

Evaluation of the Single-Use Plastics Directive (EU) 2019/904

Fields marked with * are mandatory.

Introduction

The European Commission is carrying out an evaluation of [Directive \(EU\) 2019/904](#) on the reduction of the impact of certain plastic products on the environment (the Single-Use Plastics Directive SUPD – it also covers fishery items).

The Directive aims to:

- prevent and reduce the impact of certain plastic products on the (marine) environment and on human health;
- promote the transition to a circular economy by encouraging innovative and sustainable business models, products and materials;
- improve the functioning of the internal market by setting common rules across the EU.

Measures introduced by the Directive include restrictions on placing on the market (bans), the obligation to introduce consumption reduction measures for beverage cups and food containers, the requirement for plastic caps to remain attached to beverage containers, targets on recycled content and separate collection of beverage bottles, marking requirements (the ‘turtle logo’), provisions on extended producer responsibility as well as awareness raising measures.

This public consultation is part of the evaluation process required under Article 15 of the Directive. The purpose of the consultation is to:

- Gather views and experiences from citizens, businesses, NGOs, authorities, and other stakeholders.
- Assess how the Directive has worked in practice, including its effectiveness, efficiency, relevance, coherence with other policies, and EU added value.
- Collect evidence and opinions on whether the current measures are sufficient to achieve its objectives and where improvements may be needed.

The questionnaire is open to all members of the public and organisations. Completing the questionnaire should

take around 15-20 minutes. Your contribution will help the European Commission assess the Directive's impact.

About you

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* I am giving my contribution as

- Academic/research institution

- Business association
- Company/business
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

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Sofie

*** Surname**

Van Canegem

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svc@naturvernforbundet.no

*** Organisation name**

255 character(s) maximum

Naturvernforbundet

*** Organisation size**

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

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Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making.

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Please add your country of origin, or that of your organisation.

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Section B. General questions (awareness, behaviour & perceived results)

Awareness & perceptions

The SUPD aims to reduce the environmental impact of plastic waste by introducing different measures for different types of single-use plastic products (SUP) and for fishing gear containing plastic. These include banning or restricting the most common single-use plastic items, promoting alternatives, and requiring producers to take greater responsibility for waste management.

1) Before this survey, were you aware of the EU rules on single-use plastics and fishing gear containing plastic?

- Yes
- No
- Not sure

2) Since 2019, have you noticed changes in the availability of SUP products, e.g. straws, cutlery, cups, food containers, tobacco filters, beverage stirrers?

- Yes
- No
- Not sure

If "Yes", please specify:

- Cotton bud sticks
- Cutlery, plates, straws and beverage stirrers
- Balloons and sticks for balloons
- Food containers
- Cups for beverages
- Beverage containers
- Tobacco filters
- Plastic bags
- Packets and wrappers
- Wet wipes and sanitary items
- Other

3) How do you perceive the level of single-use plastic litter in your area compared to the level of single-use plastic litter in 2019?

- Decreased
- No change
- Increased
- Don't know

4) Which of the items covered by the SUPD do you still most often encounter as litter? (choose up to 3).

Between 1 and 3 selections

- Cotton bud sticks
- Cutlery
- Plates
- Straws
- Stirrers
- Balloons
- Balloon sticks
- Food containers
- Cups for beverages
- Beverage containers
- Tobacco filters
- Plastic bags
- Packets and wrappers
- Wet wipes
- Sanitary items
- Other

If "Other", please specify:

Rope and fishing gear.

It should be noted that Norway is one of the countries where nicotine pouches are widely used. Together with tobacco filters, these products are among the most commonly found litter items in clean-up activities.

5) Since 2019, have you noticed practical differences between banned SUP items (cotton bud sticks, cutlery, plates, straws, beverage stirrers, balloon sticks, EPS food and beverage containers and EPS cups for beverages) and their alternatives, e.g. plastic straws vs paper straws?

- Yes
- No
- Not sure

6) Are there any unintended effects that you have observed, for example substitution by less sustainable alternatives (e.g. PFAS-coated papers), false green claims (e.g.

false reusability/biodegradability claims), increased consumption of alternative items (e.g. paper-based takeaway boxes) etc.?

A notable challenge is the substitution effect. SUP products are often replaced by products made from other materials such as paper or wood. In many cases these products still contain plastic coatings or layers, or are treated with chemicals such as PFAS. A typical example is cardboard cups, which often include a plastic lining and cannot be recycled as paper. In our clean-ups, we observe a reduction in SUP products, but at the same time an increase in similar products made from alternative materials.

In addition, misleading environmental claims are sometimes used in marketing, with products such as cups, plates and cutlery labelled simply as “paper” despite containing plastic. Furthermore, these products can create additional waste management challenges, as they cannot be recycled with paper waste and must be treated as residual waste.

Another often observed false green claim problem is biodegradable plastic. Recent scientific research shows that biodegradable plastics do not decompose in natural environments within a timeframe that prevents environmental harm. In practice, their environmental impacts closely resemble those of conventional plastics. Moreover, biodegradability claims may encourage littering, as consumers are often unaware that these materials typically degrade only under industrial conditions. This is an outcome that must be avoided.

Additionally, it must be noted that the turtle marking on transparent plastic cups is very hard to read and can be ineffective for that reason.

Effectiveness & behaviour

For single-use plastic products and fishing gear containing plastic, the effectiveness of the Directive means whether it has actually reduced the consumption and littering of single-use plastics, improved waste management, and prevented marine pollution.

7) Have tethered caps to beverage bottles affected the ways you use them and/or sort them as waste?

- Yes
- No
- Don't know

8) Are you aware of the “turtle label” or awareness campaigns related to SUP items?

- Yes
- No
- Not sure

If "Yes", has the turtle label introduced by the SUPD for products (i.e. sanitary towels /tampons/applicators, wet wipes (personal/domestic), tobacco filters, cups) or awareness campaigns influenced your behaviour?

- Yes, significantly
- Yes, somewhat
- No
- Don't know

9) Are re-use options (refill/return, deposit-return schemes) for relevant products covered by the SUPD (such as cups for beverages, food containers, beverage containers (including bottles), plates, cutlery) becoming available where you live?

- Yes widely
- Yes somewhat
- No
- Don't know

10) The SUPD bans the following SUP products: cotton bud sticks, cutlery, plates, straws, beverage stirrers, balloon sticks, EPS (expanded polystyrene) food and beverage containers and EPS cups for beverages. Have you seen such products available in online marketplaces and traditional retail stores in your EU country?

- Yes, often
- Yes, sometimes
- No
- Don't know

11) The SUPD required EU countries to introduce the following measures for fishing gear containing plastics: extended producer responsibility, national minimum annual collection rates for waste fishing gear for recycling, reporting obligations, and awareness raising measures to inform users about the availability of reusable alternatives, reuse systems and waste management options as well as about the negative impact of littering. In your view, have these measures been effective?

- Yes significantly
- Yes somewhat
-

No

Don't know

Please explain which measures are not effective and why

It is too early to assess the effect of this measure, as the obligation to collect only applies from 01.03.2027. Similarly, the effects of extended producer responsibility are too early to evaluate, as the requirements only apply from 01.01.2026.

Nevertheless, we are positive and hopeful that the measures introduced in the SUPD will have a positive impact, and we look forward to seeing how they perform once fully implemented in practice.

Fishing gear and aquaculture equipment represent an important source of marine litter. In addition to lost or discarded gear, there also acute local pollution from damaged or abandoned gear can occur. Prevention should be strengthened. The legislation should also include:

- Mandatory marking of fishing gear with unique identification*
- A prohibition on the use of unmarked gear
- Set binding quantitative collection targets
- Prioritize prevention through durability and repairability requirements and support for monitoring technologies
- Producers should be required to provide instructions on the safe use of fishing gear, clear information on the prohibition of leaving equipment in nature, and guidance on where to report lost gear

*A mandatory and operational marking system for fishing gear is currently missing. The Directive refers to tagging requirements in Article 8 of Regulation (EC) No 1224/2009, which in turn refers to Article 119 (committee procedure), which then refers to Decision 1999/468/EC, which has been repealed. This chain of cross-references creates a bureaucratic dead end, resulting in a provision without concrete technical standards, protocols or binding obligations for individual marking.

Without mandatory marking and robust traceability, producers responsible for abandoned, lost or discarded gear cannot be identified. This makes both cost recovery and the attribution of responsibility unworkable. Establishing a clear, mandatory and functional marking system is therefore essential for EPR schemes to function effectively in this sector. Lost or abandoned fishing gear is namely one of the major biological impacts of marine littering. It is thus of the highest importance to find applicable solutions against this.

12) What has worked best so far in reducing the negative impacts of single-use plastics and fishing gear containing plastics?

The bans have generally proven effective. These measures have contributed to a visible reduction of several single-use plastic products in the environment.

Article 6.1 on tethered caps for plastic beverage bottles has been particularly effective, as fewer loose bottle caps are now being found on beaches and in urban environments.

Article 9 on the separate collection of beverage bottles has likewise delivered positive results, with many Member States establishing deposit return systems (DRS) to increase collection rates. Norway already had a DRS in place with high return rate, and has taken up a guiding roll for States with new DRS. As a result, the

Directive has had limited additional impact in Norway in this specific area, but it has contributed to the wider adoption of similar systems across Europe. A network, EDRSA, has been founded where best-practices can be shared.

Article 7 on product marking appears to have had some effect in raising consumer awareness of littering.

Finally, national consumption reduction targets have proven effective where they are supported by dedicated action plans, as demonstrated in countries such as Ireland, France and Portugal.

Section C. In-depth questions related to SUP products (relevance, scope, market effects & implementation)

Relevance

The Directive is considered relevant if it responds to environmental concerns, public health issues, and citizens' expectations.

13) Please complete the following statement: "Tackling single-use plastic products in the EU is...":

- Very important
- Important
- Neutral
- Less important
- Not important

14) The SUPD introduces different types of measures: consumption reduction, restrictions on placing on the market, tethered caps for beverage containers, recycled content, marking, extended producer responsibility (EPR), separate collection, and awareness raising. How appropriate are these types, including regarding their level of ambition?

- Very appropriate
- Somewhat appropriate
- Not appropriate
- Don't know

15) The Directive currently covers the following SUP products: cotton bud sticks, cutlery, plates, straws, beverage stirrers, balloons, balloon sticks, food containers,

cups for beverages, beverage containers (including beverage bottles), tobacco filters, plastic bags, packets and wrappers, wet wipes, and sanitary items (see Part A–G of the Annex to the Directive). In your view, the current scope for the SUP products is:

- Sufficient
- Not sufficient
- Don't know

If "Not sufficient", please explain why.

As mentioned above, SUP products are often replaced by products made from other materials, such as wood or paper. In our clean-ups, we observe a reduction in SUP products, but also a rise in similar products made from alternative materials.

Furthermore, since the adoption of the Directive, several new or increasingly widespread SUP items have emerged. As they increasingly are observed in the environment, a ban on following products should be included:

- disposable electronic cigarettes (vapes)
- synthetic reinforcement fibres
- plastic detonation cords, plastic strapping bands, trimmer lines
- low quality rope used in maritime settings. In Norway, aquaculture operations have been observed using small rope segments as single-use items as they are cut, used briefly, and then discarded. Consequently, significant amounts enter the sea instead of being reused. This practice must be prohibited by banning low quality ropes in maritime settings. Additionally, disposable fishing equipment, such as dolly ropes or gear of such poor quality that loss during normal use is likely, should be banned.

Also following areas need to be further addressed:

- Wet wipes: Despite existing marking requirements and EPR schemes, wet wipes remain a significant source of pollution, particularly through wastewater systems and marine environments. Additional regulatory action is therefore required.
- Polystyrene: expanded polystyrene (EPS) packaging and fragments remain a prominent component of marine litter across Europe. These materials easily break down into smaller pieces and are difficult to collect once released into the environment. The same goes for extruded polystyrene (XPS).
- Tobacco products: Cigarette filters, which contain plastic fibres, remain among the most frequently found litter items in Europe. In Norway, nicotine pouches are also widely used and commonly found during litter clean-ups. Introducing a ban on both cigarette filters and nicotine pouches would address a major avoidable pollution source. Since filters offer no proven health benefits*, there is little justification for maintaining them. The restriction should apply regardless of material composition.
- As mentioned earlier, article 6.1 on tethered caps for plastic beverage bottles has been effective. However, citizen science data from clean-ups in Norway over the last five years show that locks, corks and caps remain among the top ten most frequently found litter items. Accounting for 3 percent of recorded litter, they rank as the ninth most common item. Additionally, they were found in 41 percent of clean-up events. Admittedly, not all of these items necessarily originate from the period following implementation of the SUPD. However, importantly, these caps and locks originate not only from beverage bottles but also from other types of packaging. Caps should therefore be attached to additional product categories.

*Source: Pauly JL, Mepani AB, Lesses JD, et al Cigarettes with defective filters marketed for 40 years: what Philip Morris never told smokers Tobacco Control 2002;11:i51-i61.

EU added value

EU added value refers to the benefits of taking action at the EU level rather than national level, which helps ensure consistent rules across all Member States.

16) Can Member States individually tackle single-use plastic items better than the EU?

- Yes
- No
- Not sure

If "Yes" or "No", please explain why.

To support a well-functioning internal market, it is important that the rules apply across the EU. This helps create a level playing field.

In addition, litter does not respect national borders. Once items enter the natural environment, they can easily move between countries through waterways and marine currents. Therefore, a coordinated EU-wide approach is necessary.

17) To what extent do you think common EU rules on single-use plastics create a level playing field for businesses across Member States?

- To a large extent
- To a medium extent
- Not at all
- Not sure

Coherence

Coherence is assessed by judging how well the SUPD's objectives, definitions, instruments and timelines align with the referenced frameworks, and whether implementation is consistent across countries and contexts. Consider overlaps, synergies, gaps or contradictions and briefly note concrete examples or where divergence occurs.

18) Is the SUPD coherent with other EU policies (packaging, waste, Marine Strategy, tobacco control)?

- Very
- Somewhat

- No
- Not sure

19) Is the SUPD coherent with international efforts (Regional Seas conventions, Framework Convention on Tobacco Control, etc.):

- Yes
- Somewhat
- No
- Not sure

Scope & definitions

The evaluation of the SUPD is looking at whether the current definitions used in the Directive are clear and workable. In particular, the definitions of ‘plastic’[1], and ‘single-use plastic product’[2] may affect how the rules are applied in practice across different sectors and countries.

[1] A material consisting of a polymer as defined in point 5 of Article 3 of Regulation (EC) No 1907/2006, to which additives or other substances may have been added, and which can function as a main structural component of final products, with the exception of natural polymers that have not been chemically modified.

[2] A product that is made wholly or partly from plastic and that is not conceived, designed or placed on the market to accomplish, within its life span, multiple trips or rotations by being returned to a producer for refill or re-used for the same purpose for which it was conceived.

20) Have the definitions of “plastic” and “single-use plastic product” created practical difficulties for you or your sector?

- Yes
- No
- Not sure

21) Are the definitions of “plastic” and “single-use plastic product” clear and appropriate?

- Yes
- No
- Not sure

22) Following the Directive, cotton bud sticks and straws are exempt when used as medical devices. In your view, are the current exemptions for medical devices:

- Appropriate
- Not appropriate
- Not sure

If "Not appropriate", please explain why not.

It is appropriate to allow exemptions for products when they are used as medical devices, where single-use items may be necessary for hygiene and patient safety. However, such exemptions should be limited to cases where single-use plastics are clearly necessary. This is an important nuance.

Where suitable alternatives exist or where the use of single-use products is not essential for medical purposes, exemptions should not apply. This would ensure that unnecessary plastic consumption is avoided while maintaining high standards for healthcare and patient safety.

Market & competitiveness

The evaluation seeks to understand how the SUPD has affected businesses and markets. The following questions look at different aspects of competitiveness.

23) Your role (tick any):

- Producer
- Import/export
- Seller
- Hospitality/Food service (HORECA)
- Waste management/Recycling
- Fishing gear
- Other

26) In your view, how has the SUPD impacted competitiveness in EU markets?

- Positively
- Neutral
- Negatively

Please explain why.

The SUPD has contributed to creating a level playing field in the EU, as all Member States are subject to the same requirements.

27) In your view, how has the SUPD impacted competitiveness in international markets?

- Positively
- Neutral
- Negatively

Please explain why.

Considering that plastics used for single-use packaging are largely imported, reducing their use and moving towards reuse systems can strengthen economic resilience. By relying less on (virgin) materials and extending the lifespan of resources through reuse, the economy becomes less dependent on external supply chains.

28) If you are an operator based in a third country: how has the SUPD impacted your activities?

- Positively
- Neutral
- Negatively

Please explain why.

29) Have there been any effects on trade for SUP products or alternatives (exports /imports, sourcing, lead times)?

Yes. The promotion of alternatives to SUP products to a wider public and through a larger number of distributors has also stimulated innovation, encouraging companies to develop new alternatives and solutions.

30) How has the recycled content requirement for beverage bottles (25% by 2025 for PET bottles; 30% by 2030 for all SUP beverage bottles) affected your operations?

The SUPD has not significantly affected the level of recycled content in beverage bottles in Norway. The use of recycled material in PET bottles was already high and exceeded the 2025 target. Therefore, the Directive did not have a notable additional effect in Norway in this regard. Additionally, the packaging-related recycled plastic targets should be removed from the SUPD, as they are addressed in the PPWR with a safeguard clause.

In general, implementation challenges remain. Some industry actors are advocating for accounting methods, such as mass balance approaches. This allows very small amounts of recycled plastic to count as recycled content, undermining the intention of the legislation and exemplifying an unjust green claim. Robust methods are therefore necessary to ensure that recycled content requirements deliver real environmental benefits. Additionally, for targets to be meaningful, financial penalties for non-compliance should be introduced.

Costs

The evaluation also considers the costs linked to implementing the SUPD. You are invited to share any experiences with different types of costs, how manageable these have been in practice, and whether they have been passed on to customers.

32) Have you faced any costs because of (tick any):

- Product redesign
- Equipment/process changes
- Admin & reporting
- Staff training
- Other
- None
- Prefer not to say

33) How manageable have compliance costs been?

- Very manageable
- Manageable
- Neutral
- Difficult
- Very difficult
- Prefer not to say

34) Are costs passed through to customers:

- None
- Partial
- Full
- Not applicable
- Prefer not to say

Implementation & enforcement

Please answer based on your practical experience since the SUPD was implemented in your country/region /municipality. Consider both implementation (transposition, guidance, infrastructure) and enforcement (monitoring, inspections, penalties, compliance).

35) How do you assess the SUPD implementation overall in your country/region /municipality (enforcement, compliance):

- Well
- Moderately
- Poorly
- Don't know

Please explain why.

This answer must be nuanced. The rules on fishing gear are not yet fully implemented. Therefore, their effects cannot yet be assessed. It will be necessary to evaluate this once the rules and measures are fully operational.

36) What have been the obstacles to the SUPD implementation?

The wording "first put on the market" complicates enforcement and monitoring. In practice, this creates loopholes, particularly in regions bordering non-EU countries. Prohibited SUP products can be purchased outside the EU and subsequently used in shops within EU Member States. This is especially a problem in Ireland.

In Norway in particular, prohibited products have been observed at street food festivals, where individuals, often volunteers operating food stands to raise money for a specific cause, have sold food using SUP products that are no longer permitted.

These examples illustrate the importance of clearer definitions and improved enforcement mechanisms.

In general, monitoring and reporting have been challenging. Furthermore, Member States should be required to report the quantities of banned items to the EU in order to enable the monitoring of developments over time. National statistics should also be made easily accessible through the respective national statistical offices (for Norway, Statistics Norway (SSB)). This would increase transparency, which is currently lacking. Improved availability of data would increase transparency and facilitate more effective policy evaluation.

In addition, enforcement tools are limited for certain measures, particularly those related to awareness-raising and consumption reduction. Another challenge is the defensive attitude from parts of the business sector regarding the implementation of product bans, extended producer responsibility schemes, and product design requirements.

Extended producer responsibility schemes have the potential to play a central role in addressing plastic pollution. However, these systems should place a stronger emphasis on prevention and reduction, rather than focusing primarily on clean-up and waste treatment costs.

More harmonised monitoring indicators, clearer definitions and guidelines, coordinated litter monitoring and stronger enforcement tools would also help reduce disparities between Member States, as well as follow up Member States practices. Citizen reporting should also be enabled.

37) How enforceable have the SUPD requirements been? Please explain why when ticking an answer

- Easy to enforce
- Moderately easy
- Difficult
- Don't know

Please explain why.

39) Are current reporting obligations (Article 13) fit for purpose, i.e. provide enough information to fulfil their purpose?

- Yes
- No
- Not sure

Open feedback

40) Do you have any suggestions on how to simplify aspects of the SUPD that might appear overly complex without undermining its objectives?

We do not see any strong need to simplify the Directive, which already focuses on the ten most commonly found litter items and includes a limited set of main measures. As such, it is not overly complex in its current form.

Furthermore, some measures have not yet been fully implemented, and their effects should be evaluated before considering any major adjustments.

There may, however, be room for simplification in certain areas. Reporting could be streamlined through digitalisation and reduced administrative paperwork. In addition, setting an EU-level consumption reduction target could simplify the current fragmentation of national measures addressing consumption reduction.

Contact

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