
Statement against bans of EPS in the single-use plastic proposal

In the context of the *proposal for a Directive of the European Parliament and of the Council on the reduction of the impact of certain plastic products on the environment* (the Directive), the European Parliament and Council have proposed banning certain **food and beverage containers** made of expanded polystyrene (EPS).

We share the objectives of the Directive to reduce the environmental impacts of certain products, in particular in the form of marine litter. It must be a priority to stop waste of any kind, including plastic waste, from being littered or leaking into the environment. We would welcome turning the current rise in environmental awareness into an opportunity for all of us to fully endorse a culture of collection and recycling. However, **we call upon the EU institutions to reject the proposed EPS bans**, as they are **unjustified, ineffective, and discriminatory**.

EPS – the facts

EPS is a polystyrene (PS) foam that contains 2% PS and 98% air. EPS is used in both construction and packaging. EPS fulfils **many high-end purposes**, including preserving vital pharmaceuticals and food, protecting electronic and electric appliances during transport, and providing cushioning in helmets and car seats. Affordable EPS building insulation also helps **meet EU goals** of energy efficiency and climate protection.

The European EPS industry generates a turnover of 5-6 billion Euros and employs over 60,000 people. Most of them work in over 1,000 small and medium sized enterprises (**SMEs**).

Of the estimated 20 million tonnes of plastic used for packaging applications, about 0.4 million tonnes are made of EPS. About one in every thousand tonnes of plastic used is EPS for food and beverage containers.

EPS products have no increased risk of being littered

Defying selective perception,¹ **less than 1%** of all litter items found on EU beaches are clearly identified as PS, according to the data on which the Commission has based its proposal.² EPS is not specifically identified at all.

EPS is fully recyclable

Efforts of the EPS industry have already today led to the recycling and energy recovery of almost 67% of EPS waste in Europe. Whilst numbers differ among Member States as with any other material, **recycling rates for EPS** post-consumer packaging waste are as high as **56%** in Austria, **48%** in the Netherlands and **47%** in Germany, showing that **EPS recycling can be economical**. Moreover, the EPS industry has been working towards further increasing EPS recycling by investing in new technologies to **exceed the EU's goals** by 2030.³

EPS products are safe

Styrene, from which all PS is produced, is one of the best-researched substances. EPS has been safely used for decades, including as a food contact material. Of course, the EPS industry also applies the highest EU safety standards to protect its employees and the environment during the production process.

¹ Due to its high air content, foamed PS is indeed visible and distinguishable from solid plastic. However, this does not imply a higher environmental impact. In turn, EPS' characteristics provide the potential for effective separation and sorting. Any concerns regarding the quality of EPS packaging, e.g. its sturdiness, can be effectively addressed in the revision of the essential requirements under Packaging and Packaging Waste Directive.

² Commission impact assessment, part 2, pp. 31 et seq., categories ranking 28 and 53. The EP has claimed that 31% of all plastic beach litter would be PS. This is demonstrably incorrect. The cited litter categories combine PS and other plastic pieces.

³ One key to this is [PolyStyreneLoop](#), an EU LIFE-supported industry project that demonstrates **economically viable closed-loop recycling at industrial scale**. Its innovative process has been **recognised as best practice** in the Staff Working Documents of the **Plastic Strategy** and the Communication on the Interface between Chemical, Product and Waste Legislation (CPW), and as **best available waste treatment technique** in the Basel Convention Guidelines.

Addressing the root causes of marine litter

Poor waste management practices and infrastructure, littering by consumers and the lack of public awareness are the main causes of marine litter, as the co-legislators have recently stated.⁴ EPS' challenge, *as for all materials*, is to establish effective waste management schemes and to encourage consumers to responsibly use and dispose of products. The EPS industry has been contributing to the fight against marine litter by accelerating current activities in **collection, sorting and recycling**, with the objective of significantly increasing **circularity** of EPS products by 2030.⁵ After all, **each product that is recycled or otherwise responsibly disposed of does not end up as litter** in our environment.

Unintended consequences, unexamined impacts and untested alternatives

Singling-out any specific plastic material diverges fundamentally from the approach followed by the Commission in the SUP proposal, which is based on the top-10 plastic *product* categories found in beach litter, regardless of the plastic *material* used. Consequently, there is **neither an impact assessment** for EPS-specific bans **nor an analysis of the alternatives** to the EPS products to be banned.

On the contrary, the Commission proposal already foresees reducing the consumption of SUP food containers and beverage cups in general, and introducing extended producer responsibility (EPR) schemes for them. It clearly states (in recital 15) that it has not proposed banning these categories because there are **no available suitable and more sustainable alternatives**. Thus, banning food and beverage containers made of EPS will **not** lead to the use of **more sustainable alternatives**. More likely, there could be a **regrettable substitution with just another plastic material**, resulting in no improvement of the environmental impact. Furthermore, such other plastic materials could be **imported from outside the EU**.

Additionally, bans that discriminate against certain plastic materials, such as those proposed for EPS, risk having a chilling effect on the **desired investments** in collection, sorting and recycling and **unforeseen spillover impacts on critical supply chains – far beyond food and beverage containers**. Thus, such bans undermine the objectives of the Circular Economy Package and the Plastics Strategy, which revolve around the ultimate goals of **resource efficiency** and keeping material in use for as long as possible.

About us

Styrenics Circular Solutions (SCS) is an industry-led initiative focused on creating a transformative, unified and comprehensive platform for styrenics recycling. SCS aims to develop the sustainability of styrenic polymers, including polystyrene (PS) and **expanded polystyrene (EPS)**, through innovative technologies and partner-driven solutions. SCS' members include **BASF, INEOS Styrolution, Synthos, Total, Trinseo and Versalis**.

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⁴ Directive 2018/851, recital 35.

⁵ SCS has submitted a statement in support of the pledging campaign. It presents a roadmap to unlock the unique and infinite capacity of PS for circularity by developing depolymerisation, dissolution and other innovative technologies at industrial scale.