

Position Paper

UEAPME¹ position on the Proposal for a Directive on Packaging and Packaging Waste to reduce the consumption of lightweight plastic carrier bags

UEAPME represents SMEs producing lightweight plastic bags being targeted by the Proposal for a Directive amending Directive 94/62/EC on Packaging and Packaging Waste (hereinafter the Proposal) in countries such as Italy, Finland and Croatia where this is an important manufacturing sector. At the same time, UEAPME represents SMEs retailers supplying such bags to their customers at the point of sale.

First of all, UEAPME agrees with the general objective of the Proposal to limit negative impacts on the environment, in particular in terms of littering, as well as to encourage waste prevention and a more efficient use of resources. However, it is important to consider the fact that further reductions on the use of plastic bags can be detrimental for the competitiveness of the EU as they will jeopardise an **important EU manufacturing sector**, reducing work places and leading to the closure of EU companies, the majority of which are SMEs².

Moreover, the reduction could entail the shift into substitutes such as paper carrier bags, whose environmental footprint has not been analysed and could turn out to be high. Therefore, it would be advisable to have the results of these studies before proceeding further.

As a consequence of the above said, UEAPME does not support the introduction of an EU-wide reduction target on the consumption of lightweight plastic carrier bags imposing a quick phase out of such bags. Instead, UEAPME recommends the EU institutions **to make sure that the Member States install the competent waste management systems**. The environmental problems associated with plastic bags would be solved through proper collection and disposal systems of high ecological standards as it is for example the case in Austria. Likewise, the launch of **EU-wide awareness-raising campaigns** among all actors of the society to further prevent the disposal and littering of such bags as well as to encourage their reuse would also achieve the desired environmental goal.

Secondly, as it stands now the Proposal treats in the same way all Member States irrespective of their levels of consumption of plastic bags. For this reason, UEAPME asks **that the low consumption levels of plastic bags and measures in place in some Member States will be taken into account** during the transposition of this directive so as to ensure that Member States that have already reached the reduction objectives of the current Proposal are not confronted with additional obligations.

¹ UEAPME subscribes to the European Commission's Register of Interest Representatives and to the related code of conduct as requested by the European Transparency Initiative. Our ID number is [55820581197-35](#).

² The total Community production of plastic sacks and bags containing at least 20% of polyethylene by weight and of thickness not exceeding 100 micrometers is of 1 175 000 tonnes and involves 12 000 jobs which are mainly in small and medium sized companies according to Council Regulation (EC) No 1425/2006 of 25 September 2006.

Thirdly, UEAPME is of the opinion that bags made of a **minimum of 40% of renewable raw materials as well as the bags produced from recycled plastic materials** have to be exempted from the scope of this directive.

Last but not least, in terms of the timing of the present Proposal, UEAPME believes the European Commission should not amend the Packaging and Packaging Waste Directive at the moment and separately from the review of EU waste policy and legislation foreseen for mid-2014. Ensuring the consistency of EU waste legislation is one of the objectives of the waste review and it will not be possible if amendments of important waste laws such as the Packaging and Packaging waste Directive take place outside the overall waste review.

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