



Fair Resource Foundation - Call for Evidence - Evaluation of the Single-Use Plastics Directive (EU) 2019/904

Fair Resource Foundation welcomes the European Commission's evaluation of the Single Use Plastics Directive (SUPD). We fully support its core objectives: preventing and reducing the impact of certain plastic products on the (marine) environment and on human health, promoting the transition to a circular economy by encouraging innovative and sustainable business models, products and materials, and improving the functioning of the internal market by setting common rules across the EU.

The evaluation of the Single-Use Plastics Directive (SUPD) presents a critical opportunity to enhance clarity and set a standard across EU member states by establishing more precise guidelines and strengthening other EU legislation (WFD, PPWR).

For implementing Article 4's reduction measures for instance: currently, the ambiguity in the directive allows for inconsistent national interpretations, leading to fragmented progress in reducing single-use plastics. To address this, the revised SUPD could provide **standardized criteria** for what constitutes effective reduction measures, including mandatory reuse systems, product bans, or consumption limits. These criteria should be evidence-based, scalable, and tailored to different sectors - such as packaging, food service, and retail - while ensuring alignment with the (upcoming) EU's circular economy goals. By defining clear benchmarks and timelines, member states can adopt cohesive strategies that minimize regulatory disparities and maximize environmental impact.

The Netherlands has advanced SUPD goals by implementing a mandatory reuse system for dine-in consumption in the HoReCa sector (since 2024), requiring reusable cups/containers. Collection targets are set at 75% for recyclable items by 2024, rising to 90% by 2027, with a 40% reduction in single-use plastics targeted by 2026 (vs 2022). While progress is evident, enforcement and compliance - especially for large chains - remain works in progress.

The Netherlands offers a compelling model for such standardization through its **mandatory reuse system for dine-in consumption in the HoReCa sector**. This system, which requires reusable tableware for consumption on-site, demonstrates how targeted, sector-specific measures can significantly reduce single-use plastic waste while fostering industry compliance. The revised SUPD should encourage member states to adopt similar **binding reuse mandates** for high-impact sectors, supported by EU-wide guidelines on implementation, monitoring, and enforcement. By embedding these clarifications, the SUPD can drive more effective and uniform action across Europe.

Besides, the SUPD is fully consistent with the EU Plastics Strategy, Zero Pollution Action Plan, and Packaging and Packaging Waste Regulation, we urge the EU to address **plastic toxicity** in the revised Single-Use Plastics Directive. Current laws focus on reducing plastic waste but overlook the dangers of toxic additives in European plastic products.



We also call for a pollution prevention principle in the upcoming Marine Strategy Framework Directive to better protect marine ecosystems.

The SUPD must better align with waste prevention and reuse to reflect the EU's evolving policy framework. Currently, Extended Producer Responsibility (EPR) under the SUPD focuses mainly on financing waste management, clean-up, and awareness, thus overlooking the root causes of single-use plastic consumption.

To align with the Packaging and Packaging Waste Regulation, EPR schemes should prioritize **waste reduction, prevention, and reusable alternatives**. PPWR Articles 43 and 51(3) already require EPR schemes to fund prevention measures and allocate budgets for reuse. Applying this approach to the SUPD would strengthen policy coherence, reinforce the waste hierarchy, and tackle single-use plastics at the source.

Suggestions regarding future product bans

- *Plastic lids (e.g. for coffee, milkshakes)*
- *Plastic snack containers (e.g. frikandel containers, tapas containers, etc.)*
- *Small plastic sweet wrappers (Chupa Chups, Maoam, Look o Look, etc.)*
- *Plastic sweet wrappers (e.g. Mars)*
- *Plastic lollipop sticks*
- *Plastic ice cream wrappers and cups (e.g. from Sundae)*
- *Plastic sweet toys (e.g. treasure chests, whistles – half sweet, half plastic)*
- *Plastic sauce sachets (already replacing tubs, but leading to an increase in litter)*
- *Plastic bread clips*
- *Plastic tubes for pre-rolled joints*
- *Plastic bags for takeaway sandwiches/snacks*
- *Plastic tissue packs (for 10 tissues)*
- *Plastic straw wrappers*
- *Plastic petrol station gloves (good example: Esso has stopped using them)*
- *Plastic cannabis bags*
- *Plastic dog waste bags*
- *Plastic toothpicks (common in car parks and toilets)*
- *Plastic hair ties (often found near shared scooters)*
- *Plastic shirt bags*
- *Plastic confetti*
- *Plastic cigarette wrappers*
- *Cigarette filters (a ban is already being introduced in California)*
- *Pouches*
- *Water balloons*
- *Disposable lighters*
- *Anglers' worm tubs made of XPS/EPS*
- *Plastic in chewing gum*
- *Plastic in F1 fireworks (e.g. crackling balls)*
 - *NB: if the number of professional fireworks displays increases, also look at the plastic specifically released during these events (F3)*



Product	Measures	Reasons
<i>Cigarette filters (plastic)</i>	<i>Ban on product</i>	<i>#1 Litter - high quantities; unnecessary product</i>
<i>Drink pouches, drink cartons</i>	<i>Ban on product</i>	<i>Frequently found in litter; non-circular packaging</i>
<i>Fast food / to-go - disposable packaging (cups, bags, boxes, sauce cups, straws, wraps, trays, cutlery)</i>	<i>Ban on disposable packaging and products</i>	<i>Frequently found in litter; promote reusable/returnable options</i>
<i>Candy wrappers / products</i>	<i>Ban on unnecessary candy wrappers / products</i>	<i>Replace non-circular packaging/plastic with biodegradable materials where possible; frequently found in litter</i>
<i>Disposable lighters</i>	<i>Ban on product</i>	<i>Frequently found in litter (including rivers); more sustainable alternatives exist</i>
<i>Disposable vapes</i>	<i>Ban on product</i>	<i>Regularly found in litter; hazardous product (fire risk)</i>
<i>Plastic in/around cigarette boxes</i>	<i>Ban on plastic use for this application</i>	<i>Frequently found in litter</i>
<i>Plastic joint packaging</i>	<i>Ban on plastic use for this application</i>	<i>Regularly found in litter</i>
<i>Plastic weed bags</i>	<i>Ban on plastic use for this application</i>	<i>Regularly found in litter</i>
<i>Nitrous oxide balloons</i>	<i>Ban???</i>	<i>Regularly found in litter</i>



<i>Releasing balloons</i>	<i>Ban on releasing</i>	<i>Uniform regulation across the Netherlands</i>
<i>Plastic bread bags</i>	<i>Ban on plastic use for this application</i>	<i>Regularly found in litter; more sustainable alternatives exist</i>
<i>Plastic packaging around paper tissues</i>	<i>Ban on plastic use for this application</i>	<i>Regularly found in litter</i>
<i>Plastic dog waste bags</i>	<i>Ban on plastic use for this application</i>	<i>Regularly found in litter/street drains; biodegradable alternatives exist</i>
<i>Plastic in fireworks</i>	<i>Ban on plastic use for this application</i>	<i>Regularly found in litter</i>
<i>Plastic confetti</i>	<i>Ban on product</i>	<i>Regularly found in litter; difficult to clean up; biodegradable alternatives exist</i>
<i>Styrofoam</i>	<i>Ban on styrofoam use if a more sustainable alternative exists (e.g., cardboard as filler)</i>	<i>#1 Litter in rivers; often more sustainable alternatives exist</i>
<i>Plastic-packaged fishing items (bait packaging, fishing gear packaging)</i>	<i>Ban on disposable plastic for this application if a more sustainable alternative exists</i>	<i>Frequently found near rivers</i>
<i>Wet wipes with plastic</i>	<i>Ban on plastic for this application</i>	<i>Frequently found in rivers; more sustainable alternatives exist</i>
<i>Plastic shotgun cartridges</i>	<i>Ban on product</i>	<i>Frequently found in rivers; more sustainable alternatives exist</i>
<i>Plastic coffee cups</i>	<i>Ban on product</i>	<i>Regularly found in rivers; more sustainable alternatives exist</i>



<i>Disposable barbecues</i>	<i>Ban on product</i>	<i>Regularly found in recreational areas/beaches; more sustainable alternatives exist</i>
<i>Chewing gum</i>	-	<i>Frequently found on streets; expensive to remove</i>
<i>Construction waste (specify)</i>	-	-

About Fair Resource Foundation

Fair Resource Foundation is a non-profit organisation dedicated to advancing circular economy principles and ensuring equitable access to resources across the EU, with a specific focus on the Netherlands and Belgium. We advocate for systemic change in resource management, focusing on reducing waste, promoting reuse, and fostering sustainable production and consumption patterns. We collaborate with policymakers, businesses, and civil society to develop and implement ambitious EU policies that address resource depletion, environmental degradation, and social inequality.

By bringing together experts, researchers, and civil society we work to create a future where resources are used responsibly, waste is minimized, and economic activities align with planetary boundaries.