ emissions. Therefore, just replacing single use plastic with other single-use materials does not lead to more sustainable production and consumption patterns.

The Directive must require Member States to adopt additional measures that prevent a burden shift. This can for example be achieved by a fee on 'to-go' packaging, irrespective of which material has been used. Like this, real incentives would be created to adopt more and more solutions which are based on reusable materials rather than single use.

To this end, article 4, number one, paragraph 2, last sentence should be adjusted as follows:

Those measures ~~may vary depending on the environmental impact of the products referred to in the first sub-paragraph.~~ **shall be suitable to avoid a burden shift towards other materials with an inferior life-cycle assessment.**

6. Ensuring safe use of alternatives to single-use plastic

As one of the major goals of this Directive is to protect consumers' health, much attention must be given to the possible replacements to single-use plastic. Unfortunately, EU legislation governing the safety of food packaging other than plastics – such as paper and cardboard – is fundamentally underdeveloped. In 2012, the Commission thus concluded that for materials other than plastics insufficient mechanisms exist to ensure that they are safe for the consumer.⁹ The Commission's Joint Research Centre last year likewise published a comprehensive overview of the regulatory gaps for non-plastic food packaging

⁸ As has been demonstrated for example by a survey of BEUC's German member vzbv: Forsa (2017): Verpackungsabfälle, <https://www.vzbv.de/pressemitteilung/verbraucher-wollen-mehr-unverpackte-lebensmittel> and https://www.vzbv.de/sites/default/files/charts_verpackungsabfaelle.pdf

⁹ European Commission, Roadmap: Food Contact Materials - Specific provisions for materials other than plastics – implementing measure. July 2012.

materials.¹⁰ Likewise, the European Parliament in October 2016 adopted a resolution asking the Commission to regulate paper and cardboard that comes in contact with food¹¹.

The importance of looking into the alternatives has also been highlighted by German test magazine Öko-Test which demonstrated that single-use table wear made of alternatives to plastic (such as palm tree leaves) often contain pesticides, mould, mite excrements, bacteria or emitted an unpleasant smell which makes it difficult for consumers to enjoy the food¹².

BEUC members from Belgium (Test-Achats/Test-Aankoop), Italy (Altroconsumo), Denmark (Danish consumer council), Spain (OCU) and Portugal (DECO) have analysed 65 samples of fast food packaging from across the EU showing that:

- In almost all samples the amount of fluorinated compounds exceeds a limit value which is recommended by the Danish food safety authorities.
- High levels of problematic fluorinated compounds were found in one third of the sampled products. Some are on the EU's list of Substances of Very High Concern, such as perfluorooctanoic acid (PFOA), a chemical that damages fertility and harms unborn children.
- Fries packages were the ones that contained most substances.

An often-promoted alternative to single use plastic is reusable plastic. While reusable food and beverage containers can indeed help to limit waste generation, much attention needs to be given to the quality and safety of such plastic. First, irrespective of being made of virgin or recycled content, all plastic needs to be fully safe. Second, there are hazardous chemicals present in plastic today that are not needed for its production, but which can leak into food and drink.

Researchers¹³ have identified over 4000 chemicals that are potentially present in plastic packaging. Of the 908 chemicals likely to be present, 68 chemicals were identified as being most hazardous for the environment and 64 were identified as being most hazardous for human health. However, for many of the other chemicals on the list not enough is known about their potential impact on human health and the environment.

Thus, the EU needs to do much more conceptual work in relation to the chemicals, products, waste interface¹⁴, while more intensive market surveillance needs to be carried out to ensure compliance with the EU's food contact material's legislation.

Consumers should also receive more transparent information about the chemicals being used in re-useable plastic packaging.

¹⁰ JRC, Non-harmonised food contact materials in the EU: Regulatory and market situation. January 2017. <https://ec.europa.eu/jrc/en/publication/eur-scientific-and-technical-research-reports/non-harmonised-food-contact-materials-eu-regulatory-and-market-situation-baseline-study>

¹¹ Our letter to the Members of the EU Parliament and its annex and [BEUC's input to the restriction proposal on PFOA](#)

¹² https://www.oekotest.de/bauen-wohnen/20-Einweggeschirr-aus-nachwachsenden-Rohstoffen-im-Test_111087_1.html

¹³ See <https://www.foodpackagingforum.org/about-us/research-project>

¹⁴ See our recommendations '[How to detoxify the circular economy](#)'

7. Standard setting and labelling requirements

7.1. 'Bio-plastic'

Packaging made of 'bio plastic' are advertised to the consumer as being environmentally friendly. Yet, many of these plastics degrade as slow as conventional plastic. While national and international standards have been agreed to set rules on biodegradability in industrial and home composting¹⁵, we underline that such materials are unsuitable to substitute plastic packaging. The conditions described in the standard often deviate from real life conditions. Consumers purchase such products which are even often more expensive in the belief that they are environmentally friendly. This may lead even to an increase of littering as consumers see disposing off such materials in the environment as harmless. The European Commission announced in its plastic strategy to propose harmonised rules for the criteria and labelling of biodegradable and compostable plastics. Such measures need to be taken when this Directive takes effect to ensure that market players do not shift to other products whose ecologic advantage is not proven. The consumer must have the certainty that labelled products indeed have such properties and not only in a limited way or under certain conditions.

7.2. Labelling 'Not to be disposed of in the environment'

Sewerage companies observe frequent disposal of certain products such as wipes and women's hygiene products through the sewage system. This not only leads to unnecessary costs for removing blockages into the sewage system but also burdens the environment as not all parts or substances can be reliably filtered out or dissolved. As considerable investments into the waste water system would be necessary to improve the current situation, consumers would be faced with increasing costs. For this reason, well-designed labelling requirements should be introduced as a first measure to increase awareness and incentivise behavioural change. To this end, the Commission should ban certain claims that advertise wet wipes as being 'easily flushable and biodegradeable' as such claims could result in more littering.

7.3. Labelling single use and re-useable beverage containers so that consumers can see the difference

A clear labelling of single use and reusable packaging is useful as it may contribute to a reduction of the amount of single use plastic. Today, consumers are often unsure if a beverage comes in single use or reusable packaging. A coherent and legally binding labelling for reusable beverage packaging is missing.

In some countries which make use of a deposit refund scheme for beverage bottles, the labelling is often in such small print and not in a prominent place on the label which makes it difficult for consumers to identify the instructions.

Reusable packaging should receive a positive image among consumers. A pictogram or symbol with signalling effect should be developed and become mandatory for all products mentioned in Part A and C of the Annex. Ideally such a pictogram would be consistent across the EU but contain national language.

¹⁵ Such as for example EN 13432.

Article 7, number 1 letter b should be amended as follows:

The negative environmental impacts of littering or other inappropriate waste disposal of the products, **in particular through sewage systems**, or...

Paragraph 2 should be clarified as follows:

The Commission shall, by ... adopt an implementing act laying down the specifications for the marketing referred to in paragraph 1. That implementing act shall **develop for the beverage containers listed in Part C of the annex a visible, legible and ineradicable labelling with consumer information if the container is for single use or reuse. While the graphic image should allow for recognisability across the EU, national languages should be used to ensure consumer understanding in the respective EU Member States. The implementing act shall also define which labelling practices should be banned as they are misleading.** (....)

8. Extended producer responsibility

BEUC welcomes proposals to hold manufacturers financially responsible for the collection and waste treatment of the products they place on the market as this is in line with the polluter pays principle. Because of the increasing amount of litter in the marine environment, Extended Producer Responsibility schemes need to apply to the clean up of oceans too.

As through the increasing use of 'to-go' packaging the amount of waste increases in large cities, the producers of such single use packaging must be responsible and contribute to the financial burden, including for the terrestrial clean up. Just leaving all costs to the tax payer would neither be fair nor steer towards more sustainable solutions. The Directive does not describe how cost splitting could look like. That should be further specified. To this end, it is also important to have a clear overview of the amount of plastic waste in the terrestrial and aquatic environment. To this end, article 8, number 2 should be amended as follows:

(2a new): The Member States will ensure a regular monitoring of the type and amount of plastic waste in the aquatic and terrestrial environment. The indicators must be designed to allow for conclusions about the costs for cleaning up single use items mentioned in Annex Part E.

9. Reduction targets for separate collection

The European-wide introduction of separate collection for beverage packaging is useful and has already proven to be successful for example in Germany. However, avoiding waste should be the priority for products mentioned in Annex Part E. To this end, the Directive should foresee legal measures to increase the amount of reusable packaging and to reduce single use packaging through the mandatory introduction of a deposit-refund scheme. Leaving Member States the choice among a deposit-refund scheme and a separate collection as currently foreseen in article 9 may fail in many countries to bring the amount of single use plastic beverage containers down.

The title of article 9 should be changed to 'separate collection and reduction targets for single use plastic usage'

A new paragraph should be added to article 9:

The Member States define for plastic beverage containers an ambitious and binding re-use quota. Non-compliance will be subject to sanctions. The quota may be increased in a staged approach over time.

10. Awareness rising measures

An important factor for the successful implementation of this Directive will be the motivation of consumers to dispose of used items adequately and to accept deposit-refund schemes, reusable beverage containers and separate collection. While according to Eurobarometer surveys consumers across the EU are concerned about plastic waste and its negative impact on their lives, they lack detailed knowledge and clear information on how to adapt their behaviour in practice.

A study published by BEUC's German member vzbv in relation to the ban of single use plastic bags shows this clearly: 47% of respondents to a survey mistakenly thought that single use bags made of recycled paper are a very good alternative to single use plastic bags whereas only 34% thought so for re-useable bags made of recycled plastic even though the latter ones might be better for the environment as they are reusable. It will be important to explain to consumers which impacts different ways of consumption have on the environment and on health. Such information needs to be targeted to different groups and distributed through different channels.

Consumer groups already contribute to many awareness rising measures related to the products mentioned in the scope of the Directive:

Through the International Consumer Research and Testing network, four consumer organisations (Austria, Belgium, Denmark and Spain) tested microplastic in sea salt and in sea fruit. Based on the tests, consumers have been informed in the respective countries in 2018:

- The [Austrian VKI](#) reported in June 2018 about sea salt contaminated with microplastic. Six out of eleven sea salts contained plastics. Most particles were below 0.1 mm. In most cases no origin was indicated but where it was present, the Mediterranean Sea was mentioned most times. VKI could not conclude on a correlation between plastic in the salt and its packaging. Thus, the plastics end up in the products through environmental pollution.
- The [Danish Forbrugerradet](#) also reported about microplastic in salt and published in its June 2018 magazine Taenk an article on microplastic in sea salt and sea fruit. Over 70% of the tested samples contained microplastic. The main contaminants were coloured microfibers which suggests that the source might be from either textiles or fishing gear. The article also gives practical tips to consumers on how to reduce their negative impact. Consumer knowledge about microplastic has been tested through a consumer panel of 3.600 people. This article was the most read article in the magazine and the article readers engaged with most.
- As similar article has been published by Test Achats/Test Aankoop in its June magazine. Following the announcement of the European Commission to ban certain single-use plastics, [Test Achats](#) has called on retailers on 4 June 2018 to already do a change before the future EU law applies as the EU legislative process is long and we have no time to lose.

- The Italian Altroconsumo reported in its June magazine in addition to the above-mentioned test results also about plastic waste in the sea and how it impacts animals.

Consumer organisations also help consumers with practical tips on how to better sort waste and how to reduce their plastic footprint:

- The UK consumer organisation [Which?](#) published in its August 2018 magazine as cover story 'How to reduce your plastic footprint'. The article informs consumers on how to use less plastic. It explains common plastic types and their uses as well as labelling. Which? also tested how easy packaging materials of different supermarket chains are to recycle. The article also contains practical tips on what consumers can do to reduce their plastic footprint, such as avoiding black plastic which is often not recognised by sorting machines in recycling facilities, screwing lids back on bottles to avoid them falling through the sorting, squashing bottles to stop them rolling off the sorting belts and leaving materials back at the point of sale.
- The German Consumer Centers, members of vzbv, have an [information page](#) for consumers about how plastic waste ends up in the seas and what can be done to avoid it. They also give practical information to consumers on how to reduce plastic [in their daily lives](#).
- The [French UFC Que Choisir](#) regularly advises consumers on how to better sort waste and how to reduce waste.

Consumer organisations also test alternatives to single use plastic and make it known where the quality has to be improved to keep consumers safe:

- The [Norwegian Consumer Council](#) highlighted through a test of refillable drinking bottles that re-useable plastic items are not necessarily more advantageous for consumers' health than single-use plastic. While only in low quantities, the refillable bottles contained phthalates, Bisphenol A and flame retardants which could leak into the drink. As the bottles are used by children at kindergarten or school every day, it may contribute to exposure to hazardous chemicals including the ones that negatively impact the hormonal system. As the chemical content varied a lot between different bottles, and some are certainly not necessary to produce the bottle, consumer organisations show the need for a different way of producing.

Consumer organisations also test hygiene products and give recommendations about more environmentally friendly alternatives:

- The Austrian VKI tested [silicon cups](#) which are a reusable alternative to tampons and pads. The test included a check of the chemical composition, indications about the price and a user test.
- UFC Que Choisir has been [testing chemicals in nappies](#) and explained in its October 2018 magazine the multiple layers of plastic of nappies to consumers as many parents are unaware that nappies are not made of cotton fibres but from cellulose and plastic.

- BEUC participates actively in the criteria setting process for the EU Ecolabel. BEUC members are involved in the criteria development of national and regional ecolabels: German VZBV in the Blue Angel, Austrian VKI in the Austrian Ecolabel and Danish Forbrugerrådet Tænk, Norwegian Forbrukerrådet and Swedish Sveriges Konsumenter in the Nordic Swan Ecolabel. Thanks to these labelling schemes consumers find credible information about alternative materials to single use plastics.

Consumer organisations also inform consumers about the financial and practical consequences of flushing rigid items through the toilet:

- Austria's VKI informed consumers in its [September 2018 magazine](#) about the increase of waste water fees through littering. VKI gave practical advice that rigid items such as textiles, cotton pads, cigarette butts, nappies, pads, condoms, cat litter, wet wipes, fats, oils, paints, food waste, mortar and cement should not be flushed down the toilet to avoid an accumulation in the pipes and avoiding damage to the waste water treatment plants. They also gave information to consumers about local government actions that seek to prevent littering through the toilet.

Consumer organisations also check consumers knowledge and opinions through surveys.

- Germany's vzbv released in [September 2018 results](#) which demonstrate that consumers have important knowledge gaps related to the environmental impact on the environment. Related to the question 'Which products do not burden the environment because they decompose in water and nature?' the following answers were given: materials labelled as biodegradable or compostable (75%), wet wipes (31%), tampons and pads (24%), cigarette butts (21%), balloons (12%).

The examples show that consumer organisations are interested and can make an important contribution to communicate about the problems around single use plastic. However, based on consumer organisations experience and for the awareness measures to be effective, Article 10 should be amended as follows:

Member States shall take measures to inform consumers **taking into account the needs of different target groups** (...)

A new paragraph c) should be introduced:

- the necessity of limiting and reducing products listed in Annex G and respective more sustainable alternatives.

11. Evaluation and review of the measure after four instead of six years necessary

Four years should be sufficient to evaluate for a first time the impact of this Directive as important innovations in the area of packaging systems and materials can be expected.

Article 15 should be amended:

The European Commission shall carry out an evaluation of this Directive by (~~six~~ **four** years after the end-date for transposing this Directive).

An indicator to evaluate the impact on terrestrial environment needs to be developed. To this end, Member State should be obliged to collect and make data available that evaluates terrestrial plastic pollution.

Article 15 paragraph number three letter c) should be amended:

(...) or a standard for biodegradability in the ~~marine~~ **aquatic and terrestrial** environment (...)

12. Outlook for future work

It must be emphasised that the Directive on reducing single-use plastic is only very limited in scope and a first useful step. More action will be necessary to go beyond symbolic politics and to start a broad approach that seeks to cut plastic consumption at large scale, not only for single-use items. Like in international climate change negotiations, the EU should take a leading role in the coming years at global level to drive this agenda against plastic pollution in the environment forward.

While not in the scope of this Directive, the European Commission must take additional measures in the coming years to further reduce the amount of single use plastic and to prevent the entry of microplastic into the environment. To this end, BEUC supports the following measures:

- Regularly reviewing the Directive to possibly enlarge its scope in the future to more single use plastic products. The review should take into consideration the health effects to consumers from hazardous chemicals in plastic, in particular endocrine disrupters.
- Banning intentionally added microplastic in consumer products such as cosmetics, paints and detergents by 2020. To this end, the REACH restriction process should have a wider scope and not be limited to only few uses.
- The EU should adopt additional measures to prevent the unintentional release and entry of microplastic into the environment. This must comprise the terrestrial and aquatic environment. Areas to look at are textiles, tyres and pre-production pellets¹⁶.
- The EU must regulate the safe use of recycled paper and cardboard under the EU's food contact materials legislation. As such requirements do not exist today, there is a risk that consumer exposure to harmful chemicals will increase due to a shift from plastic to unregulated materials.
- The Unfair Commercial Practices Directive has clarified in its updated guidance documents the rules that apply to misleading environmental claims. The Member States should monitor the whole area around 'bioplastic' and other replacement materials that may be used to substitute single-use plastic. Joint enforcement actions by Member States market surveillance authorities, coordinated by the European Commission, should be foreseen in case the use of misleading green claims will spread in this area.

ENDS

¹⁶ Marine Pollution Bulletin(2018): The unaccountability case of plastic pellet pollution, <https://reader.elsevier.com/reader/sd/pii/S0025326X18300523?token=1C10B4835F4DA51181C8ED3713BE2B98273FC42BC6126A6B09531FBDA793A22310A7F45AA9DB6ED57835345E9A7ED36F>



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