



Keep Sweden Tidy's view on the

Proposal for a regulation on preventing plastic pellet losses to reduce microplastic pollution COD 2023/0373

26th January 2024

Keep Sweden Tidy Foundation (KST)

General

KST is positive towards this important proposal from the commission. In general, there is a great need to have stricter and faster implementation of regulations in order to prevent microplastic entering nature. The harm done by chemicals in plastics is unclear when they end up in nature. The precautionary principles should be implemented in regards to the handling and use of plastics.

We welcome this regulation detailing competent authorities, certificates, training, compliance, methodology, access to justice and penalties. This regulation sets a precedent. We agree with the Commission that plastic pellet losses are due to a lack of awareness and poor handling and that a new legal measure will prevent such pollution. We agree that plastic pellets are a primary candidate for this kind of policy intervention. We would also like to take the opportunity to stress the importance of the EU as a driver in the world for a green transition.

Keep Sweden Tidy recommends the following:

1. KST would like to emphasize that all of the suggestions made to "ensure that plastic pellets are handled safely and responsibly at all stages" (from recital 13) could and should also be directed towards the actors involved in macro plastics.
2. When entering nature, macro plastics will eventually become microplastics and if we can work in the same way as proposed for primary microplastics there is a possibility to decrease yet another source of plastic in nature. Too little effort is put into preventing the loss of larger pieces of plastic, especially in the transportation and waste-management phase. We find it is good that transporting pellets is equal to transporting chemically-hazardous material. Europe still has a long way to go to reach the maximum of having only 10% landfill. Landfill, as well as leakage from transportation of plastics, is one of the sources of microplastics working its way into nature. We believe there is a need to make an addendum addressing this problem.
3. Extend this regulation to transport of any waste as well, plastic leakage from waste transport is equally as damaging to nature if not more. We find it very important that the information about plastic pellet transportation is made publicly available. Handling and preventing leakage and how to keep nature tidy is all about information to the handlers as well as the public. Therefore, a register shall be publicly available on a website as mentioned in article 5. Information about plastic pellets, macroplastics and waste transport should be made easily accessible and understandable, and one should be able to subscribe to the information. Information about breaches and reported leakages should also be made accessible to the public on this website.



4. Ensuring the independence of the certifier is important. We agree on strict rules on compliance and reporting as mentioned in article 8. We are fully in agreement that the Commission can use implementing acts for the format of the reports and making sure the structure of this piece of legislation is kept to the highest standards.
5. In conjunction with informing authorities about whether there has been a leakage, as mentioned in article 9, the competent bodies in each member state should be trained in handling a plastic-pellet spill under different conditions. Anyone handling pellets in facilities or transporting them should receive specific training about the material and the hazardousness of the pellets in different types of nature.

We applaud the Commission for this initiative and see this regulation as hopefully being the first of many concerning the handling of different kinds of plastics.

Yours sincerely,

Johanna Ragnartz

CEO, Keep Sweden Tidy