



Brussels, 15 March 2021

To the kind attention of

Mrs Ursula von der Leyen, President of the European Commission

Mr Frans Timmermans, Executive Vice President of the European Commission in charge of the European Green Deal

Mr Thierry Breton, Commissioner for Internal Market

Mr Virginijus Sinkevičius, Commissioner for Environment, Oceans and Fisheries

In copy to participants of the TAC on SUP

Ref: Draft Guidelines on the Single Use Plastics Directive

Dear President,

Dear Executive Vice-President,

Dear Commissioners,

The present letter is sent on behalf of European Plastics Converters in reference to the letter signed by a group of MEPs, dated February 11th, 2021 [**Annex 1**] since it contains a list of wrong and/or incomplete information against reusable tableware made by plastic, crockery, glass and metal in relation to the application of the Directive no. 2019/904 on the reduction of the impact of certain plastic products on the environment.

We share certain comments contained in the letter and at the same time we are puzzled to read among its authors MEP Antonio Tajani, who was the President of the European Parliament when the Directive was approved by the Parliament. As said, we agree with the Members of the European Parliament on the need to better define and reduce the scope of the draft Guidelines of December 2020, but few observation are necessary elements.

First, the letter lacks indications on how the comparative study was conducted, although certified. The citation of comparative studies must always give the reader the opportunity to verify the information in the statements and the objectivity of results. Interestingly, the Study cited is a work of Ramboll that has been commissioned by EPPA, the European Paper Packaging Association¹. And, it appears to have been

¹ EPPA Press Release of January 11th, 2021 "*Ramboll's new European Study: Single-use paper-based packaging in quick service restaurants is better for the environment than reusable tableware*", available here <https://www.eppa-eu.org/general/press-release-european-paper-packaging-alliance-12-january-2021.html> [**Annex 2**].



conducted by comparing the paper-based products to different typologies of packaging except 100% plastics products. Many independent studies² have shown **how 100% single use plastics in quick service restaurants performs better than paper-based products**. Not to mention, the better recyclability performance of the former versus the latter.

From the same paragraph, more serious concern arises from the information that *“Paper single-use dishes are sourced and manufactured in Europe, opposite to plastic, ceramic or glass dishes that are sourced and/or manufacture out of Europe, mostly in Asia and China”*: this statement is completely false since single use products available in Europe are produced by European converters, **with Italy being one of the first producers in the EU for SUP dishes** and similar products.

Second, the **intention of the Legislator has always been to tackle the presence of plastics** in certain types of packaging and the **related littering problem**, thus having in mind paper products coated with plastics which have the same potential of being discarded as plastic products, if not higher since they can be perceived by consumers as being made of 100% paper and hence *“greener”* than 100% plastics product. In reality, the majority of single use paper-based products have a plastic barrier, without which they cannot function. Not to mention that paper-based products only exist in their single use model since they cannot be reused.

Third, on the concept of *“main structural component”*, we think this is a concept that requires no further comment because the draft Guidelines, as elaborated so far already contain, the best and logical interpretation possible which is in line with the will of the Legislator. **The Directive targets any single use products or packaging that contains plastics, irrespective of percentage** and this can be inferred by the overall objective of the Directive, its Preambles and Article 3.

We also share that it is of utmost importance to design a set of guidelines in line with the Circular Economy's original concepts, which are sustainability, recyclability, right information to the consumers and fight against unverified green claims as well as use of Life Cycle Assessment to ultimately clarify which products are better for the environment.

Therefore, in the light of the above, plastics converters hope you can take these observations into account. With much criticism, we have never been fond of Directive at stance, but **we have always appreciated the even playing field for different products and the need to avoid that any percent of plastics ends up in the environment**.

² Danish Environment Protection Agency *LCA of Single Use Plastic Products in Denmark* https://backend.orbit.dtu.dk/ws/portalfiles/portal/195360360/2019_LCA_of_Single_Use_Plastic_Products_in_Denmark_Environmental_Project_No_2104.pdf; Lifecycle Initiative *Single-use plastic bags and their alternatives: Recommendations from life cycle assessments* <https://www.lifecycleinitiative.org/single-use-plastic-bags-and-their-alternatives-recommendations-from-life-cycle-assessments/>.



Thanking you for your time and consideration, EuPC and National Plastics Associations remain at your disposal to provide any document or answer any questions you might have.

The undersigned National Plastics Associations are as follows (in alphabetical order):

 Agoria	 AHPI
 Asociación Española de Industriales de Plásticos ANAIP	 Associação Portuguesa da Indústria de Plásticos APIP
 British Plastics Federation British Plastics Federation	 BAP BRANCH ASSOCIATION POLYMERS Bulgarian Branch Association Polymers
 HRVATSKA GOSPODARSKA KOMORA Croatian Plastics Association	 Cyprus Plastics Processors Association
 Plastikářský klastř Czech Plastics Cluster	 Plastindustrien. Branche foreningen for danske plastvirksomheder Danish Plastics Federation
 NRK Dutch Federation of the Rubber and Plastics Industry (NRK)	 elipso Les entreprises de l'emballage plastique et souple Elipso



 <p>essencia PolyMatters essencia vzw/asbl Essencia PolyMatters</p>	 <p>FCIO KUNSTSTOFF FCIO Kunststoff</p>
 <p>Norsk Industri Federation of Norwegian Industries Federation of Norwegian Industries</p>	 <p>IK IK Industrivereinigung Kunststoffverpackungen e.V. Industrivereinigung Kunststoffverpackungen e.V.</p>
 <p>+ KUNSTSTOFF .SWISS KUNSTSTOFF.swiss</p>	 <p>LINPRA Engineering Industries Association of Lithuania LINPRA</p>
 <p>IKEM Innovations- och kemiindustrierna i Sverige Swedish Plastics Association</p>	 <p>PAGDER 1969 Plastik Sanayicileri Derneği PAGDER</p>
 <p>PAGEV TÜRK PLASTİK SANAYİCİLERİ ANLARIYI, GELİSTİRME VE KÖRFEZİ VAKFI PAGEV</p>	 <p>Polski Związek Przetwórców Tworzyw Sztucznych Polish Union of Plastics Converters</p>
 <p>Polymer Technology Ireland ibec Polymer Technology Ireland</p>	 <p>POLYVIA Union des transformateurs de polymères Polyvia</p>
 <p>FEDERAZIONE GOMMA PLASTICA Unionplast Unionplast – Federazione Gomma Plastica</p>	 <p>EUPC European Plastics Converters</p>