

**Public consultation on reducing marine litter: actions on single use
plastics and fishing gear
– Contribution Independent Retail Europe –
Explanatory Support Document**

Part B

Q1

Independent Retail Europe agrees on the need to reduce waste and littering, inter alia of single use plastics. Our members therefore have already many respective measures in place. Please allow me the general comment though that Q1 is a leading question. It is very unlikely that a large number of well-educated, environmental aware stakeholders or citizens would regard these issues as “not important”.

Q2

2a)

See comment to Q1.

Q3

Pollution through plastics is an international problem and should therefore be tackled at all levels, international, national and regional. The EU should mainly focus on setting the framework and agenda for member states as well as on financing the development and production of innovative, environment friendly alternatives. Industry should reduce the amount of these products or research for better alternatives.

Q4

The EU should mainly focus on setting the framework and agenda for member states as well as on financing development and production of innovative, environment friendly alternatives.

Q5

According to Independent Retail Europe, all of these items are harmful for the environment and their waste should be reduced. In order to prioritise, the environmental impact of each item needs to be properly analysed – with more in-depth instruments than this public consultation.

Q6

This question is directed at consumers and producers. Independent Retail Europe represents groups of independent retailers.

Q12

- Applying the EPR principle could be part of the solution if it is clearly defined that these costs should be recovered from cigarette companies and producers of sanitary towels and not by the retailers (as additional “waste producer”).
- Retailers have no way of controlling what consumers do with their waste and consumers are unlikely to collect and return e.g. their cigarette butts or sanitary towels to the store. Used sanitary applications are also likely to develop unpleasant smells when stored for too long.
- However, sanitary towels should not be regulated in the same way as cigarettes. Sanitary towels are a necessity for 50% of the world population. Therefore, any measures that would increase their price should unconditionally be avoided.

Q14

A. Items already captured in separate collection schemes (mainly packaging: such as drink bottles):

- The Inception Impact Assessment on marine litter with the deadline of 12 January suggested stricter implementation of existing legislation. Independent Retail Europe agrees that there should always be a focus on proper enforcement of existing rules rather than generating new ones.
- However, the principle of proportionality should be followed.
- Deposit return schemes (DRS) have had – at best – mixed successes in different member states. These types of measures should therefore not per se be encouraged on EU level but should be judged on a case-by-case basis. Some thoughts on this issue:
 - ⇒ It is important to note that a number of European countries which have a deposit return scheme in place for one-way plastic bottles previously had similar DRS for refillable plastic or glass bottles. This means that consumers were already accustomed to returning refillable bottles before, therefore in many of the countries with DRS, the decision to introduce a DRS on one-way containers was more an evolution of the scheme rather than a revolutionary policy to increase recycling.
 - ⇒ It can be questioned whether a DRS is the perfect solution to try to increase recycling and reduce litter. Instead, other options should be considered as part of a more holistic approach to promote the circular economy, for example, increasing consumer awareness or investing more in existing kerbside collections or on-the-go recycling infrastructure.
 - ⇒ A DRS should not be introduced at the expense of household recycling collections.
 - ⇒ Moreover, we have concerns about the impact on retailers especially related to containers being returned to a shop for recycling, either manually at the shop counter or through an automated Reverse Vending Machine (RVM) in-store. In this context, the size of a store should also be considered. Especially small retailers should not be required to have rubbish collection and sorting stations on their shop floor. The problem of space is however not only a concern for small retailers. In addition, deposit return schemes are usually also associated with considerable joining and handling fees. All in all and especially when newly introduced, would potentially put high administrative and financial burdens on groups of independent retailers.



- ⇒ Already today, many countries feature a multitude of waste management rules and take-back schemes connected to retail stores, which are seen by independent retailers as a very large burden. We should not add to this further.
- ⇒ Last but not least, health and safety concerns should be considered. Retaining bags of returned containers behind the till could represent a health and safety risk for staff both in terms of trip and hygiene hazards.

B. Items which could be replaced by more sustainable alternatives (e.g. take-away food containers, disposable cups, possibly caps and lids, cotton buds, cutlery, straws and stirrers):

- The idea to shift to re-useable cups is interesting. However, Member States would need to invest in extensive public campaigns in order to achieve a sustainable change in consumer behavior beyond the littering problem. Consumers need to be aware of better choices and need to change in terms of moving away from a throw-away society.
 - ⇒ Two practical examples:
 - a. One of our Nordic members tried to sell fresh milk in re-usable glass bottles but the consumers rarely returned the bottles.
 - b. A retailer can offer canvas bags in their store, but if the consumer buys a new one each week and accumulates 40 – then this does not solve the problem. The same will be the case with all reusable items: consumers need to reuse it in their daily life – every day for it to pay off.
- We support the idea of encouraging producers to produce eco-friendly alternatives to plastics or into eco-plastics but only through positive incentives, not through sanctions.

C. Items for which there are no readily available alternatives (non-packaging: cigarette butts, sanitary applications, etc.):

- Independent Retail Europe very much supports the idea of publicly funded awareness campaigns to reduce littering of these items, which was inter alia mentioned in the Inception Impact Assessment on marine litter with the deadline of 12 January.
- Applying the EPR principle would be acceptable if it is clearly defined that the costs should be recovered from cigarette companies. (Please see also our comment on Q12).
- It should be noted again that sanitary towels are a necessity for 50% of the world population and should not be regulated in the same way as cigarettes etc. New measures should not increase the consumer prices.

Concluding remarks

Independent Retail Europe welcomes the Commission recognising the need to establish clear definitions of “biodegradable” and “compostable plastics”.



At this stage, no judgment can be made over choosing biodegradable vs non-biodegradable plastic without knowing exactly a) what kind of material we are talking about and b) whether there is a dedicated waste management process in place.

For example, there are certain bio-based plastics, that are biodegradable but if collected with regular plastic they “taint” the waste stream for regular plastic and all the plastic has to be burned in the end.

On the other hand, there are other bio-based plastics that can be recycled with regular plastic but are made of materials that are sometimes associated with deforestation or other environmental problems.

Therefore, it has to be determined out of which material it is made of, the impact of the entire life cycle and the proper disposal in the end before judging on the benefits of a bio-based plastic material. Independent Retail Europe therefore very much welcomes the Commission’s promise to take action in this field.

We ask policy makers to establish a clear definition of “micro plastics”.

Independent Retail Europe supports that the Commission suggests taking voluntary commitments, awareness raising campaigns as well as research into alternative products and materials into consideration.

This in addition to proper enforcement of existing rules should be the primary focus instead of additional legislative measures.

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*Established in 1963, **Independent Retail Europe** (formerly UGAL – the Union of groups of independent retailers of Europe) is the European association that acts as an umbrella organisation for the main groups of independent retailers in the food and non-food sectors.*

Independent Retail Europe represents retail groups characterised by the provision of a support network to independent SME retail entrepreneurs; joint purchasing of goods and services to attain efficiencies and economies of scale, as well as respect for the independent character of the individual retailer.

Our members are groups of independent retailers, associations representing them as well as wider service organizations built to support independent retailers.

Independent Retail Europe represents 23 groups and their over 369.000 independent retailers, who manage more than 591.000 sales outlets, with a combined retail turnover of more than 946 billion euros and generating a combined wholesale turnover of more than 288 billion euros. Together they employ more than 6 million persons.

More information about Independent Retail Europe under www.independentretaileurope.eu

