We support the proposal to make EPR mandatory for plastic products and to harmonize it across countries based on criteria defined in Annex D.

EPR schemes are an expression of the polluter pays principle, it is a policy tool, not a principle. Therefore, EPR schemes should be mandatory rather than voluntary.

Also, we see that EPR should consider having government representatives and oversight in their governing bodies, as well as key stakeholders including waste pickers, recycling and reuse operators, environmental and civil society organizations, and municipalities, and make their decisions and data transparent.

We think that EPR should strengthen by having eco-modulation amounts high enough to be effective and covering the full cost of plastic waste management, including the management of residual waste fractions, rather than focusing only on recycling streams.