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| Description: Consumer Rights 9.png |  |  |
| Association For Consumer Rights (Malta)  c/o Pope Pius XII, Flat 4, Mountbatten Street, Blata l-Bajda  Hamrun HMR 1579, Malta  Tel no 356 21246982, 356 21248881  Email: associationforconsumerrights@gmail.com  Website: www.acrmalta.com |  |

**8.6.2019**

**Contribution of Association for Consumer Rights Malta (ACR) to the**

**ERA Strategy (Malta) for Reducing the impact of certain plastic products on the environment**

**(Directive on Single-use plastics:** [COM(2018) 340 final – 2018/0172(COD)])

***The strategy for Malta needs to be embedded in a comprehensive approach not only by ERA but through a strategy of sharing of all stakeholders through their recommendations and most of all ensuring the contribution of all stakeholders in their specific roles in the effective implementation for the Directive***

**Background Information**

**The proposal for a directive on single-use plastics is a crucial element in the circular economy strategy. The European Union is committed to fighting against this phenomenon in line with the United Nations Sustainable Development Goals[[1]](#footnote-2) and the Paris Agreement (COP 21)**

* **In the European Union, plastic waste accounts for 80-85% of marine waste, of which 50% comes from single-use plastic (SUP) items while another 27% is made up of fishing gear from traditional fishing and aquaculture that contains plastic, lost or abandoned at sea.**
* **The ten SUPs found most frequently on European beaches account for 86% of all the items found and 43% of total marine waste. These are commonly used products which are not always thought of as containing plastic[[2]](#footnote-3): food containers, cups for beverages, cotton buds, plates, straws, sticks for balloons, beverage containers and their lids, tobacco product filters, wet wipes and plastic carrier bags.**
* **These ten products, together with the fishing gear, account for approximately 70% of all marine litter by count[[3]](#footnote-4).**
* **SUPs, which are generally made of polyethylene and polypropylene, require an average of 300 years to degrade in the environment, although in some cases photodegradation may take up to 1000 years. Furthermore, degradation does not mean that the plastic becomes part of the natural cycle of life; rather, the item is transformed into microplastics, becoming invisible to the human eye.**
* **Those SUPs that do not enter the waste management chain accumulate in the seas and oceans with harmful effects on the environment as well as on human health, as they then enter the food chain. In addition, this phenomenon has an impact on several economic sectors such as tourism, fishing and maritime transport.**

**Comments and Recommendations**

* **The transition towards sustainability requires first and foremost the involvement of all political, economic, social, environmental and cultural stakeholders, as well as that of every member of the general public, in a new paradigm of production, consumption and recycling of products.**
* **This is why education, training and awareness-raising campaigns are fundamental at all levels, paying particular attention to young people of school age.**
* **It is important that the list of ten products is expanded and other products should be included for which sustainable alternatives are already available on the market in sufficient quantity and at a reasonable price;**
* **Fishermen can play a crucial part in cleaning the seas and oceans. The incentives for returning fishing gear should be extended as soon as possible to include all the waste collected while fishing.**
* **In order to fully develop a new system for cleaning up seas and oceans, all relevant stakeholders and local authorities should be involved.**
* **In addition, all ports, including smaller ones, should possess an advanced system for the collection and transparent management of waste.**
* **Although 90% of the single-use plastic products present in the European market are produced in third countries, all companies in the sector should receive support in the transition towards more sustainable production.**
* **In particular, innovation and development of sectors such as ecodesign, bioplastics and secondary raw materials must be encouraged through the use of financial and fiscal tools.**
* **In this way, the EU can benefit from significant growth in the trade balance, as well as fostering the development of more sustainable companies and providing more high-quality jobs;**
* **It is also necessary that greater coordination with the rest of the existing legislation on waste management and recycling, as well as focusing on separating rubbish.**
* **Member States should also harmonise authorisations and sanctions.**
* **The strategy for single-use plastic will have a limited effect if the Commission does not intervene with an ad hoc strategy for more sustainable management and monitoring of inland waters (lakes and rivers), through which 80% of the waste in the oceans passes.**
* **The introduction of labelling and traceability systems for plastic products, aimed at informing consumers about waste management with a view to encouraging selective collection and recycling could represent added value with regard to waste management and recycling processes with adequate screening mechanisms to avoid fraud**
* **The creation of a specific logo could strengthen consumer confidence, especially for products manufactured with secondary raw materials;**
* **The proposal introduces specific measures regarding the design of products (e.g. bottle caps) and ambitious aims in terms of recycling (such as recycling 90% of single-use plastic bottles separately**

**Fishing gear containing plastic**

* **The directive proposes an integrated and more modern collection system for fishing gear based on three key points:**
* **the implementation of a specific mechanism and equipment for selective collection in ports,**
* **incentives for fishermen to return fishing gear or bring back gear they find abandoned in the sea, and**
* **the introduction of an extended producer responsibility scheme (EPR) for fishing gear manufacturers, including SMEs.**
* **The funds raised through the EPR scheme will be used to cover the costs of preventing rubbish generation (public awareness campaigns) and for waste management, including the cleaning-up of rubbish made up of single-use plastic products.**

**Responsibilities at National Level**

* **To resolve the issue of the accumulation of plastic waste, both consumer habits and production models are important in addition to waste management.**
* **National governments therefore need to put in place all the necessary tools** 
  + **to encourage the use of sustainable plastic products,**
  + **promoting and supporting the most streamlined production and**
  + **consumption processes.**
* **At the same time, it is important to raise awareness among the general public, from school age upwards, so that they act responsibly and participate in the selective collection of rubbish.**
* **The impact of biodegradable products**
* **The fact that a plastic product is biodegradable does not necessarily mean that it is sustainable from an ecological point of view.**
* **Plastic products, and SUPs in particular, can be transformed into microplastics, contaminating the environment and entering the food chain.**
* **For this reason, governments need to intervene as soon as possible to clarify the principle that all biodegradable plastic products should also be compostable, that is, neither toxic nor harmful to the environment.**

***Grace Attard***

***ACR General Secretary***

1. SDGs Nos 3, 9, 12 and 14 (good health and well-being; industry, innovation and infrastructure; responsible consumption and production; life below water). [↑](#footnote-ref-2)
2. 95% of cigarette filters are made of plastic. <https://www.noordzee.nl/hele-noordzeekust-schoon-2764-vrijwilligers-ruimen-11163-kilo-afval-op/>. [↑](#footnote-ref-3)
3. Beach litter item counts are internationally accepted as a way of measuring the composition of marine litter. The scientific community considers it a very reliable indicator for developing policies. The counting method is based on reports prepared by the Member States and compiled by the JRC as part of the implementation of the Framework Directive on the marine environment (2008/56/EC). Source of data: UNEP, 2017. [↑](#footnote-ref-4)