



**EUREAU Contribution to the green paper
on a European Strategy on Plastic Waste in the Environment
(COM(2013) 123 final)**

EUREAU is the European Federation of National Associations of Water Services listed on the EU Transparency register under number: 39299129772-62.

EUREAU welcomes the Green Paper on a **European Strategy on Plastic Waste in the Environment** of the European Commission COM(2013) 123 final and the stakeholder consultation launched from 07.03.2013 to 07.06.2013. EUREAU and its members recognize the policy and environmental challenges posed by plastic waste which are at present not specifically addressed in the EU Waste legislation.

Most of the questions of the consultation are waste oriented and hence do not directly apply to our sector ; EUREAU and its members however are concerned about the discharges of flushable plastic litter with stormwater and sewer overflows, as well as about the occurrence of micro plastics in wastewater and drinking water resources as an emerging new topic.

We agree that focus should be put on applying the waste hierarchy to plastic waste management. We furthermore emphasize that as long as sources of micro plastics in wastewater and drinking water resources are not identified, nor their impact on the (marine) environment or the water sector, at least the use of micro plastics in consumer products should be restricted or forbidden.

Question 14: How can challenges arising from the use of micro plastics in products or industrial processes and of nano-particles in plastics be best addressed?

EUREAU and its members are concerned about the use of innovative/virgin micro plastics instead of natural scrubbing particles by producers in some consumer products (eg. creams and shower gels). Municipal wastewater treatment systems do not remove these adequately. The use of micro plastics in consumer products should be restricted as much as possible or even forbidden.

Question 23: What actions other than those described in this Green Paper could be envisaged to reduce marine litter? Should some marine litter related actions be coordinated at EU level (e.g. by setting up a coordinated European Coastal Clean-up Day to raise awareness)?

EUREAU agrees that successful implementation of waste policy is a key prerequisite to avoid plastic litter entering the marine environment and setting targets can add to this. Other actions: There should be awareness campaigns that plastic litter does not belong in the wastewater. This can be done on a national basis.

Question 24: In its proposal for a new Environment Action Programme the Commission suggests that an EU wide quantitative reduction target for marine litter be established. How can the setting of such a target provide added value to measures that reduce plastic waste generally? How could such a target be developed?

Targets can help to involve all stakeholders and to force politicians to address the issue with more priority. This is not directly an issue for the water sector, but we will benefit from it. Rather than putting any target for reduction of Marine litter, original sources of marine litter and potential source control actions should be identified. Impacts of marine litter and potential cost and benefits of control measures should be studied.
