

IRRESPONSIBLY MANAGED PLASTIC WASTE TRADE HAS NO PLACE IN A CIRCULAR ECONOMY

THE PLASTIC WASTE TRADE MANIFESTO



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IRRESPONSIBLY MANAGED PLASTIC WASTE TRADE HAS NO PLACE IN A CIRCULAR ECONOMY

Plastic waste trade creates immeasurable harm to society, health and the environment. This is felt disproportionately across the world, and has been happening for decades. While those benefiting from plastic waste trade argue that it is necessary in a globalised circular economy, we believe that **plastic waste trade disregards the proximity principle and evades responsibility for ensuring correct waste management and is therefore unfit for a true and safe circular economy.**

We cannot aim to achieve a truly safe circular economy with ambitious reductions in resource use, while we continue to offload the burden of our plastic waste elsewhere. This manifesto is a call to European Union institutions to legislate, through the Waste Shipment Regulation, an end to plastic waste exports from the Union and intra-EU management of European plastic waste. This is in line with a genuine circular economy, as outlined in the Circular Economy Action Plan and Green Deal.



THE ISSUE

The European Union relies heavily on international trade for its overconsumption of plastic and subsequent plastic waste management. In 2019, the EU exported a monthly average of 150,000 tonnes of plastic waste beyond its borders.¹ **One third of plastic packaging destined for recycling is shipped outside of EU territory.**²

Exporting plastic waste allows the EU to avoid its responsibility to deal with high volumes of waste and more difficult-to-treat plastic, externalising the true costs of proper waste management to other countries whose treatment infrastructures are often already overwhelmed. EU plastic waste exports take both legal and illegal paths³ - taking advantage of the lack of transparency around waste shipments both inside and outside the EU. This is:

A social justice issue

Plastic waste mainly flows from Global North to Global South countries. Most importing countries cannot always ensure this waste is managed in a manner that minimises harm to human health and the environment. Shipment to and mismanagement of plastic waste in illegal operations is rife, and the resulting toxic burden exacerbates global inequalities.⁴

An environmental issue

Some plastics are intrinsically toxic, while others have toxic additives that can leach into the environment, including during recycling operations. Recycling operations can lead to significant chemical and microplastic pollution⁵ of water bodies when wastewater is not adequately filtered. Mismanaged plastic as well as substances and chemicals from mismanaged and traded plastic waste are harmful to the environment and - either through leakage, residuals, burning, dumping or landfill - are found in our air, water and soils.⁶ Additionally, traded plastic waste contributes to direct plastic leakages in the Ocean.⁷

A human health issue

These substances, through leaking into the environment as a consequence of mismanagement are harmful to human health.⁸ They can subsequently directly impact the health of local communities living near places where mismanagement happens, or indirectly, through the contamination of crops through soils and water pollution.

1. European Environment Agency, 2019. The Plastic Waste Trade in the Circular Economy. Available at: <https://www.eea.europa.eu/publications/the-plastic-waste-trade-in>
2. European Court of Auditors, October 2020. Review No 04/2020: EU action to tackle the issue of plastic waste. https://www.eca.europa.eu/Lists/ECADocuments/RW20_04/RW_Plastic_waste_EN.pdf
3. Interpol, August 2020. INTERPOL STRATEGIC ANALYSIS REPORT: Emerging criminal trends in the global plastic waste market since January 2018. https://www.interpol.int/en/content/download/15587/file/INTERPOL%20Report%20_criminal%20trends-plastic%20waste.pdf
4. Global Alliance for Incinerator Alternatives. 'DISCARDED: Communities on the Frontlines of the Global Plastic Crisis', 2019. <https://wastetradestories.org/>
5. Greenpeace Malaysia. 'THE RECYCLING MYTH 2.0: The Toxic After-Effects of Imported Plastic Waste in Malaysia', 2020. <https://www.greenpeace.org/malaysia/publication/3349/the-recycling-myth-2-0>
6. Global Alliance for Incinerator Alternatives. 'DISCARDED: Communities on the Frontlines of the Global Plastic Crisis', 2019. <https://wastetradestories.org/>
7. Bishop, George, David Styles, and Piet N. L. Lens. 'Recycling of European Plastic Is a Pathway for Plastic Debris in the Ocean'. Environment International 142 (1 September 2020): 105893. <https://doi.org/10.1016/j.envint.2020.105893>
8. Center for International Environmental Law. 'Plastic & Health: The Hidden Costs of a Plastic Planet', 2019. <https://www.ciel.org/wp-content/uploads/2019/02/Plastic-and-Health-The-Hidden-Costs-of-a-Plastic-Planet-February-2019.pdf>



A LOOPHOLE IN THE EU CIRCULAR ECONOMY

Circular economy policies often merely suggest to *increase* the degree of circularity in a system, or of the volume of materials circulating within it. Yet, a *true* circular economy has, at its core, the objective to reduce resource extraction and consumption⁹ through reduction, prevention and reuse measures, while avoiding causing social harm and exacerbating global inequalities.

Although the global trade of some waste materials, with strong safeguards, may happen, the nature of why and how we trade plastic waste internationally is fundamentally incompatible with a true circular economy; instead, the global plastic waste trade has revealed itself to be one of its gaping loopholes:

- **The current linear nature of our extra-EU plastic waste trade is motivated by the wrong economic reasons such as low oil prices facilitating virgin plastic production, rendering domestic recycling less competitive and is based on low labour and environmental compliance costs;**
- **The international export of EU plastic waste includes a significant amount of unrecyclable or difficult-to-treat plastics;**

- **The global plastic waste trade is not transparent as a result of a fragmented notification system, underregulation and lack of traceability;**
- **Plastic waste trade involves significant illegal traffic linked to other forms of organised crime, and leads to illegal practices and shipments;**
- **The current plastic waste trade framework exacerbates producer's irresponsibility as they continue to avoid the much-needed shift to product redesign and reuse, as the costs of treatment are externalised;**
- **Fundamentally, the current plastic waste trade contributes to toxic pollution and environmental damage.**

Therefore, current trade of EU plastic waste lacks the necessary safeguards to contribute to a circular economy. In reality, it has facilitated the proliferation of irresponsible plastic use for many years, and contributed to increased levels of social and environmental injustice.

9. Mayer, Andreas, Willi Haas, Dominik Wiedenhofer, Fridolin Krausmann, Philip Nuss, and Gian Andrea Blengini. 'Measuring Progress towards a Circular Economy: A Monitoring Framework for Economy-Wide Material Loop Closing in the EU28'. *Journal of Industrial Ecology* 23, no. 1 (2019): 62–76. <https://doi.org/10.1111/jiec.12809>



THE WAY FORWARD

Recent changes in the international legislation landscape such as China's blanket ban¹⁰ on plastic waste imports and the Basel Convention's plastic waste amendments¹¹ have helped shed light on the scale of this issue and helped initiate change to (partly) solve the problem.

However, these changes remain insufficient: acknowledging the European Union's translation of the Basel Convention plastic amendments for extra-EU trade currently exceed what is required, the decision to not transpose these amendments for intra-EU trade is unacceptable.¹² Therefore, we demand for the following measures to be adopted throughout the revision of the **Waste Shipment Regulation**:

- **Ban all plastic waste exports outside the European Union** to stop offloading our waste and responsibility to others given sufficient controls are not possible outside of the Union;
- **Fully implement the Basel Convention within the European Union** to respect the EU's obligations with regards to the Convention and implement a transparent, effective and harmonised system which will also facilitate the management of the subsequent short-term increase in intra-EU trade;
- **Complement this process with upstream circular measures on prevention, reduction, reuse and recycling** to embed this waste stream in a true circular economy aiming to prevent plastic waste in the first place.

10. Ministry of Ecology and Environment of the People's Republic of China (2018) Announcement on Adjusting the "Imported Waste Management Catalog" http://www.mee.gov.cn/gkml/sthjbgw/sthjbgg/201804/t20180419_434911.htm

11. 'Plastic Waste Amendments'. <http://www.basel.int/Countries/StatusofRatifications/PlasticWasteamendments/tabid/8377/Default.aspx>

12. Rethink Plastic. 'EU Promotes Greater Global Responsibility on Plastic Waste - but not for internal Market!', 2020 <https://rethinkplasticalliance.eu/news/eu-promotes-greater-global-responsibility-on-plastic-waste-but-not-for-internal-market/>

SUPPORT THE MANIFESTO

The Plastic Waste Trade Manifesto is open to support from Non-Governmental Organisations and decision-makers. To support the manifesto visit the webpage below:

SUPPORT THE MANIFESTO



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