Position on the EU Commission's Plastics Strategy

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In January 2018, the EU Commission presented *"A European Strategy for Plastics in a Circular Economy"*. The planned measures are intended to reduce waste, strengthen recycling and, in particular, protect the oceans.

Plastic materials have spread worldwide over the past 50 years. They can be applied universally and have a constantly expanding range of uses. Plastics enable cost-efficient solutions. Their outstanding characteristics are near-unlimited formability, low weight, high stability and long-term durability. Broad application and careless handling have developed into an environmental problem. Polymeric and oil-based materials are accumulating on land and in waters. Several hundred years pass before a plastic bottle rots. We are all agreed that there is no room for plastic waste in nature. Such waste must be prevented in the future.

For this reason, the association Masterbatch Verband welcomes the EU initiative and the discussion that was triggered regarding recycling and recovery requirements. However, a general stigmatisation of plastics and plastic articles cannot be accepted.

Keyword "disposable articles": The very aspect of sustainability brings decisions for plastic packaging and not for much heavier glass containers. Goods have to be transported. This means that carbon dioxide is released and valuable drinking water is consumed for cleaning purposes. These arguments should be considered. They point out that flexible solutions are called for.

Masterbatch Verband bets on the circular economy concept

We support the goal to avoid a release of plastic articles into the environment ("littering"), with the following arguments:

- Plastics can be recycled or recovered in manifold ways. This makes them a model case for a circular economy. Already now, the existing technical options would allow a full integration of the plastics value chain into a circular system, even though the capacities needed for this still remain to be built.
- Plastics that cannot or no longer be recycled are energy sources. Thus, they substitute primary sources of energy. Here, the process products – including generated CO_2 – can be recovered. Energy recycling should be reassessed in view of the technically feasible CO_2 regeneration into methane.

How do we get away from disposable plastics?

The approach of looking at the most commonly found objects in the environment is understandable – while it should be differentiated between useful applications of disposable plastics (e.g. medical devices) and disposable articles. Jointly with the stakeholder associations and manufacturers, the Commission should develop requirements for materials in the field of disposable plastics. Well-regulated waste flows are the basis for workable recycling concepts.

An end to articles designed for disposal: Masterbatch Verband speaks for uniform criteria for materials intended for disposable articles, in order to achieve optimal suitability for recycling and recovery. Such criteria should determine the material properties; they must not sweepingly exclude individual materials. Where plastics meet the relevant criteria, their use should be permitted too.

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Consumers: Humans – and not materials! – pollute the environment. The through-away mentality has many causes; one of them is ignorance. Consumer information and education as well as awareness-raising measures should start a rethinking process that might involve sanctions if necessary: because also consumers have responsibilities.

State requirements and incentives: Legislation on the treatment of plastic waste that is implemented in all Member States. Design specifications should be elaborated for the types of use and a return into the material cycle system. At the same time, the raw material industry of the polymer value chain should be encouraged to develop innovative approaches and take them to market maturity, e.g. biodegradable materials.

How can recycling be simplified?

Recycling is an integral process in the circular economy. Various approaches are conceivable to increase the efficiency of recycling in the future:

- The first step should be to regulate short-lived, large-volume products such as beverage bottles, personal care products or food packaging. They must have well-regulated substance flows. The combined cycle of highly pure-grade first use and lower purity requirements in subsequent uses should be put into practice consistently. Energy recovery can form the final stage.
- Waste treatment costs in material recycling are a crucial point. The higher the recycling rates, the lower the consumption of new articles, the lower the price of new articles due to existing production capacities.

As costs and workload for sorting and treatment are considerably lower, energy recycling needs a much simpler infrastructure than material recycling.

Furthermore, specialised incineration plants for plastics would open up the possibility to recover mineral raw materials and metals in plastics. These include precious metals such as cobalt, nickel, chromium and vanadium.

What can we do to prevent that plastics end up where they do not belong?

Deposit systems for plastic packaging should be introduced where they make sense in technical and logistics terms. Concerning plastic articles that are not suitable for deposits, part of the calorific value of the material could be reimbursed in future circular systems. In this way, plastic waste would become a recyclable material with a market value. In a circular economy, household plastic waste would be the fuel for waste incineration plants, electricity power stations or blast furnaces.

Masterbatch Verband was established in 1998. The association represents the interests of German manufacturers of colour and additive masterbatches. It is a sector group of Verband der Mineralfarbenindustrie e. V. (VdMi) and has currently 21 members.

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