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## **Danish comments and views on the European plastic strategy**

Dear Commissioners,

Plastic pollution is a very important issue. Therefore we want to take the opportunity to present Danish views and ideas for the European plastic strategy.

In collaboration with fellow Nordic Ministers of the Environment a two-year Nordic Plastic programme to reduce the environmental impact of plastic has been launched. In addition the Danish government has decided to initiate a national plastic action plan, when the European plastic strategy has been presented. We find it important that the European plastic strategy includes effective measures to:

- Include the civil society in reduction of plastic pollution
- Ban microplastic beads in personal care products
- Phase out problematic additives and constituents in plastic
- Reduce the overall waste generation and short lived products e.g. by showing the opportunities through new large scale innovation projects, by supporting preventive circular business models and through measures to reduce certain single-use plastic products e.g. in take away food packaging
- Increase recycling, and promote high quality and functional markets for secondary plastic materials, with a stable supply and adequate amounts of high quality materials free from problematic substances
- Secure standardized basis for national efforts to reduce microplastic in the aquatic environment

We trust the Commission to be ambitious and to apply long term thinking when broadly addressing the challenges posed by plastic consumption and disposal and to include the entire value chain. The problems related to plastic are not merely a waste management issue, and need to be solved by also establishing new plastic value chains and replacing the current "take-make-dispose" system with a circular system, recirculating high quality waste material streams to be used in new high

quality products, without compromising health and safety. We encourage the Commission to consider this aspect in relevant legislative measures that are proposed across the sectors.

We have noted with satisfaction that the Commission has included the issue of polymers in the REACH review which is expected in December and further that other initiatives have been launched to build knowledge on how to identify and handle problematic additives and constituents in plastic. We would like to suggest, that these initiatives lead to an increased focus on problematic additives and constituents in plastic and to the development of a work plan for the phase-out of such substances.

We also advise that the forthcoming plastic strategy includes a focus on microplastic in natural and manmade water systems. The reduction of microplastic in water systems necessitates common European definitions, as well as standardized methods of analysis.

It is central that the Commission supports the strengthening of the knowledge base for this area, so that measures can be based on a solid foundation of knowledge and scope, and that the European Commission as a separate focus area includes knowledge generation at a European level in the European plastic strategy. As one example of this, in regards to marine litter and especially microplastic, it is important to close some of the knowledge gaps in this area such as harmful effects of microplastic and the degradation of macroplastic to microplastic in the ocean. Increased knowledge on not only the sources, but also the scope of the issues at hand and on how the plastic escapes from land- and sea-based sources (e.g. ghost nets and dolly robes), allows for initiation of more targeted and efficient measures.

We note the importance of the UN 2030 Agenda for Sustainable Development, and therein Sustainable Development Goal 14 and its target 14.1, which seeks, by 2025, to 'prevent and significantly reduce marine pollution of all kinds, in particular from land-based activities, including marine debris and nutrient pollution'.

We recognise the work launched by the Commission to analyse the proficiency of bioplastics. We are looking forward to see the results of the report, and we hope that the Commission will take the appropriate measures once the results are known. Based on the compelling knowledge specifically on oxo-degradable plastics, we call upon the Commission to avoid this material.

There are several concrete Danish examples that have proved to be effective in reducing plastic pollution, waste reduction and increasing the quality of plastic waste to ease circularity such as the marine environment patrols, recycling of fishing nets, the Danish phthalate strategy, reusable food packaging, deposit and return systems for beverage containers, the Danish microplastic partnership, and economic instruments that supports the waste hierarchy. A case catalogue describing these examples in more detail is attached as a separate appendix to this letter.

Establishing new plastic value chains requires a supportive regulatory framework across Europe and working in tandem with businesses to find good solutions. It is our hope that our Danish examples will inspire the Commission to include measures that support initiatives like these.

Yours sincerely,

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