



EurEau Comments on the draft Directive

Reduction of the Impact of Certain Plastic Products on the Environment

Introduction

EurEau welcomes and supports the proposal of the European Commission to reduce the environmental impacts of single-use plastics (SUP). It is fully in line with article 191.2 of the Treaty relating to the application of the precautionary principle and the principles that preventive action should be taken, that environmental damage should as a priority be rectified at source and that the polluter should pay. It also complies with directive 2000/60/EC¹ defining water as a “heritage which must be protected, defended and treated as such” and requiring the protection of drinking water resources and aquatic ecosystems, and the application of the polluter-pays principle.

Comments

Single use plastics and urban waste water treatment

As outlined in the proposal, certain SUP, for example wet wipes, tobacco product filters and cotton bud sticks, may end up in the sewer network due to inappropriate disposal practices.

In most cases, waste water collection and treatment plants remove SUP, but the process is costly and energy-intensive. Moreover, combined sewer overflows may lead to direct release and a part of these plastics – partially in the form of microplastics - may therefore find their way to water bodies with all the negative environmental impacts.

¹ [Directive 2000/60/EC establishing a framework for the Community action in the field of water policy](#)

26 June 2018

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The Commission's impact assessment estimates the cost of remedial action at the level of waste water collection and treatment at €7.7 billion p.a. This represents about 18% of the total turnover of the EU's waste water sector.

Hence, apart from contradicting art. 191 of the Treaty, this solution would be disproportionate from an economic point of view and would seriously jeopardise the affordability of water services and the investment capacity of operators.

Even if waste water treatment plants (WWTP) removed all SUP it would not make them disappear. Even worse, the burden of waste disposal would be placed on waste water operators. Moreover, the mechanical forces in the sewer network (flow, friction, pumping) may lead to the continuous release of microplastics from these products (especially from wet wipes).

Hence, measures must be taken at the source and the polluter pays principle must be applied.

The impact assessment omits one highly relevant cost factor. Wet wipes regularly cause the clogging of pumps and the blockage of pipes in the sewer network. For the UK alone, the cost of clearing blockages in the sewer network are estimated at €115 million per year².

Furthermore, clogged pumps may cause sewer overflows and, thus, release single-use plastics and microplastics to the environment.

EPR schemes must include the waste water infrastructure

EurEau welcomes the Commission's proposal of including wet wipes and tobacco product filters in EPR schemes and awareness raising measures, and requiring the compulsory do not flush labelling of all plastic-containing wet wipes.

Experience clearly tells us that labelling alone will not be effective, and inappropriate disposal by consumers seems difficult to control. In Belgium, wet wipes have carried a "do not flush" label since July 2016, if they fail flushability tests. However, no significant improvement was noticed in the sewer network.

The Commission proposal remains unclear as to whether the costs of waste management and clean-up of litter (article 8 on EPR schemes) includes littering into the sewer network and the actions of waste water operators to unblock the pipes and pumps and dispose of the recovered wet wipes. With a view to effectively implementing the polluter pays principle, EPR schemes must explicitly cover this littering pathway including the related environmental harm and economic damage for waste water operators. This would incentivise plastic-containing wet wipe manufacturers to develop products that respect the environment, i.e. that are easily biodegradable and dispersible and that do not release microplastics.

² [Water UK: Wipes in sewer blockage study - Final Report, Report Ref. No. 21CDP.WS \(2017\)](#)



EurEau amendments

In line with the above, EurEau wishes to put forward the following amendments:

Recital (14)

Commission proposal	EurEau amendment
<p>Certain single-use plastic products end up in the environment as a result of inappropriate disposal through sewers or other inappropriate release into the environment. Therefore, single-use plastic products that are frequently disposed of through sewers otherwise inappropriately disposed of should be subject to marking requirements. The marking should inform consumers about appropriate waste disposal options and/or waste disposal options to be avoided and/or about the negative environmental impacts of litter as a result of inappropriate disposal. The Commission should be empowered to establish a harmonised format for the marking and when doing so should, where appropriate, test the perception of the proposed marking with representative groups of consumers to ensure that it is effective and clearly understandable.</p>	<p>Certain single-use plastic products end up in the environment as a result of inappropriate disposal through sewers or other inappropriate release into the environment. <i>In addition, they may cause substantial economic damage to sewer networks by clogging pumps and blocking pipes.</i> Therefore, single-use plastic products that are frequently disposed of through sewers otherwise inappropriately disposed of should be subject to marking requirements. The marking should inform consumers about appropriate waste disposal options and/or waste disposal options to be avoided and/or about the negative environmental <i>and economic</i> impacts of litter as a result of inappropriate disposal. The Commission should be empowered to establish a harmonised format for the marking and when doing so should, where appropriate, test the perception of the proposed marking with representative groups of consumers to ensure that it is effective and clearly understandable.</p>

Justification

Wet wipes may cause the blocking of pipes and the clogging of pumps in the sewer network. The cost of clearing blockages in the sewer network are estimated at €115 million per year for the UK alone. These costs have to be passed on to the water consumer and jeopardises the affordability of water services.



Determining the fate of products in waste streams including in sewer networks, is a prerequisite to choosing appropriate waste disposal options. To do this, recognised test standards need to be developed.

Recital (15)

Commission proposal	EurEau amendment
With regard to single-use plastic products for which there are no readily available suitable and more sustainable alternatives, Member States should, in line with the polluter pays principle, also introduce extended producer responsibility schemes to cover the costs of waste management and clean-up of litter as well as the costs of awareness-raising measures to prevent and reduce such litter.	With regard to single-use plastic products for which there are no readily available suitable and more sustainable alternatives, Member States should, in line with the polluter pays principle, also introduce extended producer responsibility schemes to cover the costs of waste management and clean-up of litter, including in the sewer network , as well as the costs of awareness-raising measures to prevent and reduce such litter.

Justification

The text remains unclear as to whether the "costs of waste management and clean-up of litter" include waste products disposed of in toilets and ending up in the sewer network. They should be included as they cause economic damage to the sewer network and require waste operators to take additional waste management steps.

Article 8

Extended producer responsibility

Commission proposal	EurEau amendment
1. Member States shall ensure that extended producer responsibility schemes are established for all single-use plastic products listed in Part E of the Annex placed on the Union market, in accordance with the provisions on extended producer responsibility in Directive 2008/98/EC.	1. Member States shall ensure that extended producer responsibility schemes are established for all single-use plastic products listed in Part E of the Annex placed on the Union market, in accordance with the provisions on extended producer responsibility in Directive 2008/98/EC.
2. With regard to the schemes established pursuant to paragraph 1, Member States shall ensure that the producers of the single-use plastic products listed in Part E of the Annex	2. With regard to the schemes established pursuant to paragraph 1, Member States shall ensure that the producers of the single-use plastic products listed in Part E of the Annex



<p>shall cover the costs of the collection of waste consisting of those single-use plastic products and its subsequent transport and treatment, including the costs to clean up litter and the costs of the awareness raising measures referred to in Article 10 regarding those products.</p> <p>For single-use plastic products that are packaging, the requirements laid down in this paragraph supplement the requirements regarding extended producer responsibility schemes laid down in Directive 94/62/EEC and Directive 2008/98/EC.</p> <p>...</p>	<p>shall cover the costs of the collection of waste consisting of those single-use plastic products and its subsequent transport and treatment, including the costs to clean up litter, including from the sewer network, and the costs of the awareness raising measures referred to in Article 10 regarding those products.</p> <p>For single-use plastic products that are packaging, the requirements laid down in this paragraph supplement the requirements regarding extended producer responsibility schemes laid down in Directive 94/62/EEC and Directive 2008/98/EC.</p> <p>....</p>
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Justification

The text remains unclear as to whether the "costs of waste management and clean-up of litter" include waste products disposed of in toilets and ending up in the sewer network. They should be included as they cause economic damage to the sewer network and require waste operators to take additional waste management steps.

Article 10

Awareness raising measures

Commission proposal	EurEau amendment
<p>Member States shall take measures to inform consumers of the single-use plastic products listed in Part G of the Annex and fishing gear containing plastic about the following:</p> <p>(a) the available re-use systems and waste management options for those products and fishing gear containing plastic as well as best practices in sound waste management carried out in accordance with Article 13 of Directive 2008/98/EC;</p> <p>(b) the impact of littering and other inappropriate waste disposal of those</p>	<p>Member States shall take measures to inform consumers of the single-use plastic products listed in Part G of the Annex and fishing gear containing plastic about the following:</p> <p>(a) the available re-use systems and waste management options for those products and fishing gear containing plastic as well as best practices in sound waste management carried out in accordance with Article 13 of Directive 2008/98/EC;</p> <p>(b) the impact of littering and other inappropriate waste disposal of those</p>



products and fishing gear containing plastic on the environment, and in particular on the marine environment.	products and fishing gear containing plastic on the environment, and in particular on the marine environment. (c) the impact of inappropriate waste disposal of those products on the sewer network.
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Justification

The sewer network is not only a potential pathway of certain single use plastics to the environment, it also suffers substantial economic damage from inappropriate waste disposal. Consumers must be made aware of it. Numerous campaigns have been launched by the water sector, but more needs to be done.

Examples for awareness raising campaigns regarding wet wipes:

- UK: Can't flush this! <https://www.youtube.com/watch?v=X-FB46km7bo>
- D: Feuchttücher gehören nicht in die Toilette und Kanalisation: <https://www.youtube.com/watch?v=OPQ4Tfx0HCk>
- D: Feuchtes Toilettenpapier verstopft Kläranlagen | Servicezeit | WDR: <https://www.youtube.com/watch?v=T4IFGTZ6aSI>
- E: Matilda - Las toallitas a la papelera: <https://www.youtube.com/watch?v=vXkMK76UE50>
- E: Las toallitas no deben ser desechadas por el WC: <https://www.youtube.com/watch?v=7j2Tw7b5Fsc>
- DK: Kun 3 ting i dit lokum: <https://www.kun3tingiditlokum.dk/>



About EurEau

EurEau is the voice of Europe's water sector. We represent drinking and waste water service providers from 29 countries in Europe, from both the private and the public sectors.

Our members are the national associations of water services in Europe. At EurEau, we bring national water professionals together to agree European water industry positions regarding the management of water quality, resource efficiency and access to water for Europe's citizens and businesses. The EurEau secretariat is based in Brussels, from where we coordinate the work of around 150 experts from member organisations and utilities and advocate common positions with EU decision makers.

Our members are fully committed to the continuous supply of clean water and its safe return into the water cycle. We have a role in raising awareness of threats to the water environment. With a direct employment of around 500,000 people, the European water sector makes a significant contribution to the European economy.