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**The position of the Polish Union of Plastics Converters on the draft EU Directive, amending Directive 2008/98 / EC on waste, 94/62 / EC on packaging and packaging waste, 1999/31 / EC on the landfill of waste and other directives on waste vehicles, batteries and accumulators and WEEE.**

Polish Union of Plastics Converters welcomes the changes proposed by the EU, reaching towards higher levels of selection and recovery of waste, in order to reduce their impact on the environment. PUPC is vitally interested in improving the levels of selection and recycling of municipal waste including mainly plastic waste. Uncontrolled waste ending up in the environment negatively affect the image of the industry, but also be capable of being used in production. The level of supply of raw materials from recycling can positively influence the general level of prices of raw materials necessary for the processors.

We support the EU's objective of achieving the 2020 level of 50%, and by 2030 70% recycling and reuse for municipal waste. We agree on the position that you should not support combustion of the waste that can be technically and economically feasible recycled. Although PUPC welcomes the increased rates of recycling it may raise some doubts on applied by the EU Commission methodology for the calculation of recycling. In our opinion, this issue should be further discussed and analyzed.

In the context of the proposed changes reflect the problem of the transposition of directives and implementation of them into practice in such a way as to effectively improve waste management in Poland. The current state of the organization of the collection of hazardous waste in Warsaw alone is not optimistic. On the whole area of the capital one collection point seems absolutely insufficient - it is easy to conclude how residents of the capital getting rid of this type of waste.

When it comes to packaging, the proposed amendments of Directive 94/62 / EC, introduce levels of recovery for plastics 45% (2020) and 60% by 2025. Compared to the required 22.5% in 2014, this is a very serious growth. However, given the current achieved levels of selection and recycling of plastic packaging in Poland in excess of 40%, chances comply with the required project objectives. Despite the growth and exceeded 40% recovery level of post-consumer plastic waste in Poland, it seems that simple mechanisms of improve the recovery of plastic waste and other waste running out. Further increasing the levels of recycling and re-use requires more complex operations such that have worked in countries having in this respect much better performance. Still about 60% of plastic waste in Poland goes to landfill. The incentive for the residents, as lower payment by several PLN per month for the provision of selective waste rather than mixed, seems to be insufficient. In conjunction with the lack of a mechanism to verify the declaration for the selection of waste as well as the

lack of a mechanism for monitoring of provided by the residents selective waste can be said that we are at the beginning of the road to the proper management of waste.

The EU document draws attention to the serious discrepancy between certain groups of countries in achieving the effects of municipal waste management. Belgium, Germany and Austria, leading in this respect, achieve development levels so high that only a few percent of the total mass of post-consumer waste going to landfill is processed into a neutral form for the environment. It should also be noted that these countries have a complete ban on untreated landfill.

The basis for achieving higher levels of recovery in Poland should be to create a complex system of waste management, which requires the active participation of all stakeholders, ie. Citizens, businesses (both manufacturers of consumer goods, as well as receiving and processing waste) and state institutions. At the state bodies are obliged to create such a system, together with the mechanism of financing and appropriate stimulation stakeholders.

Polish Union of Plastics Converters also proposes to develop and implement a long term education policy for the conduct of management - it seems that without such measures ecological behavior cannot be developed

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