



Ministry of the Environment and Energy Sweden

Minister for the Environment
Karolina Skog

**La secrétaire d'Etat auprès
du ministre d'Etat**

10 January 2018

M. Frans TIMMERMANS
First Vice-president of the European
Commission

Copy to:

M. Jyrki KATAINEN,
M. Karmenu VELLA,
Ms. Elżbieta BIENKOWSKA

Dear First Vice-president,

The European Commission will soon release its 'European Strategy for Plastics in a Circular Economy', which is a core element of the EU Action Plan for the Circular Economy, published in 2015.

France and Sweden take a serious view of the environmental problems associated with plastic pollution, especially marine plastic pollution. Plastic is the largest and most persistent component of debris encountered in the marine environment and constitutes one of the greatest environmental challenges of our times. We all need to act now – nationally, in the EU and globally. This is why France and Sweden are calling for an ambitious strategy to enable the EU to spearhead this issue. In order to achieve this, the European plastic strategy must be translated into practical measures as soon as possible.

Plastic pollution is a matter of great concern at national level in Sweden and France. Swedish and French authorities remain at your disposal to provide guidance and assistance to achieve an ambitious strategy.

To reduce the adverse environmental impact of plastic, Member States need common legal instruments. We cannot rely on voluntary commitments and awareness-raising alone. Below follow some suggestions that should be considered in the upcoming plastic strategy.

1. Need for sustainable plastic management

Plastic consumption and production must be re-evaluated to improve resource use and offset any adverse impact on the environment. It is clear that we must rethink the ways we produce, consume and exchange goods to stop marine litter. The European strategy must offer guidance for clear political direction and operational action to accurately determine the best course for reducing plastic consumption.

Assessments based on a life-cycle perspective, including the risk of littering, are necessary to identify when plastic is inappropriate to use in a product because of its high environmental impact, and the existence of relevant substitutes. The increase in single-use plastic is only one example of an unsustainable consumption pattern in a circular economy, while 'biodegradable plastics' are another. When biodegradable plastics are not designed to be recycled, they create unwanted littering behaviours. As a result these plastics, and all the energy used to produce them, become waste. Worse still, biodegradable plastics are not degradable in the marine environment, thus greatly contributing to marine litter. More knowledge is required to assess the potential of full degradability. We therefore urge the European Commission to propose measures in its plastic strategy that regulate plastic use and create incentives that make it easy for consumers to make the right choices.

2. Need for a strong political signal on plastic recycling

Plastic recycling must be at the core of plastic production. A strong political signal is therefore expected in the strategy. In theory, plastic is easy to recycle and should not pose a problem in a circular economy, but many obstacles must be overcome before plastics can be considered part of the circular economy. Non-toxic material cycles are a prerequisite for recycling; ensuring the use of only non-toxic materials is essential in order to create a market for secondary materials.

Recycling must also take place in a responsible manner. The EU must take responsibility for all the plastic waste it exports outside the EU, ensuring that it is managed in a way that is safe for human health and the environment. In many cases, plastic waste is exported to countries that, as a result of inadequate waste management systems, contribute to the greatest leakage of plastic waste into the ocean.

To foster a culture of recycling, significant effort is needed concerning the eco-design of plastics. In particular, it is essential that all packaging is designed to be easily recyclable as soon as possible. The European strategy should also promote relevant economic incentive instruments for plastic recycling.

It is important that the EU now analyse the situation and constructively contribute to the full implementation of the Basel Convention and its future development, starting with the ongoing work on marine plastic litter and the review of the Basel Convention's annexes.

3. Need for EU to lead the global fight against plastic pollution

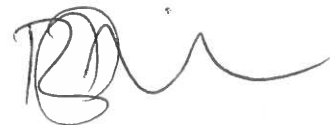
Significantly reducing microplastic pollution of fresh water and seas is a huge challenge. There is a wide range of known and potential sources, many of which are related to wear and tear while the plastic is in use. Once plastic litter and microplastics have eventually found their way into marine environments, clean-up measures are virtually impossible. We expect the Commission to propose measures to address the issue of microplastics.

Beyond European actions, several Member States (Croatia, France, Italy, the Netherlands, and Sweden) belong to 'Stop Plastic Waste', an international coalition focused on plastic bags launched at COP22. Several Member States, including Sweden and France, also made a voluntary commitment at the UN Ocean Conference to ban plastic microbeads in cosmetics. This major conference adopted a declaration in which marine litter and microplastics are particularly in focus (as reflected in UN General Assembly resolution 71/312 'Our ocean, our future: call for action'). The momentum of international action on plastic was recently reinforced as the third UN Environment Assembly (UNEA-3) adopted a resolution on marine litter and microplastics, setting up a process involving an expert evaluation of options to strengthen international governance. The EU has already presented the publication of its plastic strategy as the first of its 20 voluntary commitments at UNEA-3. It is essential for the EU to support the implementation of the UN Environment Assembly's resolution. The European Commission's strategy must reflect this ambition.

Yours sincerely,



Karolina Skog



Brune Poirson