ACR+

www.acrplus.org

ASSOCIATION
OF CITIES
AND REGIONS
FOR RECYCLING
AND SUSTAINABLE
RESOURCE
MANAGEMENT

ASSOCIATION
DES CITÉS
ET RÉGIONS POUR
LE RECYCLAGE
ET LA GESTION
DURABLE
DES RESSOURCES

ASOCIACIÓN
DE CIUDADES
Y REGIONES PARA
EL RECICLAJE
Y LA GESTIÓN
SOSTENIBLE
DE LOS RECURSOS

GREEN PAPER

ON A EUROPEAN STRATEGY ON PLASTIC WASTE IN THE ENVIRONMENT

ACR+ Position

ACR+ welcomes European Commission's Green Paper and the dialogue that should emerge between the stakeholders involved at different stages of plastic products life cycle, as the problem of end-of-life plastics/plastic waste is growing (e.g. in the case of marine litter).

ACR+ is convinced that:

- an integrated approach is needed in order to deal with all types of plastic waste, which call for a specific plastic policy ("Plastics Roadmap"?), and may imply a dedicated directive and / or a dedicated Extended Producers Responsibility system;

- actions must be taken at European, national and local level in order to boost the waste hierarchy, including the prevention level. Local and regional authorities are key actors in implementing EU waste legislation and ACR+ members fully support to move plastic waste up the waste hierarchy.

Q1: Can plastic be appropriately dealt with in the existing legislative framework for waste management or does the existing legislation need to be adapted?

Considering the specificity of plastics and the need for an integrated approach, ACR+ considers that the existing legislative framework for waste management is not sufficient since it does not cover all plastics, but only specific plastic streams, as in the case of the WEEE Directive, ELV or Packaging Directive.

A global "plastics" policy and maybe legislation is needed, based on the waste hierarchy, diverting as much as possible plastic waste from landfilling and energy recovery, while adopting the life cycle approach, in particular covering prevention aspects (eco-conception), as well as all steps of plastic waste management.

Furthermore, the existing legislation does not sufficiently boost high level of recycling rate, since:

- the 50% recycling target set in article 11 of the WFD is global, without any specification by waste stream;
- the waste packaging recycling rate included in the Packaging Directive is only 22,5%.

Q2: How can measures to promote greater recycling of plastic best be designed so as to ensure positive impacts for enhanced competitiveness and growth?

ACR+ is convinced that a range of measures taken in the EU 28 could lead to greater recycling, at the same time ensuring positive impacts for enhanced competiveness and growth.

The measures could be the following:

- prohibition of certain non-recyclable additives and of multilayer plastics when possible;
- high selective collection rate and recycling rate;
- landfill ban;
- promotion of the use of products containing recycled plastics, especially in public procurement;
- eco-design incentives (eco-labelling).

Most of those measures could be developed through an extended producer responsibility system on plastics.

Effective recycling of mixed plastic waste is a major challenge for the plastics recycling sector. Product design for recycling has a strong potential to assist in such recycling efforts. A study carried out in the UK found that the amount of packaging in a regular shopping basket that, even if collected, cannot be effectively recycled, ranged from 21 to 40%.

Hence, wider implementation of policies to promote the use of environmental design principles by industry could have a large impact on recycling performances, increasing the proportion of packaging that can be economically collected and diverted from landfill. The same logic applies to durable consumer goods designed for disassembly, recycling and specifications for use of recycled resins. Those are key actions to increase recycling.

It is widely known that the effectiveness of post-consumer packaging recycling could be dramatically increased if the diversity of materials were to be rationalised to a subset of the current usage. For example, if rigid plastic containers ranging from bottles, jars to trays were all PET, HDPE and PP, without clear PVC or PS, which are problematic to sort from co-mingled recyclables, then all rigid plastic packaging could be collected and sorted to make recycled resins with minimal cross-contamination.

Q3: Would full and effective implementation of the waste treatment requirements in the existing landfill legislation reduce sufficiently current landfilling of plastic waste?

See question 4.

Q4: What measures would be appropriate and effective to promote plastic re-use and recovery over landfilling? Would a landfill ban for plastic be a proportionate solution or would an increase of landfill taxes and the introduction of diversion targets be sufficient?

A rigorous application of the waste hierarchy should be applied via financial tools, in order to ensure that reusable and recyclable materials are not burnt, and that flammable materials are not landfilled. Additional efforts or elements in the existing legislation are likely to be needed. Further discouraging of the landfill of plastics can be achieved by new financial instruments, i.e. taxes on landfilling and on waste combustion in order to give incentive to material recycling.

A zerowaste landfill principle and thus a landfill ban for plastic are definitely an efficient measure. Support for countries which currently still heavily depend on landfilling and which do not have WtE facilities should be considered, in order to move from landfilling directly to the “3R” principle. EPR schemes, bans, taxes, high recycling objectives and recycling infrastructure should be studied and the most appropriate options/combinations chosen.

Experience shows that there is considerable scope for re-use of plastics used for the transport of goods, and for potential re-use or re-manufacture for some plastic components in high-value consumer goods, such as vehicles and electronic equipment. This is evident on an industrial scale with re-use of containers and pallets in haulage. A shift away from single-use plastic carrier bags to reusable bags has also been observed, both because of voluntary behaviour change programmes, and as a consequence of legislation, such as the plastic bag levy in Ireland.

Moreover, refillables for personal hygiene products (shampoo, shower gel, etc.) and cleaning products (detergents, etc.) should become standard practice. Refill can be done through direct refill at the shop or by buying a refill pack (flexible pouch, sachet, etc.). As an intermediate step by 2020, a 50% target of soaps sold in bottles with dispensing pumps be replaced by refill systems (plastic bags/pouches), and 50% of bottles with dispensing pumps/triggers be replaced by refill systems (plastic bags/pouches) could be suggested. The proposed measure would reduce the production of the amount of HDPE primary packs with plastic dispensing pumps/triggers by switching towards larger refill bags/pouches (avoided raw materials costs).

Q5: What further measures might be appropriate to move plastic waste recovery higher up the waste hierarchy thereby decreasing energy recovery in favour of mechanical recycling? Would a tax for energy recovery be a useful measure?

ACR+ supports any measure helping to move plastic waste up the hierarchy, giving priority to mechanical recycling before energy recovery. A tax for energy recovery could be a useful measure if combined with other economic instruments, such as recycling targets, EPR schemes, etc.

Q6: Should separate door step collection of all plastic waste combined with pay-as-you-throw schemes for residual waste be promoted in Europe or even be made mandatory?

Rigorous application of separate collection obligations would lead to more recycling. Separate door step collection of plastic waste should be made mandatory for different types of plastic waste (not only packaging), for fractions that can be recycled technologically, at the European level (European obligation). Pay-as-you-throw principle could also be promoted at EU level both for residual waste and recyclable waste to make the citizens aware of their consumption and waste production, and to incite to more prevention, reuse and better sorting. PAYT schemes lead to expenditures for local and regional authorities, which need to be included in the waste treatment prices.

Q7: Are specific plastic waste recycling targets necessary in order to increase plastic waste recycling? What other type of measures could be introduced?

High recycling rate targets for specific plastic waste are essential in order to increase recycling, and not only on packaging waste as it is currently the case. MBT, closed-loop recycling and down-cycling, mechanical and feedstock recycling could also be more accurately defined, so that clear priorities with distinct objectives can be set (i.e.: to recycling vs. down-cycling).

In the current legislation plastic recycling targets are only mentioned in the Packaging Directive and are significantly low. More targets could be defined in a separate plastics regulation, or explicitly defined in other waste regulations, in order to increase collection, separation and recycling of plastic waste.

Nowadays, too many plastics disappear from the recycling chain because incentives are not strong enough for recycling in particular due to funding and investments that are not respecting the waste hierarchy. Therefore, it should be ensured that European funding and investment framework fully comply with this hierarchy.

Moreover, a market for recycled plastics must be supported through instruments like GPP and/or eco-design and/or eco-label criteria on recycled content. Herein such case, however, the risk exists to create infrastructures/systems which would permanently need sufficient waste input to be economically viable, which can, in turn, be a contradiction with waste prevention/reduction objectives (cf. the incinerators which need a minimal quantity of plastics - or other energetic wastes - in order to be operational). This is why it is important to adopt a combination of measures in the framework of an integrated approach: obligatory

recycling targets in order to obtain a continuous flow of recycling, even in poor economic conditions, combined with a complete, non-restrictive, prohibition of landfilling, and an obligation of separate collection.

Q8: Is it necessary to introduce measures to avoid substandard recycling or dumping of recyclable plastic waste exported to third countries?

The main goal should be to recycle plastic waste as much as possible in European markets, in order to stimulate local recycling markets and prevent waste recycling under uncertain conditions in developing countries (cf. debates on a resource efficient Europe). However, “green-listed plastics” could be freely exported to developing countries. The conditions in which these plastics are treated cannot be controlled by the European Member States, even with the developed enforcement policies used in the exporting countries. Quality assurance labels, as far as possible, might be one possible solution to tackle this problem. Another solution might be to put the “enforcement issue” more on the European priority agenda.

Q9: Would further voluntary action, in particular by producers and retailers, be a suitable and effective instrument for achieving better resource use in the life cycle of plastic products?

Voluntary actions are to be supported as a first approach and allow testing before legislation takes over. However, other (more legally-binding) instruments should be preferred such as detailed ((waste-) specific) rules/targets in the Eco-design Directive, Extended Producer Responsibility, etc.

Currently, producers and retailers undertake various voluntary actions. Those actions are not necessarily inspired by environmental motives, but rather by economic motives. The achievements, such as weight reduction of plastic packaging per unit, have reached a critical point. Economics dictate that most producers use close to minimum of the required material necessary for the given application. The light-weight plastic packaging is made possible through more complex packaging materials (multilayers, additives), rendering the recycling of the packaging more difficult. The lack of clear ER (Environmental Requirements), too vague CEN standards (EN13427-13432) and (F)LCA (Fast Life Cycle Analysis) must be addressed. Producers should ensure and declare that the packaging placed on the market complies with the Essential Requirements (minimisation of weight and volume, minimization of hazardous substances, and packaging reuse and recovery). The self-assessment has to be made available in a file comprised of a written declaration of conformity and technical documentation. Besides, an EU toolkit for Essential Requirements could be elaborated.

The Retail Forum could become “the” place to harmonise concrete measures regarding 3’R’ actions in the field of plastic waste by the retail sector. The UK Courtauld agreement could serve as inspiration. Moreover, a benchmark of concrete results (preferably quantified) in the field of 3’R’ actions among large retailers in Europe should be set up by an independent body, in order to make consumers aware of the developments and achievements in the field of 3’R’ actions undertaken by each retailer. The retail sector plays an important role as intermediary between the producers and consumers, and as such has a strategic position in proposing specific requirements regarding product design.

Q10: Is there scope to develop deposit and return or lease systems for specific categories of plastic products? If so, how could negative impacts on competition be avoided?

Deposit and return systems, as well as other systems, have proved successful. They can either be designed for further reuse or to achieve a high collection of waste for recycling.

The administrative costs born in order to manage and maintain the deposit and return systems are one of the disadvantages of such systems. The introduction of those systems must be evaluated case by case. Competition should be assured, the right goals should be defined, and they should be closely monitored and enforced. In certain cases ”leasing systems” for certain plastics such as agricultural films and mattresses, tires (equal with high environmental impact) could be considered.

A deposit scheme for refillable PET bottles (up to 15 times), already in place in some countries but on a limited scale, could be further investigated. To this end, a stakeholder consultation platform of producers/retailers/research institutes/ consumer organisations/authorities, etc. ought to be set up and provide guidance in the extension of this system, should it have positive environmental effects. Return systems are to be envisaged in countries where the selective collection of plastics (door-to-door collection or recycling parks) is in its infant stage or inexistent. Return systems, often organised by the retail sector, could be important for rural areas where no selective collection or bring system is in place or economically feasible. Lease systems should be considered only for durable plastic materials with high environmental impact at the end of life.

Q11: What type of information would you consider necessary to empower consumers to make a direct contribution to resource efficiency when choosing a plastic product?

Consumers should be empowered, assisted and encouraged (using the 4’E’ principle: enable, encourage, engage and exemplify) to make sustainable and healthy choices, which will lead to savings for themselves and for society as a whole. Empowered consumers who can rely on a robust framework ensuring safety, information, education, rights, means of redress and enforcement, can actively participate in the market and make it work for them by exercising their power of choice and by having their rights properly enforced.

Consumers have the right to know the environmental impacts throughout the lifecycle of the products (goods and services) they intend to buy. Effective tools are needed to protect them against misleading and unfounded environmental and health claims. In today’s fast-changing world, consumers are often bombarded with information, but they do not necessarily always have the information they need. Faced with increasingly complex information and choices, consumers more and more often rely on labels or turn to intermediaries and filters, such as comparison websites. There is cause for some concern as to their reliability and accuracy, however. Consumer organisations play an essential role in improving consumer information and knowledge, but their situation varies enormously between Member States. Those operating at national level, in particular, often lack resources and expertise, and their role in channeling and filtering consumer concerns is not always properly recognized. The following key-issues have to be addressed: improving consumer safety, enhancing their knowledge and enforcing consumers’ rights.

Q12: Which changes to the chemical design of plastics could improve their recyclability?

Additives, inks, glues and other catalysts in plastic materials should be closely monitored and limited for the purpose of optimized recyclability. Avoid multilayer plastics for the sake of light weight gains. In theory, it is possible to closed-loop recycle most thermoplastics, however, plastic packaging frequently uses a wide variety of different polymers and other materials such as metals, paper, pigments, inks and adhesives which increase the difficulty.

Closed-loop recycling is most practical when the polymer constituent can be effectively separated from the sources of contamination and stabilized against degradation during reprocessing and subsequent use. Ideally, the plastic waste stream for reprocessing would also consist of a narrow range of polymer grades to reduce the difficulty of replacing virgin resin directly. For example, all PET bottles are made from similar grades of PET suitable for both the bottle manufacturing process and reprocessing to polyester fibre, while HDPE used for blow moulding bottles is less-suited to injection moulding applications. As a result, the only parts of the post-consumer plastic waste stream that have routinely been recycled in a strictly closed-loop fashion are clear PET bottles, and, recently in the UK, HDPE milk bottles.

Pre-consumer plastic waste such as industrial packaging is currently recycled to a greater extent than post-consumer packaging, as it is relatively pure and available from a smaller number of sources of relatively higher volume. The volumes of post-consumer waste are, however, up to five times larger than those generated in commerce and industry, and so in order to achieve high overall recycling rates, post-consumer as well as post-industrial waste needs to be collected and recycled. The 6 EN standards do not give companies precise instructions on how to optimize packaging. A toolbox could provide support producers in order to comply with the European Packaging and Packaging Waste Directive (EU/94/62), the 6 harmonised CEN standards (EN13427-13432), and to assist national/regional authorities in the implementation and auditing of the Directive and Standards.

Q13: How could information on the chemical content of plastics be made available to all actors in the waste recycling chain?

One of the “Essential Requirements” of Directive 94/62/EC stipulates that packaging be designed, produced and commercialized in such a way as to permit its reuse or recovery, including recycling. Recyclability guides and (web)tools should encourage designers to consider recycling possibilities, provide guidelines for those wishing to make their packaging / plastic products (more) recyclable and provide everyone with information on how to prevent their product from inadvertently with existing plastic recycling streams. The “Design for recycling guidelines – PET bottles” prepared by the EFBP (European PET bottle Platform) could serve as example.

Q14: How can challenges arising from the use of micro plastics in products or industrial processes and of nano-particles in plastics be best addressed?

It has been shown that micro-beads are in the effluent of water treatment installations. From there, they can reach the marine environment. Micro-plastics are present in all the seas and oceans of the world. Micro-plastics can also enter living organisms e.g. fish,

lobsters, bivalves, oysters, sea cucumbers or zooplankton, and thereby enter the food chain. Eventually, this could also affect human health.

Micro-plastics in products such as facial cleaners and toothpaste are a relatively new source of pollution. Millions of people, unaware of the potential consequences, use these products on a daily basis and wash the plastic beads down the drain. Three out of four scrubs and peelings contain micro-plastics. Shampoos, soap, toothpaste, eyeliners, lip gloss, deodorant and sunblock sticks may also contain plastic particles. It is essential that producers of such products return to using organic degradable particles. The ban of micro-plastics could be envisaged.

The second stream are the nano-particles whose use is increasing slowly but steadily. Nano-bio and e-technologies will create a whole spectrum of new artificial materials. Major breakthroughs within the next two decades will provide inexpensive ways to produce mass quantities of those materials. In addition, the function of such materials will move from ”passive” to ”active” with the integration of nano-scale valves, switches, pumps, motors and other components. Obviously, the willingness to throw them away will increase as they become less and less expensive. The environmental impacts thereof are not yet known and so thorough research could be conducted.

Q15: Should product design policy tackle planned obsolescence of plastic products and aim at enhancing re-use and modular design in order to minimize plastic waste?

If planned obsolescence is an issue in, we assume, more durable plastic products then definitely it has to be addressed. Most of the packaging other than bottles are soiled, often complex (different materials in the same packaging), with variable compositions (several plastics options for the same type of packaging) and available in low quantities.

See answer to question 16 regarding enhancing re-use and modular design.

Q16: Could new rules on eco-design be of help in achieving increased reusability and durability of plastic products?

The revision of the Eco-design Directive should broaden the scope (larger than energy criteria only) and include criteria for reusability, durability, reparability and modular construction, in line with what was proposed in the WFD. The principles should include design for reuse, design for repair and design for recyclability, depending on the plastics/products made. Durability is less of an issue for single-use plastic packaging waste (short life time), but it is to be considered in the case of WEEE, toys, vehicles, construction materials, etc. Similarly and in line with the above, the Eco-label Directive should be evaluated and, if needed, adapted including the criteria for reuse/repair/recyclability.

Q17: Should market based instruments be introduced in order to more accurately reflect environmental costs from plastic production to final disposal?

ACR+ would welcome that the Commission explore the possibilities for introducing market-based instruments, addressing environmental costs from plastic production to final disposal, as well as from other raw material production.

Q18: How can the waste burden posed by short-lived and single-use disposal plastic products best be addressed?

There is a wide range of policy options put in place to address the negative impacts of the widespread use of single-use plastic bags. The amount of plastic carrier bags could drastically be reduced by implementing the right mix of policy instruments such as: education and information instruments (e.g. public campaigns), economic instruments (e.g. charges, taxes) and voluntary approaches, command and control instruments (e.g. prohibition bans), as well as management and planning.

Extended Producer Responsibility could be the best option to transfer the cost for handling this type of plastic waste from the environmental and the waste handling phase to the production phase, and, thereby, from the environment and waste handlers to the producers. Producers should be financially responsible for the waste they produce, including waste properly disposed of or handled, as well as litter costs (especially marine litter).

Q19: What are the applications for which biodegradable plastics deserve to be promoted, what framework conditions should apply? (see also 20)

This is a problem of terminology, poorly understood by consumers and other actors.

Biodegradable plastics have the potential to solve a number of waste-management issues, especially for disposable packaging that cannot be easily separated from organic waste in catering or from agricultural applications. However, biodegradable plastics also have the potential to complicate waste management when introduced without appropriate technical attributes, handling systems and consumer education.

The framework conditions to be applied:

- Disintegrate rapidly during the composting process (so that no large plastic fragments will wind up on the composters' screens when the process is finished).
- Biodegrade quickly under the composting conditions.
- Not reduce the value or utility of the finished compost. The humus manufactured during the composting process will support plant life.
- Not contain high amounts of regulated metals.

A transparent debate with all stakeholders on the proliferation and (ab-)use of biodegradability claims is needed ; the issue of biodegradable plastics and bio-plastics needs much further investigation in order to secure resource conservation, to inform consumer correctly and to ensure proper waste management.

Q20: Would it be appropriate to reinforce existing legal requirements by making a clear distinction between naturally compostable and technically biodegradable plastics, and should such a distinction be subject to mandatory information?

Yes, definitely, a distinction should be subject to mandatory information. To be considered biodegradable, the decomposition has to be measured by standardized tests, and take place within a specified time period, which varies according to the "disposal" method chosen. The current EN standards for biodegradability should be reinforced by considering additional biodegradability standard test methods for soil, for marine and fresh water, for wastewater treatment facilities, and for anaerobic digestion. Belgium is unique in offering "The OK Compost HOME" mark, which guarantees that the product can be composted in home composting systems.

Q21: Would the use of oxo-degradable plastic require any kind of intervention with a view to safeguarding recycling processes, and if so, on which level?

Oxo-degradable plastics do not meet any standards for biodegradability currently in place, and should not be considered biodegradable. The term "oxo-biodegradable" suggests that the product may undergo biodegradation. However, the main effect of oxidation will be fragmentation of the material into small particles, which remain in the environment. Therefore, the term "oxo-fragmentation" may better describe the typical degradation process of the plastic. oxo-plastics have the potential to do the recycling processes more harm than good. Some of the major international retailers like Tesco and Co-op have stopped using oxo-plastics altogether. A ban on oxo-plastics could be a solution.

Q22: How should bio-based plastics be considered in relation to plastic waste management and resource conservation? Should the use of bio based plastics be promoted?

Bio-based plastics can replace many harmful conventional plastics, can be fully biodegradable (capable of being utilized by living matter), can be made from a variety of renewable resources and can be composted locally into a soil amendment. Even though bio-based plastics have many benefits over petro-plastics, several challenges also lie ahead and should be considered:

- Concern over genetically modified organisms (GMOs)
- Desire for sustainably grown biomass (competition with food production being an issue)
- Need to develop composting programmes and infrastructure
- Lack of adequate labelling
- Concern over contamination of recycling systems
- The lack of an agreement on the meaning of "bio-based" can lead to misunderstandings and even greenwashing accusations.

Bio-based plastics must be developed with clear sustainability goals and guideposts to avoid pitfalls. Additionally, the current excessive consumption of materials and products will overburden the Earth's capacity, whether the materials are fossil-fuel-based or bio-based in origin. Reduced consumption, more efficient product design and applications, as well as shifts from disposables to reusables are the way to go.

Q23: What actions other than those described in this Green Paper could be envisaged to reduce marine litter? Should some marine litter related actions be coordinated at EU level (e.g. by setting up a coordinated European Coastal Clean-up Day to raise awareness)?

- Harmonise and better enforce waste and resource legislation between Southern and Eastern Mediterranean countries in line with the EU legislation
- Engage at the municipal level in "Integrated Sustainable Waste & Resource Management (ISWRM)"
- Consider the waste hierarchy at all times when identifying, formulating and implementing concrete actions
- Improve data on quantities, flows and handlers of plastics for planning purposes
- Work with the scientific community and researchers to better understand and evaluate the scope, origins,impact and solutions
- Promote a combination of comprehensive policy and economic instrument options to prevent plastic litter
- Consider flexibility to tailor policies to the local context
- Promote public-private partnerships to create value out of plastic waste streams
- Increase technical skills, means and expertise at local, regional and national level in order to better focus and prioritise actions
- Improve coordination among the various institutions and levels of authorities per country
- Engage in proper communication, transparency and coordinated action with the production and retail sector
- Raise awareness on plastics by cooperating with all stakeholders and engage in public and private partnerships
- Support beach clean-ups and educational programmes
- Engage in fishing for litter initiatives
- Provide a basis for monitoring progress and assessing the success or failure of specific measures undertaken
- Support the European Week for Waste Reduction by asking all Member States to take part in this EU-wide initiative

Q24: In its proposal for a new Environment Action Programme the Commission suggests that an EU wide quantitative reduction target for marine litter be established. How can the setting of such a target provide added value to measures that reduce plastic waste generally? How could such a target be developed?

80 to 85% of marine litter originates upstream. Compliance with the EU Waste Framework Directive (50% recycling), more stringent plastic packaging waste recycling targets (56% recycling - as currently achieved by one EU Member State) is the way to go. This will automatically lead to less plastic waste in the seas. A specific reduction target for marine litter can only be considered if correct data on current marine litter are available, which is not the case for the time being. Therefore, increased monitoring and data collection should be considered.

Q25: Should the EU attach a higher priority to plastic waste in the framework of its "New Neighbourhood Policy", particularly in order to reduce plastic littering in the Mediterranean and in the Black Seas?

The answer is obviously yes. The prospects of future developments in the Mediterranean basin (Northern and Southern shore) will have a great impact on the environment. The

coastal cities will grow, the number of tourists and linear coastal developments will increase, and consequently resource use and waste generation will increase as well.

The EU WFD with its targets, as well as the Packaging Directive will influence the process and, hopefully, drastically reduce plastic littering from sources along the Northern shore. But what about the Southern shore? Since only the Northern shore countries have such legislation and targets in place, the whole effort might be watered down if the Southern shore countries do not apply similar legislation, economic instruments, and 3'R' principles.

Currently, the Southern Mediterranean countries focus mainly on moving from uncontrolled landfilling to controlled and sanitary landfilling. If we want to see durable change for the whole of the Mediterranean basin, new legislation should be adopted, together with the introduction of economic instruments and ambitious targets.

The institutional capacity at all levels (national, regional and local) should be enhanced including ways to organise awareness and clean-up campaigns. Investments in recycling infrastructure will only follow if all this is in place. The guarantee should be given that legislation will be properly enforced and targets adequately monitored.

Therefore, ACR+ believes there should be more coherence between the different EU directorates in order to use its resources regarding the "New Neighbourhood Policy" more appropriately.

Q26: How could the EU promote more effectively international action to improve plastic waste management worldwide?

ACR+ believes that EU authorities should endorse and support sustainable initiatives which have demonstrated clear improvements in waste management. Best practices in waste management should be shared not only at EU level, but also on a global scale, and consequently not only at national level, but also at local level.

ACR+, as an international network of local and regional authorities, active in Europe and in the Mediterranean, is ready to offer its expertise and wide range of contacts towards the consultation process, in order to assist the European Commission in the development of its plastic waste management strategy and propose the right way forward to enhance integrated, sustainable management of plastics waste in Europe and the Mediterranean.