



## **Public Consultation on the establishment of a quantitative reduction headline target for marine litter - EUROPEN contribution-**

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### **Introduction**

On behalf of the packaging supply chain, EUROPEN<sup>1</sup> welcomes the European Commission's (EC) public consultation to tackle marine litter, in line with the objectives set in the 7<sup>th</sup> Environment Action Programme (7EAP) and the Resource Efficiency Roadmap.

EUROPEN supports the targeted multi-stakeholder approach to address the complexities of marine litter. While the packaging supply chain is not one of the key stakeholders addressed in the public consultation, EUROPEN wishes to raise three key points in this separate note for the Commission's consideration.

The packaging supply chain has over 20 years of experience in the area of (packaging and food) waste prevention and reduction. Source reduction has been a legal requirement since the Packaging & Packaging Waste Directive (PPWD) was adopted in 1994 and over the two decades a decoupling of packaging production and packaging waste going to landfill from economic growth is happening<sup>2</sup>.

### **Key points**

#### **1. EUROPEN agrees to address marine litter at the appropriate high and multi-stakeholder level.**

The PPWD and the Waste Framework Directive (WFD) have been successful in helping divert valuable packaging material from landfills for recycling and recovery. It is hard to see how a quantitative reduction target relating to marine litter, in Europe, could be implemented, enforced and effective given the global nature of the issue and the lack of sound and quality data. The sources and composition of marine litter vary from place to place: in some areas it appears to originate mainly from maritime activities, in others, from tourism (beach litter) or from badly-managed lorry loads or landfill sites. Ocean currents may concentrate litter in certain places. Marine litter is therefore essentially a waste management infrastructure and societal behavioural problem and needs to be addressed at the appropriate high and multi-stakeholder level.

#### **2. Continuous public education to influence behaviour, by authorities and supported by industry**

Littering is a behavioural issue that requires action on many fronts and a holistic approach across the whole range of objects that constitute litter. Encouraging citizens to be more responsible in how they dispose of used packaging, smoking materials, chewing gum, newspapers, and other printed items such as till and ATM receipts and bus and train tickets, as well as bulky items which may be illegally dumped, is partly a matter of education and partly a matter of enforcement.

Educational activities (e.g. for consumer understanding of litter logos) and information campaigns are crucial in order for society to understand the cascade effect of littering and to lead to long-term behavioral change. Industry can and

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<sup>1</sup> EUROPEN -- the European Organization for packaging and the Environment -- is an EU industry association in Brussels presenting the opinion of the packaging supply chain in Europe, without favouring any specific material or system. EUROPEN members are comprised of multinational corporate companies spanning the packaging value chain (raw material producers, converters and brand owners) plus five national packaging organizations all committed to continuously improving the environmental performances of packaged products, in collaboration with their suppliers and customers. [www.europen-packaging.eu](http://www.europen-packaging.eu)

<sup>2</sup> EU data shows there was a 1.9% increase in packaging placed on the market in 2011 compared to 2010 but a 2.7% decline in packaging waste sent for final disposal over the same period. See our dedicated press release: <http://www.europen-packaging.eu/component/news/news/58-packaging-waste-management-is-increasingly-resource-efficient-eu-data-shows.html>

does help tackling marine litter by organizing awareness campaigns and clean-up actions and investing in research to identify where anti-litter measures should focus; but no one action can be effective without the others.

### **Full implementation and enforcement of waste legislation in all Member States**

Since 80% of all marine litter originates from land, full implementation (notably of the PPWD, WFD and landfill Directive) is a pre-requisite, especially in the newer member states, to ensure conditions for effective separate collection of post-consumer packaging in sufficient volume and value. This will help tackle heavy reliance on landfilling and a large number of illegal landfills and/or infrastructure failures, which will in turn contribute to reduce marine litter. EUROOPEN's scope of expertise does not include the other waste streams beyond packaging waste, which constitute litter.

The packaging supply chain cannot accept responsibility/costs (e.g. through Extended Producer Responsibility systems) from other parties over which it has no control, as questioned in the consultation. This includes illegal (packaging) waste dumping on land and beaches. Legislation should not undermine the key role of packaging in product protection, product/food prevention as well as a delivery and communication means to end-users.

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EUROOPEN views on the EU waste legislation review can be found on our website: <http://www.europen-packaging.eu>

Read EUROOPEN's response to the EU waste management targets consultation [here](#)

Read EUROOPEN's position paper on EPR for post-consumer packaging [here](#)

Read EUROOPEN's position paper on the ex-post evaluation of the Packaging & Packaging Waste Directive [here](#)