

BY THE DUTCH PROVINCES

# POSITION PAPER

Circular Packaging  
& Plastics



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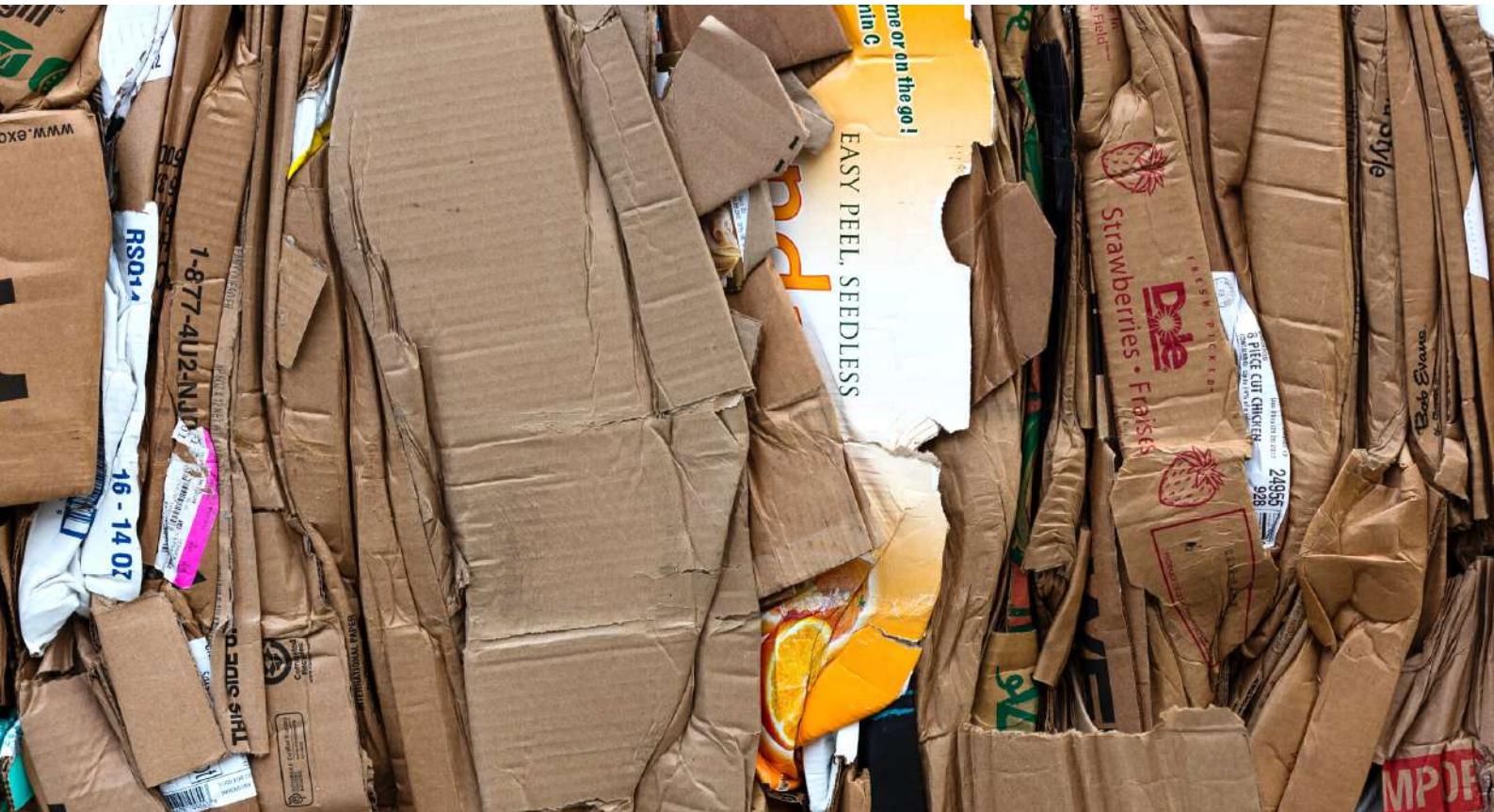
# INTRODUCTION

This paper focuses on two 'key product value chains' that pose serious challenges to the circular transition in Europe: '**packaging**' and '**plastics**'.

The Netherlands recognizes these challenges in their **national Circular Strategy** in which one of the five transition themes is Plastics. Both the national government and the Dutch provinces are committed to ensure that by 2050 the regional economies are fully circular. A main challenge our national government sees is the creation of an EU level playing field for circular products and circular plastics.

The provinces call on the European Commission to address the following issues in the Review of the packaging and packaging waste directive; the Policy framework for bio-based, biodegradable and compostable plastics and/or the measures designed to reduce the release of microplastics in the environment.





## REVIEW OF THE PACKAGING AND PACKAGING WASTE DIRECTIVE

The biggest international challenge for provinces regarding packaging is that circular strategies are more expensive than linear strategies. This is due to the lack of an international level playing field. In addition, the different approaches towards plastics use and processing systems in Member States obstruct a circular transition.

# REVIEW OF THE PACKAGING AND PACKAGING WASTE DIRECTIVE

Therefore, the Dutch provinces:

- Ask the European Commission to create a **European level playing field** in order to ensure the right conditions for businesses to make the shift towards circular production and circular use of plastics. There is a need for financial and legislative support of substitutes to create an economically competitive position. We therefore encourage taxing the use of virgin fossil-based plastics.
- Ask for a European minimum content of recycled plastics and biobased materials in packaging materials, differentiated by product type. We encourage the EC to also count circular feedstock materials resulting from chemical recycling of waste as recycled content.
- Ask the European Commission to pay attention to the use of the definition of 'waste' as it is presented in the current Waste Framework Directive. The unclear definition of 'disposal' causes obstacles for companies that want to use secondary resources. This legal inequality on European and national scales obstructs the use of (bio)waste as a secondary resource.
- Ask the European Commission to facilitate a European single market for the trade and transportation of waste streams to facilitate a true circular society.



# REVIEW OF THE PACKAGING AND PACKAGING WASTE DIRECTIVE

- Ask the European Commission to stimulate **innovative recycling techniques, with a preference for low-energy techniques**, such as chemical recycling, that process plastics into high-quality circular materials and base chemicals.
- Ask the European Commission to discourage the production of fuels from plastic waste if this waste can also be recycled.
- Support the European Commission to **reduce the complexity of packaging materials**, including the number of materials and polymers used such as in the horticulture sector. The provinces suggest to use obligatory markers to facilitate easy identification and sorting of waste.
- Support the European Commission to stimulate design for re-use and recyclability of packaging and products.
- Support the European Commission to align the packaging and packaging waste directive with the Zero Pollution Action Plan, including POPs and REACH Regulations.



# POLICY FRAMEWORK FOR BIO-BASED, BIO-DEGRADABLE AND COMPOSTABLE PLASTICS

The Dutch provinces recognize two main challenges when it comes to bio-based, bio-degradable and compostable plastics.

Firstly, the terminology is often not used in the right way. This leads to for example the misuse of bio-degradable plastics, leading to unintentional pollution. Secondly, a lack of European standardized labels makes it more difficult for entrepreneurs to contribute to the circular transition. Currently, Member States have different labeling, leading to higher costs for companies.



# POLICY FRAMEWORK FOR BIO-BASED, BIO-DEGRADABLE AND COMPOSTABLE PLASTICS

Therefore, the Dutch provinces:

- Support the European Commission to label products as 'biodegradable' or 'compostable' only when it does not mislead consumers to dispose it in a way that causes plastic littering or pollution due to unsuitable environmental conditions or insufficient time for degradation.
- Recognize that biological degradation is a low-grade circular strategy, because materials do not remain in the plastic cycle. Therefore we encourage to only choose this strategy for specific product groups, where refuse-, rethink-, reuse- or recycle strategies are insufficient or where the application of biodegradable plastics actually prevents micro-plastics or contamination of compost.
- Ask the European Commission to apply similar rules and regulations for the use of biobased plastics as for fossil-based plastics. Although biobased plastics have a lower environmental impact than fossil-based plastics, the environmental impact is still significant.
- Encourage the European standardization of labelling and information for treatment after usage of bio-based, bio-degradable and compostable plastics.







## MICROPLASTICS

The Dutch provinces recognize the need to reduce the amount of microplastics released in the environment.

Therefore, the Dutch provinces:

- Ask the European Commission to provide clear guidelines on how to incorporate microplastic pollution data in the environmental impact assessment (LCA) or other impact related communication forms.
- Encourage a European ban on unnecessarily added microplastics to cosmetics, toothpaste and detergent.
- Ask the European Commission to stimulate consumer's behavior and systems that help prevent underinflated tires. For example by adjusting the Tire Pressure Monitoring System (TPMS) to a lower percentage than the current 20% or by stimulating the installation of real time smart TPMS systems in roads. Ask the Commission to stimulate tires that are less prone to wear and tear and are more silent, or set requirements for tire wear and noise emissions.

# REGIONAL IMPLICATIONS OF CIRCULAR POLICIES ON PLASTICS IN THE DUTCH PROVINCES

## Zuid-Holland

'Accelerating Together' is the regional translation of the Dutch national Circular Strategy. Zuid-Holland focuses on 'refuse, rethink and reuse' of plastics and on enhancing recycling strategies. The horticulture and chemical sectors play a major role in the circular transition. The chemical industry as the producer of plastics and the horticulture cluster as a field in which one works towards circular packaging chains.

## Noord-Holland

The province of Noord-Holland knows several circular plastics initiatives such as 'FastFeedGrinded', 'Plastic Recycling Amsterdam', and the 'Circular Plastic Alliance'. The Circular Plastics is an initiative of Circular Plastics and its partners. This Alliance focuses on designing and producing sustainable plastic innovations within closed loops within the horticulture sector, the construction industry and air cargo firms.



# REGIONAL IMPLICATIONS OF CIRCULAR POLICIES ON PLASTICS IN THE DUTCH PROVINCES

## Northern Netherlands

In the Northern Netherlands, we are excellent within the transition to a circular economy, based on the triple helix approach in which we work together with governments, knowledge institutions and companies. There are a multitude of initiatives concerning the recycling of plastics in the Northern Netherlands. One of these programs is 'Chemport Circular Plastics'. This is an initiative to develop our region into the main circular plastics cluster of Europe, a Circular Hub. The focus lies on closing the polymer cycle. This is supported by in-depth expertise on polymer synthesis and production, recycling, re-use, and marketing & sales.

At various locations in the Northern Netherlands, companies are working to recover polymers from household waste, and recycle them via thermal, mechanical and chemical recycling. With the National Test Centre for Circular Plastics (NTCP) in Heerenveen, the Northern Netherlands is putting itself on the R&D map. The NTCP is a not-for-profit organization and the first independent test center in Europe. In this facility we conduct independent tests, challenging experiments, pragmatic and data driven advice and research in order to contribute to closing the plastics cycle. Noordelijk Innovatielab Circulaire Economie (NICE) works on issues in the field of Circular Economy with governments, companies, knowledge institutions and citizens, bringing innovation also for the plastics sector. In addition to that with Association Circular Friesland we work with our communities in closing the circular loop to foster a true circular society. The opportunities for both science, business and our community are tremendous. **Thus, with a number of organisations, the Northern Netherlands has set an ambition to become the expert Ecosystem for Circular Plastics in Europe, making it a true European Circular Hub.**



# REGIONAL IMPLICATIONS OF CIRCULAR POLICIES ON PLASTICS IN THE DUTCH PROVINCES

## Limburg

**In the Limburg region we are developing Europe's first large-scale Circular Hub.** A broad alliance of parties (Chemelot Circular Hub) around the Dutch chemistry and materials cluster Chemelot is developing a world that is free from waste. Many of the organizations based at Chemelot and Brightlands Chemelot Campus are global leaders in their specific field. Together with knowledge and educational institutes and government bodies they all advocate an integrated, future-proof investment in its core quality: making chemistry, materials, the economy and society circular. There are many developments and initiatives on circular plastics in the Limburg region.

For instance, at the national level, Brightlands Circular Space is recognized as an important project, within **Circular Plastics NL. Brightlands Circular Space** investments are being made in a facility designed to accelerate the scaling-up of design, up to and including recycling activities. As a whole, the programs forms the foundation for an efficient and inclusive ecosystem for circular plastics. This will also include an incubator for the development of innovative disruptive technology for the next generation of circular plastics.

