

PRO EUROPE response to EUPR press release ‘Increasing Plastics Waste Exported to Far East’

PRO EUROPE represents 32 national schemes responsible for the collection, recovery and recycling of packaging waste active in 26 Member States, 2 candidate countries, Norway, Iceland, Ukraine and Canada.¹

PRO EUROPE’s member organisations contribute to meeting the recovery and recycling targets laid down in EU Directive 2004/12/EC on Packaging and Packaging Waste. As practitioners who are closely involved in the collection and recycling of packaging waste, PRO EUROPE has collaborated widely with the European institutions in shaping the revised Packaging Directive by sharing experience and expertise.

Summary

On 24 August, the EUPR (European Plastic Recyclers) issued a press release which outlines the increase of plastic waste exported to the Far East. In particular, they state that some of the European collection systems are directly or indirectly supporting plastics waste exports to the Far East and question the sustainability of plastics waste recycling in this region.

All PRO EUROPE members are highly aware of their environmental, economic and social responsibilities, both in Europe and abroad. We also agree that local recycling is a better option as long as this is in line with free trade and international competition rules. Within this context, PRO EUROPE members do their utmost to ensure that recycling of EU plastic waste in the Far East is sustainable from an environmental, economic and social viewpoint.

PRO EUROPE believes the sustainability objective is achieved and explains how in responding to the EUPR press release.

EUPR says: ‘From an environmental viewpoint, the export of the European plastics waste to be treated in the Far East is far from being a sound policy. The greenhouse gas (GHG) emissions increase significantly if the plastics waste is recycled in the Far East compared to Europe. As a matter of fact, additional GHG emissions are due to additional transport involved (going as a waste and returning as a product) and to the inefficient energy mix of these countries. According to a recent study, ‘recycling nearly 300,000 tonnes of PET bottles into fibre in Europe, rather than in China, cuts global emissions by a further 175,000 tonnes a year’.

Export of plastics waste for recycling has not necessarily a higher environmental impact.

¹ ARA (Austria), CEVKO (Turkey), CONAI (Italy), CSR (Canada), DSD (Germany), Eco-Emballages (France), EcoEmbes (Spain), ECO-ROM (Romania), ECO-PACK (Bulgaria), EKO-KOM (Czech Republic), Eko-Ozra (Croatia), ENVI-PAK (Slovakia), ETO (Estonia), FOST Plus (Belgium), Green Dot Cyprus (Cyprus), Grønt Punkt Norge (Norway), GREENPAK (Malta), HeRRCo (Greece), LZP (Latvia), NEDVANG (Netherlands), Öko Pannon (Hungary), PYR (Finland), REPA (Sweden), REPAK (Ireland), Rekepol (Poland), SLOPAK (Slovenia), Sociedade Ponto Verde (Portugal), UkrPec (Ukraine), Valorlux (Luxembourg), VALPAK (UK), Zaliasis Taskas (Lithuania)

Sending plastics waste e.g. to China can actually save carbon emissions and produces less carbon dioxide (CO₂) than sending them to landfill at home and using brand new materials.

Emissions caused by transporting the plastics waste to China account for only a small amount of the CO₂ saved by recycling. Moreover, due to the imbalance of trade between China and the European Union, the majority of container ships head back to China empty and they are producing CO₂ emissions whether or not they are carrying cargo. If this is taken into account, the transport emissions are even smaller.

The demand for plastics is higher in the Far East because that is where most products are manufactured and thereafter imported in Europe. Questioning this demand and production would be equivalent to suggest protectionist policies vis-à-vis any imports from third countries which would be contrary to international rules.

A recent study² commissioned by WRAP (Waste & Resources Action Programme) provides further guidance on the CO₂ emissions associated with the transport of recovered plastic bottles from the UK to China and shows that the benefits of recycling are not outweighed by transport.

EUPR also states: “there is a tax flow from Europe to the Far East. The European tax payers are financially penalised for every products they buy (Green Dot fee passed to the customer) and throw (garbage bag tax). This huge amount of money should be used to increase the collection systems’ efficiency, permitting better recycling rates at a lower cost and with a lower environmental impact. However, at present, part of this money indirectly supports the Far East recyclers who have lower costs than the European ones ... the social conditions in the Far East are far from being comparable to European standards. From an ethical point of view, Europeans cannot tolerate that their waste is treated by companies that do not apply with European social standards, working security and, in the worst cases, child labour.”

There is confusion here between taxes and green dot fees. Green dot fees are not taxes. They are a fund raising measure to meet specific legal recycling targets. They consist of a financial contribution paid by industry to a qualified national packaging recovery organisation, set up in accordance with the principles defined in EU Directive 2004/12/EC on packaging and packaging waste and the respective national laws. These fees have been used by Green Dot organizations to efficiently fulfill the Packaging Directive legal requirements, and are the symbol of the successful implementation of producer responsibility by the companies involved.

Economic sustainability alongside with the environmental sustainability is at the centre of recovery organizations operations. Operating in a free market means that systems are free to choose whichever end market best suits their needs in terms of price and quality - sometimes this means European destinations, sometimes in third countries depending on material demand. None of the recovery

² WRAP (Waste & Resources Action Programme), [“CO₂ impacts of transporting the UK’s recovered paper and plastic bottles to China”](#), August 2008

organizations would send materials to the Far East to charge their customers more. By definition export only happens where it would cost more to recycle locally.

As far as social sustainability is concerned, our recycling partners abroad have to fulfill legal quality standards. Their exploitation conditions have to be broadly equivalent to the conditions specified by the Member States.

Finally, EUPR says: “Environmental, social and economic variables constitute the three sustainability pillars. The waste export policy does not fulfil any of these essential variables. Thus, European waste export should be limited, and local treatment should be favoured. EuPR calls for the European collection systems to act in a sustainable way by reducing the export of plastics waste to the Far East and by supporting their local treatment.”

Beyond being based on inaccurate assumptions, this call is directed to the wrong recipient. It is not up to European collection systems to support local treatment and limit exports to the Far East. Should the lack of sustainability of plastics waste export be founded, it would be the responsibility of policy-makers to design a legislation that would ensure sustainability. In the current state of play, PRO EUROPE believes that the three pillars of sustainability are fulfilled. Our members actually contribute to meeting these objectives in a cost effective way.

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