APE Europe position note

For a sustainable management of used agri-plastics in Europe

General principles of the APE collection scheme

INTRODUCTION

Plasticulture in Europe is a key player in the agroecological transition and the circular economy. Agricultural plastics, with less than 2% of European plastic consumption, account for 60% of crop and livestock production. New forms of low-input and high-productivity agricultural production use more plastic to control crop parameters (temperature, hygrometry, light, irrigation, weeds, etc.), protects plants, crops, fodder. Reducing the environmental impact of agricultural production, it allows, for a small investment, an increase of the production in quality and quantity, while having less recourse to the products of synthesis.

Directly linked to the production process, increasing yield and quality, agri-plastics products\(^1\) cannot be considered as packaging.

However, in the absence of end-of-life management, agri-plastics have negative externalities after their useful life. In contact with soil and crops, they can be heavily soiled up\(^2\) to 3 to 4 times the weight of the new plastic put in the field. They represent large volumes that farmers cannot manage in good technical and economic conditions. In the absence of a specific scheme, this waste, which does not fall under the category of household waste, can be burned or buried, when it is not simply abandoned in nature, thus contributing to Marine Litter.

In the absence of a national collection and recovery scheme, less than 35% of agricultural plastics are properly managed at the end of their life, whereas countries that have set up a national system, more than 75% are correctly treated.

However, agricultural plastics are composed of homogeneous polymers (PE / PP), of good quality, in significant and regular quantities. Since they are not too dirty, they are highly appreciated by recyclers. Collected, plastic can then contribute to the circular economy by incorporating recycled plastics into new products.

European plastic producers (manufacturers, distributors and users) are engaged in an environmental approach to meet the objectives of the European Plastics Strategy: Zero waste to landfill in 2030. For this, plasticultors take individual and collective initiatives to improve waste reduction at source, collection, recycling and incorporation of recycled pellets into new products.

Essential for agricultural production, the absence of end-of-life management system strongly penalizes the agricultural sector. Nevertheless, proven, technical and economical solutions exist and they should be put in place wherever they are lacking. The purpose of the "General principles for sustainable end-

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\(^1\) Greenhouses, Tunnels, Mulching, Silage, Stretch, twine, net, irrigation pipes...

\(^2\) Used non-packaging ag-products are not contaminated by chemical
of-life management of agricultural plastics" is to provide guideline for the legislators and professionals who wish to improve end-of-life management of agricultural plastics in each country.

GENERAL PRINCIPLES

1) **A solution for farmers.** Often deprived of the management of used plastics, farmers who own the waste may resort to unspecified practices. It is therefore necessary to provide them with a system that is coherent and effective from a technical and economic point of view so that they can devote themselves to their first raison d'être: agricultural production.

2) **Extended Producer Responsibility (EPR).** The OECD, the European Union, and each country in Europe have incorporated the principle of extended producer responsibility which states that, where the holder is not able to process the waste in an appropriate manner, it is up to the producer (the product manufacturer) to contribute to end-of-life management. Agricultural plastics fall into this category and the manufacturer's responsibility in finding a solution for the farmer should be considered.

3) **A collective and shared governance between the economic actors.** However, the governance must be considered collectively between the farmer and all the economic actors who accompany, advise and supply him. This responsibility is not always well understood and should be explained. If it is necessary to advise and guide the farmer in the choices on the best solution for his production and to provide solutions for the end of life of marketed products. This responsibility must therefore be shared between the user who chooses and uses the plastic, whose cultural practices can durably affect the end of life of the products, the distributor who is closest to the concerns of his client, and the producer who designs and manufactures the product. It is then necessary to involve all economic actors in the end-of-life management by establishing a consent of each, leading to a shared governance.

4) **National coverage.** The proposed scheme covers the entire national territory, eventually split in parts when needed. The products, new or used, are intended to travel and it is important that every farmer, wherever he is located on the territory, can benefit from the services of the scheme.

5) **Product coverage.** In the same way, every product used in the production process must find a suitable solution for its end of life.

6) **Progressiveness in implementation.** The establishment of a national system can be long and difficult, the use of the principle of progressivity allows to deploy the device in phases before arriving at a comprehensive coverage (products or territorial).

7) **Equal treatment of actors.** The system put in place will ensure that the rules applied are common and identical for all professionals: manufacturers, distributors and users.

8) **Transparency and confidentiality.** Shared system, it associates all the actors to its management. Consequently, it is important that everyone has the same level of knowledge on the functioning and the results of the system put in place. Transparency will therefore be organized through meetings, studies, reports, within the structures set up and decisions will be taken in consultation. However, management may require the processing of individual data (e.g. quantities sold) which will have to be treated confidentially. The operation of the scheme is established in compliance with the of national and European competition rules.
1) **An industry initiative.** Among the possible schemes, there is one that has shown its technical and economic efficiency and that comes from a voluntary commitment of economic actors. They are best able to know the farmers’ expectations and provide them with answers. Actors themselves, they will ensure to consider the most accessible technical solutions and the minimal possible cost.

2) **Truth and costs internalisation.** End-of-life management of used products has a cost, most often hidden, or left to others when there is no collection system. In case of no solution the negative externalities of used agricultural plastics fall on the community: abandonment, pollution of soil or rivers, rehabilitation of wild dumps...

This assumes that economic actors have all the information, techniques and economics they need to make the right decisions. A pre-configuration study will meet this requirement of the same information provided to each.

The creation of collection schemes, especially voluntary, allows to know the real cost of the end of life and to optimize it, thanks to an improvement of the logistic flows, a reduction of the stain and thus of the volumes to be treated and a better valorisation from the recyclers.

The internalization of costs is based on two complementary contributions: the eco-contribution, which covers the costs of managing products that meet the recovery conditions, and the additional invoicing that finances the cleaning or burying of non-compliant products.

3) **The separation of responsibilities (finance and operations).** Steering (budget forecasts, R & D, etc.) and financial management must be separated from operational management in order to avoid confusion between payor and beneficiary likely to give rise to conflicts of interest. This separation allows a process of continuous improvement of the operator.

Given its mission of collective interest for the profession, the financial structure is open to all marketers, with independent governance of the respective market shares.

Operational management is entrusted to a dedicated organization, governed according to the principle of shared responsibility between the actors (marketers via the pilot structure, distributors and farmers). In view of its mission of public service provided by a private actor, the structure is non-profit, with the mission of organizing the operations of collection, recovery and valorisation, in close contractual collaboration with the pilot structure, in particular concerning control of operational costs.

The relations between the contributing companies and the financial structure are the subject of a framework contract defining the obligations of each of the parties.

The relationship with the public authorities can be ensured by a framework contract, defining the scheme and its evaluation criteria.

4) **Continuous improvement.** The system follows a principle of progressivity and continuous improvement of the main parameters: number of contributors and products, volumes collected, creation of collection programs, quality of the collected products, treatment and financing.
1) **Product design**
Manufacturers and Collection Schemes ensure that only recyclable or biodegradable products enter on the market. Integrated lifecycle management is available for all through standards.  

2) **Preparation, Collection, Recovery & Processing**
Shared responsibility implies that each actor intervenes in the operational functioning of the scheme. This principle allows a better technical and economic efficiency.  
- Farmers buy contributing and recyclable products, prepare the waste after use according to the minimum technical requirements (MTR) and make them available to the organization or company in charge of their recovery.  
- The distributors ensure the communication and training on collection and operations. They can also carry out grouping centers and control operations, if applicable.  
- The manufacturer, through service providers, ensure the recovery and processing of used products.  

3) **Research and development**
In order to guarantee the sustainability of the collection schemes, a continuous effort of research and development projects is needed, the aim is to ensure waste reduction at source (RAFU, biodegradable...) and waste's quality improvement, easing collection and recycling process for a better integration.  
Depending on the project, they may be supported by the financial and / or operational structures.  

4) **Monitoring and certification**
Collection of used plastics is checked by a monitoring system and external audits. Certification of recycled material is provided by recyclers to the converters incorporating it in new products.

**RECOMMENDATIONS**

1) **Individual commitment**
Collection systems can only work thanks to the individual commitment of each:  
- Manufacturers providing end-of-life management solutions for marketed products.  
- Distributors who support their customers in the implementation of adapted management solutions.  
- Farmers who contribute to the efficiency of the scheme through their decisions and preparations.  

2) **Collective commitment**
The management of used agricultural plastics is part of the Corporate Social Responsibility. This commitment, individual, is also collective to allow optimization of methods and costs.  
In order to highlight this responsible environmental commitment, a Plasticulture Alliance will be proposed to stakeholders in the schemes. This Charter highlights the contribution of stakeholders to environmentally responsible agriculture through the use of plastics and the circular economy by the recycling of plastics and their incorporation into new products.  

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3 CEN TC 249 / WG 26 has been set up to elaborate a standard for agri-plastics lifecycle management  
4 National minimal technical references are provided to all  
5 RAFU: soilage content reduction during removing operations on field