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Position of the Polish Union of Plastics Converters regarding the Act on packaging and packaging waste management dtd. 13.06.2013

Polish Union of Plastics Converters / PUPC / with interest follows the changes in the Polish legislation on the issue to increase the recovery and recycling of packaging waste. Considering that currently in Poland about 70 % of municipal waste is going to landfill, while the packaging are the main stream of the waste, the problem is very important not only in terms of environmental pollution. It is also important because of the possible penalties that threaten to Poland from the European Union for not achieving appropriate goals in this field. In addition, the planned revision of the Directive 94/62/EC laying down minimum levels of recovery and recycling of packaging waste and possible drastic changes in order to increase the recovery and recycling of packaging may further increase the pressure to achieve better results in the waste management.

PUPC believes, that through appropriate regulations, prohibitions and incentives system, Poland can achieve much better results in the selection of plastic packaging than today. Levels of recovery of municipal waste of plastics that reach our neighbors such as Germany, Sweden, and Norway are more than 90%, while Poland only exceeds 40%.

Polish Union of Plastics Converters positively assesses changes in regulations related to the introduction of the Act on packaging and packaging waste in the context of the obligations of entrepreneurs entering the packaging on the market. The obligation to achieve an appropriate level of recovery of packaging waste from households, imposed on recovery organizations, can improve the situation in waste management. We assess positively the new provisions of the Act, which require entrepreneurs placing packaging on the market and packaging recovery organizations to make expenses on education campaigns. As we can observe, even in countries with very good organization of waste management, problem of littering the environment still exists and has not been fully resolved. Only the proper education of consumers, in order to develop environmentally friendly behavior, can significantly reduce this problem. However in our opinion, the only long-term environmental policies, as in the EU countries with successful waste management, is likely to lead to effective improvements. The consumer education in this area starts there from an early age.

In 2002 recovery organizations were established in Poland. They supposed to be an important element of the waste management system in order to increase the recovery and recycling, but in our opinion it did not happen. According to us the new regulations, unfortunately, will not result in total improvement in this regard. The share capital increase of recovery organizations will not cause a significant reduction of their

quantity and the competition between them does not lead to the goal of achieving higher levels of recovery and recycling.

In our opinion, achievement of good results in this matter is not possible without the ability to effective support of recyclers. Competition between recovery organizations also had a direct impact on the drastic decline of subsidies to the collecting of recycling materials.

Subsidies, that were to be a motivation for the recovery of raw materials for plastics, decreased from about 500 PLN/tonne to a few PLN over 10 years. It was the largest decrease compared to payments to collection of all other materials such as glass, where the drop is small (from 60 to 50 PLN). The possibility of confirming the obligation to recovery by inappropriate entities and the lack of an effective verification of documents offer the possibility of artificial overproduction of evidence of recovery and recycling.

In the opinion of PUPC the new regulations do not completely liquidate the main problem, which is a gray zone, where the evidence of the recovery and recycling does not reflect the real stream of selected waste or multiple issue of documents on the same waste stream of recycled material. It is hoped that this problem will be alleviated in 2016 upon the introduction of audits.

In regard of this PUPC proposes to amend the provisions of the Act on packaging and packaging waste or specific provisions that will:

1/Sealing the system of waste flows from the source to RIPOK or recycler, including plastic waste in order to eliminate the gray zone of trade documents of confirming the recovery and recycling. Remove from the system the recovery organizations, that do not perform the tasks in order to improve the functioning of the packaging waste management.

2/Increase of subsidies for collection of recyclable materials in order to achieve a level that will restore the profitability of the actual collection and recycling of certain materials, especially plastics.

3/ Much effective verification of companies authorized to edit documents of confirming the recovery and recycling.

4/Further orientation of the recovery organizations in order to reduce pointless competition between them to make them responsible for building an efficient system of waste management and consumer education.

5/Further extend of companies liability, which enter packaging on the market to make them care for the placing recyclable packaging on the market .

6/Limitation of disposal of plastic waste through higher fees for the disposal of waste in the process of coming to a total ban on the storage for use in recycling.

Polish Union of Plastics Converters also proposes to develop and implement a long term education policy in waste management in order to develop ecologic behavior of society.

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