

Position Paper

A Circular Economy to End Plastic Pollution – Sustainable Production and Consumption

We firmly support the urgent need for a holistic global approach to combat plastics pollution through fostering sustainable consumption and establishing circular plastics economy by 2040. Our position rests on three fundamental principles, each integral to achieving this ambitious goal:

Emphasis on Plastic Circularity and Sustainable Consumption

We strongly advocate for rebalancing the current focus of the zero draft from upstream measures towards plastics circularity and the promotion of sustainable consumption practices. This realignment will effectively create demand drivers promoting sustainable production and consumption, and ultimately leading to an uptake of circular feedstocks and the reduction of our dependency on fossil-based feedstock practices.

Complementing Sustainable Production and Consumption – a Plastic Application-based Approach

Recognising the inherent complexity and diversity of final goods and components fully or partially made of plastics used in different industries and for various purposes, we call for a plastic application-based approach that helps identify problematic and avoidable applications while ensuring exemptions for those problematic application which are of essential use, such as (but not limited to) medical applications and those enabling the energy transition. Instead of pursuing a one-size-fits-all instrument, we advocate for a tiered approach based on harmonised criteria that recognises the specific conditions of the different applications, as well as national and local differences in the availability of infrastructure, geographic and socio-economic conditions.

Targets, Monitoring, and Governance to eliminate plastic pollution.

We unequivocally believe that setting realistic and ambitious targets for circularity considering national capabilities, as well as implementing vigorous monitoring and governance mechanisms are indispensable in our journey towards eliminating plastic pollution. A robust metrics system for assessing plastics pollution is essential for fast-tracking the Global Plastics Instrument. A comprehensive monitoring instrument should guide our collective efforts and provide a tangible yardstick for measuring progress.

Introduction

Plastics Europe supports the objectives of the UN and national governments to end plastic pollution by 2040. We believe that the zero draft misses the opportunity to foster a Circular Economy. The

listed options heavily emphasize the reduction of primary plastics production, while the circular economy approach takes a backseat. We call for an international agreement that incorporates the following 3 essential principles: plastic circularity, an application-based approach, and robust monitoring and governance mechanisms. Our vision aligns with the UNEP report's recommendations¹ for a systematic shift towards reusing, recycling, and diversifying plastic use while also addressing pollution issues.

As countries around the world are facing different realities and needs, we recommend the creation of a set of harmonised criteria that can be used as a tool to identify and determine how to address the diversity of final goods and components fully or partially made of plastics used in different industries and for various purposes (plastic applications)² that are problematic and/or avoidable. This could pave the way for a standardised approach, letting nations evaluate plastic applications in their local markets and take measures at the national and local level, as appropriate.

Towards a holistic and application-based approach to sustainable production and consumption

Plastics Europe supports a holistic approach to stop plastics pollution based on the fundamental principles of circular economy, including sustainable plastic production by reducing the dependency on fossil fuels and consumption³ with waste prevention, reuse, resource efficiency, repair, and repurposing of products and materials. We support the vision of enabling the plastic system transition to a sustainable consumption and production of plastics applications globally. We see tackling plastics pollution on an application level as the most effective lever to reach the objectives of the agreement. Due to strong national differences, we propose the development of a global methodology based on harmonised criteria to determine how to identify and address problematic and avoidable plastics applications on a national level as a fundamental first step. The following criteria could be considered as part of this methodology, amongst others:

- likelihood of plastic pollution contribution of the application during production, use or after use;
- evaluation of risks for human or animal health;
- the capacity to extend shelf life and ensure food and water safety while meeting sector-specific safety requirements;
- environmental and climate benefits of the application;
- socio-economic benefits of the application;

¹ [Turning off the tap](#), UNEP 2023.

² Plastics application are final goods or components fully or partially made of plastics used in different industries and for various purposes. Plastic materials are versatile, and the same material can have a wide range of applications in different industry sectors such as packaging, building & construction, automotive, electrical & electronics, agricultural, gardening & farming as well as household, leisure and sports.

³ We support the definition of sustainable consumption as developed by the United Nations for SDG 12: [Goal 12 | Department of Economic and Social Affairs \(un.org\)](#)

- compliance with minimum chemical safety requirements and good manufacturing practices (as laid out in the internationally recognised regulations such as REACH, GHS, CSA, TSCA, ISO and others);
- capacity to optimise plastic content;
- availability of recycling and waste management infrastructure and/ or feasibility to set up such within a reasonable timeframe;
- potential for behavioural changes;
- potential for redesigning the application in line with a life-cycle assessment including evaluation of the material usage to facilitate sorting of waste and the value of materials at their end of life;
- safe, responsible and environmentally sound end-of-life treatment.

Such a methodological approach should be applicable to products made from all materials and could help to eliminate the production of problematic or avoidable (plastic) products and support the replacement of short-lived or single use applications with durable applications or other alternatives (if reduced environmental impact can be demonstrated) while also considering health and safety information and other socio-economic aspects. This approach will enable us to dedicate our efforts on items with the highest likelihood of leaking into the environment, paving the way for a swift and efficient pathway to effectively combat plastics pollution by 2040 and reach the net zero target by 2050.

Bans of polymers and substances considered as problematic

Focusing solely on specific polymers or substances viewed as problematic without considering the application and potential alternatives will not lead to the desired environmental benefits and risks unintentionally increasing environmental damage and creating other unintended socio-economic impact. The use of the same polymer in diverse applications (e.g., packaging (44% of the global plastic market), building & construction (18% of the global plastic market), or the automotive sector (8% of the global plastic market)⁴) and their management throughout their lifecycle can have also different environmental and socio-economic implications. To address these complexities and minimise unintended environmental damage and socio-economic impacts, a more comprehensive approach is necessary, based on scientific evidence.

Instead of phasing out and/or reducing the supply of, demand for and use of primary plastic polymers foreseen to be listed in Part I and Part II of Annex A (including Options 1 and 2 of Part 1 and 2) of the current zero draft version, we believe a sustainable consumption evaluated on application level and considering local circumstances would be much more efficient for reaching the ambition of the Global Plastics Pollution Agreement.

⁴ [Plastics the Facts, Plastics Europe 2022](#)

Demand Drivers: Adopting Targets for a Circular Production Transition

To enable and drive the transition towards a circular economy, we strongly call for an appropriate regulatory framework at the national and, where possible, global level that should include the following measures:

- **Create demand drivers for the transition to circular plastics production.** This could be achieved via legislative targets for circular plastics based on national and regional circumstances. These targets should be crafted in accordance with national and regional circumstances, ensuring they are both realistic and impactful. By mandating a specific percentage of circular plastics in production, these legislative measures would serve as a powerful incentive for businesses to adopt circular practices in their operations. To complement these targets, governments should also focus on encouraging market investment in circular plastic production. This could be achieved through a range of incentives aimed at companies that commit to incorporating circularity into their manufacturing processes. By doing so, capital flow would be directed towards more sustainable business models, driving innovation in waste management infrastructure, and advancing the transition to circular plastics production.
- **Design for Circularity** is another valuable instrument to boost the sustainable consumption and production of plastic applications in a circular economy. We support the development of common Product Design Principles, based on LCA assessment, to increase among others recycling and where possible reuse. Design criteria, e.g., for Recycling (DfR) criteria, need to be application specific and must aim to support an inclusive transition.
- **Recycled content targets per industry sector.** We consider the setting of recycled plastic content targets as a highly effective measure to support investment in the roll-out of segregated collection and recycling infrastructure. Anchored in national legislations, such targets will help to establish secure legal framework for significant investments needed incl. acceptance of all recycling technologies and establishment of clear performance criteria to be fulfilled by stakeholders.
- **Re-use targets for specific applications.** Addressing the issue of single-use plastics, especially in packaging applications, may include the establishment of re-use targets for collection of waste at the national/local level. These targets should be tailored to the specific characteristics of each product, with a focus on those contributing most to plastic waste. A recent report commissioned by Plastics Europe, *ReShaping Plastics*, highlighted the potential of reuse systems and new delivery models covering different plastic uses and the significant role they play in reducing both emissions and waste from the plastics system⁵.

⁵ [ReShaping Plastics: Pathways to a Circular, Climate Neutral Plastics System in Europe](#), Systemiq 2022

- **Increase the use of circular feedstocks thereby reducing the dependence on fossil feedstocks used for the production of plastics products** A UNEP study evaluating the climate impact of building materials illustrates that large reductions in the carbon impact of plastics are possible through integrated energy, materials, recycling and demand-management strategies to curb life cycle emissions⁶. To achieve sustainable production through feedstock diversification and enable a shift to circular feedstocks, high recycling rates and investments are needed to secure circular feedstock availability, in particular financial incentives to promote essential investments in circularity and support the development of innovative technologies (e.g. innovations in recycling, carbon capture). To safeguard effective plastics pollution prevention, a robust and competitive business case for plastic waste-based feedstock streams is essential to unlock and safeguard constant and significant waste and recycling infrastructure investments at scale. Furthermore, we encourage the establishment of global end-of-waste criteria to enable trade in circular feedstocks and scale up global plastic circularity whilst reducing illegal exports of plastic waste and leakage into the environment.

Socio-economic impacts of production caps

Lowering the global material availability by capping the production of primary plastics or banning certain types of plastics can trigger a series of complex socio-economic and climate repercussions. For example, introducing sudden bans without viable alternatives can lead to shifts towards other materials that might have higher carbon footprints and resource consumption and would not stop pollution of these alternatives. This could counteract efforts to promote responsible consumption and production. A comprehensive analysis⁷ carried out in 2020 of plastics' climate impact across sectors with high consumption, including packaging, building and construction, consumer goods, automotive, and textiles (representing approximately 90 percent of global plastic volume), revealed that, in the majority of cases, plastics had a significantly lower greenhouse gas (GHG) footprint compared to alternative materials (and for packaging, lower than the GHG footprint of the content, in many cases), resulting in potential GHG savings ranging from 10 to 90 percent considering the entire product life cycle and usage impact.

Implementing production caps could potentially restrict the availability of plastics for vital applications like food packaging, medical devices, and renewable energy technologies, where secure and uninterrupted supply chains are essential. Developing nations, especially those reliant on critical products that serve public needs at affordable prices, could be particularly affected by such measures, leading to repercussions on SDG 2, SDG3 and SDG 6. On a global level, packaging, and building & construction applications (the latter accounting for 18% of the plastics applications

⁶ [Building Materials And The Climate: Constructing A New Future](#), UNEP 2023

⁷ [Climate impact of plastics](#), McKinsey 2022.

globally) are the two largest world plastics markets⁸. With building & construction accounting for 23.9% of plastics consumption in Europe, automotive for 9.7% and electrical & electronics for 7.5%⁹, such restrictions may lead to market distortions and trade barriers, raising concerns about supply security within these critical industries.

As plastic products also play a crucial role in the energy transition, including green tech manufacturing (solar, wind, battery tech, insulation)¹⁰, production limits on plastics could disrupt the supply chain for crucial components, slowing down the transition to clean energy and potentially limiting access to renewable technologies, impacting both SDG 7 and SDG 9 goals. In the buildings sector, for example, constrained plastic availability would necessitate resource prioritization for building insulation, window frames, and piping, impacting energy saving targets. In the transport sector, such constraints would also impede the market uptake and scale up of electric and hybrid vehicles, affecting transportation decarbonisation and SDG 9 goals.

Approaches to production caps need to be carefully balanced with the accessibility and affordability of alternatives and the unique circumstances of different countries.

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⁸ [The Circular Economy for Plastics, a European Overview](#). Plastics Europe 2022.

⁹ [Plastics – the Facts 2022](#), Plastics Europe 2022.

¹⁰ [Critical Materials for the Energy Transition](#), IRENA 2021