

# ASSESSMENT REPORT

# SUSTAINABLE ALTERNATIVES TO DISPOSABLE PLASTICS IN UKRAINE



**The review was prepared by the NGO "Chemical Safety Agency" (CSA) within the framework of the project "Addressing the worsening plastic crisis in five countries of Eastern Europe, Caucasus and Central Asia (EECCA)"**

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## INTRODUCTION

One of the primary contributors to global plastic pollution is the ongoing prevalence of single-use plastics in our daily lives, such as water bottles, cups, plates, cutlery, straws, stir sticks, food containers, plastic bags, and plastic packaging.

While single-use plastic products offer convenience, they impose significant costs on society due to the environmental damage and health threats resulting from their production, distribution, and waste generation.

One of the biggest challenges in managing plastic waste is its disposal. As the majority of plastic waste consists of single-use plastic, there is a significant issue with its safe recycling and disposal. This often yields negative results, and the accumulation of plastic in the environment contributes to global pollution.

Consequently, it is crucial to recognize that single-use plastics should be eliminated from circulation as swiftly as possible. The following are the principal reasons for transitioning away from plastics and adopting alternatives:

- An ever-increasing amount of plastic waste, including single-use plastics that are non-biodegradable and take hundreds of years to decompose, remain in landfills for decades, polluting the environment and jeopardizing both environmental and human health.
- Open burning of plastic waste often releases toxic substances, including dioxins, into the atmosphere.
- The formation of microplastics refers to any plastic fragments measuring less than 5 mm in length, which adversely affect the environment and human health. Microplastics enter ecosystems from various sources, including the breakdown of floating plastic debris in global oceans. They also form when synthetic fabric clothing is washed and when automobile tires wear down. Additionally, microplastics are found in urban dust, result from the degradation of road markings, and originate from the breakdown of marine paint. Furthermore, primary microplastics are found in cosmetics and personal care products. These microplastics can accumulate in both the human body and marine life through the consumption of seafood contaminated with microplastics.
- Plastic pollution poses a significant threat to aquatic systems and damages aquatic life.
- Plastic waste not only pollutes landscapes but also poses a serious health risk to both people and the environment.

Reducing the plastic burden on the environment and society appears to be primarily through a shift to alternatives to single-use plastic.

Their support and promotion should shift public attitudes towards plastic products, fostering the belief that safe alternatives to certain plastic items are vital for efforts to decrease plastic waste and help reduce the use of virgin plastics through a comprehensive ban on hazardous chemicals within them.

The report examines key factors that influence opportunities for countries to reduce the production, export, import, and use of single-use plastics, considering the sectors involved and the availability of safe alternatives.

1. The review of the existing national legislation on the regulation of the production, import, export, and use of single-use plastic products has revealed that, to date, Ukraine does not have specific national legislation addressing single-use plastic products. As a result, their management is governed by the provisions of laws that primarily pertain to plastic products and their waste. Currently, the country is preparing a draft law, the adoption of which will facilitate the implementation of Directive (EU) 2019/904 on single-use plastics into national legislation, gradually limiting the circulation of single-use plastic products in Ukraine.
2. The Overview of existing types of single-use plastics, including applications and types of polymers used, shows that the definition of single-use plastic articles in the forthcoming national draft law is fully consistent with the definition of single-use plastic articles provided in Directive (EU) 2019/904 (Article 3(2)).

This bill also includes a ban on the manufacture, importation, introduction into circulation, and distribution of the following products.:

- hygienic cotton swabs with a plastic base;
- Styrofoam containers and plastic containers in the form of blister packs or trays for ready-to-eat food products that are consumed on site or taken to go;
- stirrers and drinking straws;
- sticks attached to balloons;
- skewers;
- disposable forks, knives, spoons, plates, etc.

This list of single-use plastic products, as outlined in the draft law prepared for discussion and consideration, aligns with the list of single-use plastic products whose placement on the EU market is restricted and effectively prohibited (Article 5 of Directive (EU) 2019/904), as detailed in Part B of the Annex to that Directive.

According to the Ukrainian classification, disposable plastic products fall under the "Non-food" class, which is further divided into suitable complexes, subclasses, and groups. Disposable plastic goods are in high demand and are widely used in Ukraine.

The primary consumers of single-use plastic products across different sectors of production and consumption in Ukraine are categorized as follows:

- B2B (Business-to-Business)
- B2G (Business-to-government)
- B2C (Business-to-Consumer)

The overview of the types of single-use plastics most commonly used in Ukraine presents the findings of a survey conducted as part of the program.

The "European Union for the Environment" (EU4Environment) is featured in the Analytical Report on Prioritization of Sustainable Public Procurement and Market Readiness Analysis in Ukraine.

A study revealed that 164 respondents—participants in public procurement, including customers, suppliers, contractors, representatives of national expert organizations, institutes, and other stakeholders—identify the most commonly purchased items among single-use plastic products as follows:

- disposable plastic bags and garbage bags;
- Plastic products (this may include single-use plastic);
- Disposable utensils and plates;
- disposable tableware for catering companies.

The following types of polymers are used for the manufacture of single-use plastic products in Ukraine:

- polyethylene terephthalate,
- high-density polyethylene,
- low-density polyethylene,
- polyvinyl chloride,
- polypropylene,
- polystyrene
- other types of polymers (e.g. polycarbonate, polylactide, others).

In Ukraine, many plastic products, including single-use plastic products, have a common recycling symbol: a triangle formed by three twisted arrows with a number **in the middle indicating the type of polymer (Figure 1)**.

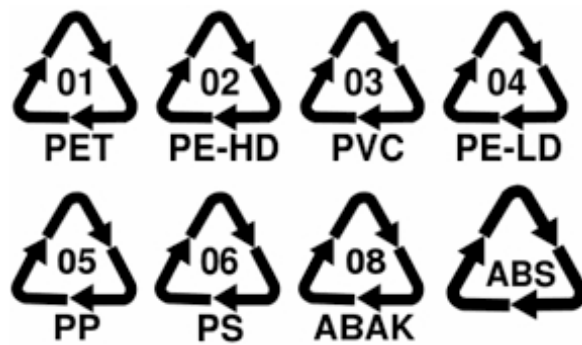


Figure 1. Types of plastic and its labeling

3. The Review of existing statistical data on production, export, import and realization of single-use plastic products by types and sectors of application shows that the production of single-use plastic products in Ukraine does not have a separate statistical observation, therefore, according to the available annual data of the State Statistics Committee of Ukraine "Production and realization of industrial products by types" it is possible to estimate the production of plastic products, which includes single-use plastic products.

It is shown that according to the National Classifier of Ukraine "Classification of Economic Activities DK 009:2010" / KVED-2010 (as amended on 04.01.2023), the production of plastic products is in group 22.2, which includes such classes of their production: 22.21 - production of plates, sheets, pipes and profiles made of plastics; .22 - production of containers made of plastics; 22.23 - production of construction products made of plastics and 22.29 - production of other products made of plastics.

Ukrainian production of plastic products, including plastic products, covered a significant part of Ukrainian consumers' needs in these goods and had a steady growth dynamics, but in 2022, due to military operations, this production significantly decreased.

The survey provides information on the total production volume of the main categories of plastic goods / possible single-use plastic products in Ukraine in 2021-2022 in physical terms (thousand tons) and their shares of the total production volume (%) for such categories of goods: packaging goods (this category includes containers for liquids, lids, specialized goods, bags and boxes, but due to the specificity of coding of goods it is impossible to separate them), tableware and household products.

Until 2022, more than 75% of plastic goods / possibly and single-use plastic products were exported from Ukraine abroad, but in 2022, their exports fell by more than half.

The survey provides information on exports of major categories of plastic goods, including single-use plastic, in 2019-2022 (thousand tons) for the following product categories: packaging goods (boxes, crates, bags, sacks, liquid containers, lids), tableware and household products.

The largest importing countries from Ukraine today are:

- Poland
- Germany
- Romania
- Moldova
- Georgia
- Latvia
- Belarus and Russia (until 2022).

Total imports of plastic products, including single-use plastic products, exceed domestic production and account for more than 60% of the country's market.

Including up to 2021, the volume of imports of plastic products to Ukraine grew, but in 2022 fell to the volumes of 2017-2018.

The Survey provides information on imports of major categories of plastic goods, including single-use plastic, in 2019-2022 (thousand tons) for the following product categories: packaging goods (boxes, crates, bags, sacks, liquid containers, lids), tableware and household products.

The largest exporting countries to Ukraine today are:

- Poland
- Germany
- China
- Turkey
- Italy
- Spain
- Israel
- France
- Canada
- Hungary
- Romania
- Lithuania
- **Belarus and Russia (until 2022)**



A number of companies are engaged in the sale of single-use plastic products of their own production and import, which are described on the website of the company "COMPASS Ukraine", representing the International Information System COMPASS in Ukraine and in thematic analytical reviews.

**The overview of the availability of alternatives to single-use** plastic by type of application provides some examples of existing alternatives on the market for single-use plastic products, which are listed in Part B of the Annex to Directive (EU) 2019/904.

Since the preparation and adoption of the draft law on the implementation of Directive (EU) 2019/904 and gradual restriction of the circulation of single-use plastic products on the territory of Ukraine is currently announced, the availability of alternatives to single-use plastic in the country will become a priority, and, first of all, it will concern single-use plastic products listed in Part B to Directive (EU) 2019/904.

At the same time, as of January 1, 2023, the Law of Ukraine came into full force in Ukraine "On Restricting the Circulation of Plastic Bags on the Territory of Ukraine", which became the legislative basis for the start of implementation of alternatives to single-use plastic in the country.

Today biodegradable bags, which are mainly made on the basis of corn starch, have become the actual replacement of thin and ultra-thin plastic bags in Ukraine, but, unfortunately, the country practically lacks the necessary infrastructure for their composting.

Also in Ukraine there are a number of companies producing and supplying goods that are an alternative to plastic products and are made of wood, paper, cardboard and other natural raw materials.

**The Survey on Public Opinion on** Ending Single-Use Plastic noted that public organizations, scientists and conscious consumers in Ukraine, despite some positive efforts, are still concerned about the amount of plastic, including single-use plastic, that is placed on the country's market and continues to be in significant demand among consumers.

The main public national movement to end the use of plastic products, including single-use plastic products, includes civil society organizations working on climate change and waste issues related to the presence and impact of plastic.

In general, there is some concern in Ukrainian civil society **regarding**

the growing amount of plastic waste, which is mostly generated by single-use plastic products (cotton swabs, straws, disposable tableware, food containers, polystyrene foam containers and beverage containers) and single-use plastic packaging, namely thin (wall thickness from 15 to 50 microns), oxo-degradable (material for their manufacture consists of polyethylene and oxo-degradable impurities) and ultra-thin plastic bags (with walls less than 15 microns thick).

Of interest is the initiative to study the efforts of Ukrainian supermarkets to reduce plastic pollution", which was implemented by the NGO "Zero Waste Society" - a member of the Ukrainian Climate Network in 2021-2022.

As part of the research, the organization conducted a survey among Ukrainian supermarkets to understand how the Ukrainian food retail sector (mainly supermarkets) is working to address plastic pollution issues. The questions in the questionnaire were grouped into three categories: transparency, ambitious commitments, and support for progressive government policies.

Waste management of single-use plastic packaging in Ukrainian supermarket chains was analyzed; their best practices and ambitious goals were identified, in particular, those related to the refusal of single-use packaging and plastic unsuitable for recycling, reduction of the amount of packaging, introduction of reusable packaging systems, delivery, etc.; difficulties encountered by companies in the process of implementation of initiatives were identified.

Practical recommendations for improving waste management systems in Ukrainian supermarkets and measures to engage supermarkets in practical steps to improve the current situation with single-use plastic packaging waste are given.

**The prepared Recommendations on the reduction of** production, export, import and use of single-use plastic, taking into account the sectors of application and availability of safe alternatives in Ukraine are addressed to the governmental decision-making bodies, namely:

1. Finalize the draft law allowing the implementation of Directive (EU) 2019/904 and gradually limit the circulation of single-use plastic products on the territory of Ukraine and make maximum efforts for its adoption.
2. Ensure absolute enforcement of the bans for single-use plastic products, especially single-use plastic straws, cutlery, plates, stirrers, food containers, polystyrene foam beverage cups and balls; products made of oxo-degradable plastic.
3. Introduce measures to ban single-use plastic products

- (apply reusable alternatives).
4. Formulate comprehensive quantitative goals for alternatives to achieve plastic use reduction and promote plastic reuse.
  5. As soon as possible (term to be determined additionally) to create extended producer responsibility schemes, which are stipulated by the Law of Ukraine "On Waste Management" (as amended on 29.06.2024), are mandatory for all and provide for eco-modulation of payments that will cover the full cost of collection, sorting and management of single-use plastic waste, as well as educational activities.
  6. Establish minimum targets for products for recycling (at least 50% for bottles and at least 30% for other products).
  7. Introduce a deposit-return container system or increase the capacity of existing collection systems, such as a returnable (deposit) container system, to meet the goals of eliminating the use of single-use plastic and switching to alternatives.
  8. Provide for full compliance with labeling requirements, ensuring clear and visible markings; their application other elements, in particular the presence of substances of particular concern.
  9. Introduce awareness-raising measures focused reducing consumption and disseminating available alternatives for multiple use.
  10. Ensure that data is carefully collected and monitored to evaluate and/or adjust performance measures.

## REVIEW OF EXISTING NATIONAL LEGISLATION TO REGULATE THE PRODUCTION, IMPORT, EXPORT AND USE OF SINGLE-USE PLASTIC PRODUCTS

To date, in Ukraine disposable plastic products, according to available data of the State Statistics Committee of Ukraine **"Production and realization of industrial products by types"**, do not fall under separate statistical observation, but, at the same time, there is an annual statistical observation of production and realization of plastic products, which includes disposable plastic products.

Also in Ukraine there is no separate national legislation regulating the production, import, export and use of single-use plastic products, so their handling is regulated by the norms of laws that primarily relate to plastic products and their waste. At the same time, the country is preparing a draft law, the adoption of which will make it possible to limit the circulation of single-use plastic on the territory of Ukraine.

Below is an overview of laws and bills on plastic products, including single-use plastic products:

The Law of Ukraine "On Restricting the Circulation of Plastic Bags on the Territory of Ukraine" dated June 1, 2021 No. 1489-IX<sup>1</sup> entered into force on December 10, 2021 and is aimed at reducing the use of plastic bags (which are mostly single-use plastic products) in Ukraine and limiting their distribution in order to improve the environment and landscaping.

The law is based on the provisions of Directive (EU) 2015/720 of the European Parliament and of the Council of April 29, 2015 on reducing the consumption of lightweight plastic bags<sup>2</sup>, which amends Directive 94/62/EC of December 20, 1994 on packaging and packaging waste<sup>3</sup>.

The law provides for the following standards:

- Effective December 10, 2021, the free distribution of plastic bags in retail, food and service establishments is prohibited.
- Effective March 10, 2022, a ban on the use in commerce of thin (wall thickness between 15 and 50 microns), oxo-degradable (to produce them

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1 <https://zakon.rada.gov.ua/laws/show/1489-20>

2 <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32015L0720>

3 <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:31994L0062>

use polyethylene and oxo-degradable impurities - salts of cobalt, nickel, iron, due to which such plastic bags disintegrate into small fragments, including microplastic) and ultra-thin plastic bags (with walls less than 15 microns thick), except for bags for primary packaging.

- As of January 1, 2023, only biodegradable bags may be used in Ukraine; their biodegradability is determined in accordance with harmonized European standards, and each bag is labeled accordingly, the procedure for which is approved by the Cabinet of Ministers of Ukraine.

In 2023, two almost identical draft resolutions of the Cabinet of Ministers of Ukraine have been prepared, namely "Procedure for labeling plastic bags"<sup>4</sup> and "Procedure for labeling biodegradable plastic bags"<sup>5</sup>: their adoption is expected.

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4 <https://mepr.gov.ua/povidomlennya-pro-oprylyudnennya-proyektu-postanovy-kabinetu-ministriv-ukrayiny-pro-zatverdzhennya-poryadku-markuvannya-plastykovykh-paketiv-2/>

5 <https://sk.ua/uk/shho-maie-buti-v-poryadku-markuvannya-plastikovih-paketiv/>



## Results of legislative restrictions on the circulation of plastic bags in Ukraine

One of the first players in the retail market to start complying with the Law of Ukraine "On Restricting the Circulation of Plastic Bags on the Territory of Ukraine" were large supermarket chains. This is primarily due to greater reputational risks for them, unlike small supermarkets, convenience stores or individual sellers<sup>6</sup>.

For example, the ATB-Market retail chain notes that the introduction of payment for plastic bags caused a drop in their sales. In 2020-2021, the average monthly sales of plastic bags for filling amounted to about 30 million pieces, and at the end of 2022 their sales fell by 57%.

At the same time, demand for reusable bags has increased - by the end of 2022, their average monthly sales increased by 25% compared to 2021. The company is also increasing sales of biodegradable prepackaging bags, with average monthly sales of around 18 million units, and this figure is growing.

According to the results of the analysis of the Association of Retailers of Ukraine for 2022, Ukrainians reduced the use of plastic bags by 40-90% depending on their type and more than doubled the consumption of biodegradable bags<sup>7</sup>.

But to date, the experience of practical implementation of the Law shows that there are several problems:

- Article 4 of the Law specifies that the biodegradability of plastic bags is determined in accordance with harmonized European standards. Biodegradable bags need to be properly labeled, but in practice this is far from being the case, and therefore problems may arise with their composting.
- Also, the country lacks the necessary infrastructure for composting of organic waste, including biodegradable bags, and there is no money to create it, except for the existence of a municipal composting station in Lviv<sup>8</sup>.
- Control over compliance with the requirements of the Law is entrusted to the State Consumer Service of Ukraine, but scheduled and unscheduled state control activities have been discontinued for the period of martial law. Inspections are carried out only in the presence of a threat that negatively affects the rights, legitimate interests, life and health of a person, as well as the protection of the environment and the security of the state.

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<sup>6</sup> <https://life.liga.net/poyasnennya/article/otkaz-ukrainy-ot-plastikovyh-paketov-dlitsya-bolee-polutora-let-kakie-rezultaty-eto-dalo>

- 7 <https://biz.liga.net/ua/ekonomika/all/novosti/za-god-ogranicheniy-na-plastikovye-pakety-ukraintsy-umenshili-ih-ispolzovanie-na-40-90>
- 8 <https://city-adm.lviv.ua/news/city/housing-and-utilities/297811-pererobka-orhaniky-u-lvovi-pratsiuie-kompostuvalna-stantsiia>

The Law of Ukraine "On Materials and Objects Intended for Contact with Foodstuffs" dated November 3, 2022 No. 2718-IX (as amended on 01.10.2023)<sup>9</sup>, which finally comes into force on 19.11.2025 and determines the legal and organizational basis for ensuring the safety of materials and objects intended for contact with foodstuffs, in order to ensure the protection of human life and health, as well as other rights and interests of consumers.

The law implements into national law the provisions of several EU acts, including Regulation (EU) No 2022/1616 of 15.09.2022 on recycled plastic materials and articles intended to come into contact with food<sup>10</sup>.

Article 8 of the Law formulates special requirements for certain groups of materials and objects intended for contact with food products and lists 18 groups of such materials, among which there is plastic, products of which are mostly single-use plastic products.

Article 10 of the Law formulates the requirements for materials and items made of recycled plastic and stipulates that materials and items made of recycled plastic may be in circulation only if they are produced (in full or in part) from recycled plastic obtained as a result of a technological process of plastic recycling that has undergone state registration.

Schedule 4 of the Act sets out the requirements for a quality assurance system for plastic recycling processes.

Order of the Ministry of Health of Ukraine from 11.12.2023 № 2104 "On Approval of Special Requirements for plastic materials and objects intended for contact with "<sup>11</sup> is a legislative and regulatory act of the Law of Ukraine "On materials and objects intended to come into contact with foodstuffs"; shall enter into force together with the entry into force of this Law; final date of entry into force - 19.11.2025.

Special requirements apply to plastic materials and items in circulation that fall into the following categories (para. 2, sect. I):

1. materials and objects and parts thereof consisting exclusively of plastic;
2. plastic layered materials and objects that are bonded together with adhesives or other methods;
3. materials and items specified in subparagraphs 1 or 2 of this list above, printed and/or coated;

<sup>9</sup> <https://zakon.rada.gov.ua/laws/show/2718-20#Text>

<sup>10</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32022R1616>

<sup>11</sup> <https://zakon.rada.gov.ua/laws/show/z2254-23#Text>



4. layers of plastic or plastic coatings forming gaskets in caps and plugs, which together with these caps and plugs form a set of two or more layers of different types of materials;
5. Plastic layers in multilayered materials and objects.

The Order determines that only substances included in the list of authorized substances (Annex 1 to these Special Requirements) or substances that are included in the state register of substances authorized for use in the production of materials and objects<sup>12</sup> may be used in the production of plastic layers in plastic materials and objects Section II, paragraph 1<sup>3</sup>.

In January 2021, by the Order of the Ministry of Natural Resources of Ukraine No. 25<sup>13</sup> dd. 16.01.2021, a Working Group for preparation of the [Draft Law of Ukraine "On Packaging and Packaging Waste"](#) was established. The result of its work was to be the preparation of the text of the relevant draft law by June 1, 2021.

This work was based on the implementation of paragraph 209 of the Action Plan for the implementation of the Association Agreement between Ukraine and the EU, approved by the Resolution of the Cabinet of Ministers of Ukraine dated October 25, 2017 No. 1106 (as amended on 18.09.2020.)<sup>14</sup> and in accordance with paragraph 104 of the National Waste Management Plan until 2030, approved by the Order of the Cabinet of Ministers of Ukraine dated February 20, 2019 No. 117-r (as amended on 17.09.2020)<sup>(15)</sup>; subparagraph 22 of paragraph 10 of the Regulation on the Ministry of Natural Resources of Ukraine, approved by the Resolution of the Cabinet of Ministers of Ukraine dated June 25, 2020 No. 614 (as amended on 29.06.2024)<sup>16</sup>.

To date, three draft laws have been registered in the Verkhovna Rada of Ukraine "On Packaging and Packaging Waste", namely, № 10066 18.09.2023 (introduced by the Cabinet of Ministers of Ukraine), № 10066-1 29.09.2023 (introduced by the Ministry of Natural Resources of Ukraine) and No. 10066-2 dated 04.10.2023 (introduced by a group of People's Deputies of Ukraine), which reflect approaches to the comprehensive implementation of the Law of Ukraine "On Waste Management" (as amended on 29.06.2024)<sup>(17)</sup> in the part concerning packaging and packaging waste, including single-use plastic packaging. Unfortunately, the complicated process of processing of the above-mentioned draft laws is still ongoing<sup>18</sup>.

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12 The State Register of Substances Authorized for Use in the Production of Materials and Objects and in Plastic Recycling Processes is an information and communication system that provides collection, accumulation, storage, accounting, record keeping, display, data processing and provision of information on substances authorized for use in the production of materials and objects, as well as on plastic recycling processes (Art. 1 of the Law of Ukraine "On Materials and Objects Intended for Contact with Food")

13 <https://mepr.gov.ua/documents/pro-stvorennya-robochoyi-grupy-z-pidgotovky-proyektu-zakonu-ukrayiny-pro-upakovku-ta-vidhody-upakovky/>

14 <https://zakon.rada.gov.ua/laws/show/1106-2017-n#Text>

15 <https://zakon.rada.gov.ua/laws/show/117-2019-p#Text>

- 16 <https://zakon.rada.gov.ua/laws/show/614-2020-п#Text>
- 17 <https://zakon.rada.gov.ua/laws/show/2320-20#Text>
- 18 <http://www.golos.com.ua/article/375226>

It should be noted that Schedule 1 to these Bills sets out the criteria for classifying an article or material as packaging and examples of packaging, including plastic products and single use packaging, as follows:

- Single-use beverage capsules (e.g., coffee, cocoa, milk) that remain empty after use;
- mascara brushes that are part of the container lids;
- plastic sleeves;
- Dispensing devices that are part of the lids of detergent containers;
- Mechanical hand mills filled with product, such as a pepper mill filled with pepper;
- plastic bags;
- disposable plates, glasses and lids;
- sandwich wrapping;
- plastic covers for clean clothes at dry cleaners;
- stir sticks;
- disposable forks, spoons, knives.

After the Law of Ukraine "On Restricting the Circulation of Plastic Bags on the Territory of Ukraine" was adopted in June 2021, it was planned to prepare and enact a legislative norm concerning single-use plastic products.

[The Draft Law of Ukraine "On Restriction of Production and Circulation of Single-Use Plastic Products on the Territory of Ukraine"<sup>19</sup>](#), No. 6077 dated 21.09.2021 was drafted at the initiative of a group of people's deputies of Ukraine even before the outbreak of the war.

The Draft Law No. 6077 had a number of comments presented on 01.02.2023 in the Conclusion of the Main Scientific and Expert Department of the Verkhovna Rada of Ukraine, and further, 05.09.2023, the Draft Law№ 6077 was withdrawn from consideration by the Verkhovna Rada of Ukraine.

Already at the beginning of 2023, the Ministry of Natural Resources of Ukraine finalized this draft law taking into account the comments and adapting it to the new realities. [The finalized draft law№ 6077-d "On measures to prevent and reduce the negative impact of plastic products on the environment"<sup>20</sup>](#) was prepared for the first reading.

This bill implemented the provisions of Directive 2019/904 of the European Parliament and of the Council (EU) of June 5, 2019 on reducing the impact of certain plastic

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19 [https://w1.c1.rada.gov.ua/pls/zweb2/webproc4\\_1?pf3511=72805](https://w1.c1.rada.gov.ua/pls/zweb2/webproc4_1?pf3511=72805)

20 <https://www.kmu.gov.ua/news/zaborona-odnorazovykh-plastykovykh-vyrobiv-v-ukraini-doopratsovanyi-zakonoproekt-rekomendovanyi-do-pershoho-chytannia>

products on the environment<sup>21</sup> into national legislation and established the following norms<sup>22</sup>:

1. Prohibition of the handling and distribution of single-use plastic products, namely cotton swabs, straws, disposable utensils, food containers, and beverage containers and receptacles made of polystyrene foam, etc. The ban also applies to all products made of oxo-degradable plastic. Among the exceptions, which will not be restricted for the time being due to a lack of alternatives, are containers made of biodegradable plastic and cups made of plastic-coated cellulose, or so-called "paper" glasses. Importantly, it is a ban on the distribution and circulation of such products on the territory of Ukraine. However, their production for export will be allowed. Therefore, Ukrainian business will not be deprived of the opportunity to continue working.
2. Mandatory European labeling for single-use products containing plastic but which cannot yet be subject to restrictions. This applies, for example, to wet wipes, tobacco products with filters, etc. Such labeling will inform the consumer about the presence of plastic in the products, its impact on the environment, and environmentally friendly ways of handling their waste.
3. Tools to incentivize consumers to switch to reusable alternatives. For example, by obliging retailers and catering establishments to offer a discount of at least 10% if consumers take food or beverages in their own reusable containers.
4. Support for companies that will reorient their operations to produce environmentally friendly reusable alternatives, particularly through the government's 5-7-9% Affordable Loans program.
5. Mechanisms for monitoring compliance with the Act.
6. Liability for violation of the requirements.
7. A period for business to adapt to the new rules.

Unfortunately, the prepared bill № 6077-d "On Measures to Prevent and Reduce the Negative Impact of Plastic Products on the Environment" was again not brought to its logical conclusion.

In July 2024, the Ministry of Natural Resources of Ukraine reported that a draft law is being prepared to implement Directive (EU) 2019/904 and gradually limit the circulation of single-use plastic products in Ukraine.

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21 <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32019L0904>

22 <https://www.kmu.gov.ua/news/zaborona-odnorazovykh-plastykovykh-vyrobiv-v-ukraini-doopratsovanyi-zakonoproekt-rekomendovanyi-do-pershoho-chytannia>

Thus, Ukraine has already taken certain steps to prepare and adopt legislative acts to regulate the production, import, export and use of plastic products, including single-use plastic products.

However, given the presence of military operations in the country and related social and economic processes, Ukraine needs to use certain instruments such as "transition periods" to implement and introduce into national legislation the norms related to the future global treaty on plastic and to stimulate the use of sustainable alternatives to single-use plastic products in Ukraine.

According to experts and specialists of the Ministry of Natural Resources and Environment of Ukraine, in the near future it should not be expected that a ban on the circulation of single-use plastic products will be established in Ukraine. They believe that first it is necessary to develop the relevant national legislation and determine the transition periods for the introduction of certain requirements, the stages of gradual withdrawal of such products from the market and the transition to alternatives, and it is this work based on the analysis of global trends that has already begun<sup>23</sup>.

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23 <https://mepr.gov.ua/koly-v-ukrayini-obmezhat-obig-odnorazovyh-plastykovyh-vyrobiv/>



## AN OVERVIEW OF EXISTING TYPES OF SINGLE-USE PLASTICS, INCLUDING APPLICATIONS AND TYPES OF POLYMERS USED

In the Draft Law of Ukraine "On Restriction of Production and Circulation of Single-Use Plastic Products on the Territory of Ukraine" No. 6077 it was defined that single-use plastic products are products that are manufactured in whole or in part from plastic and are not intended, envisaged or put into circulation and are not distributed for multiple use by returning them to the manufacturer for re-filling or reuse for the same purpose for which they were intended.

This definition coincides with the definition of single-use plastic articles as given in Directive (EU) 2019/904 (Article 3(2)), namely it is "an article made wholly or partly of plastic and which is not conceived, designed or placed on the market to fulfill, during its lifetime, multiple uses by returning it to the manufacturer for refilling or reuse for the same purpose for which it was conceived".

### 23.1. Types of single-use plastic

Directive (EU) 2019/904 applies to all single-use plastic articles listed in the Annex and to all articles made from oxo-degradable plastics and to fishing tackle containing plastic, namely<sup>24</sup>:

1. Balloons;
2. Balloon sticks;
3. Beverage up to three liters, including lids and caps;
4. Polystyrene foam beverage containers, including lids and caps;
5. Beverage bottles up to three liters, including caps and lids;
6. Beverage stirrers;
7. Cotton swabs;
8. Drink glasses;
9. Polystyrene foam beverage glasses including lids and caps;
10. Beverage glasses, including lids and caps;
11. Cutlery cutlery (forks, knives, spoons, chopsticks for chopsticks);

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<sup>24</sup> Commission guidelines on single-use plastic products in accordance with Directive (EU) 2019/904 of the European Parliament and of the Council on the reduction of the impact of certain plastic products

on the environment Commission guidelines on single-use plastic products in accordance with Directive (EU) 2019/904 of the European Parliament and of the Council on the reduction of the impact of certain plastic products on the environment (2021/C 216/01). - [https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52021XC0607\(03\)&from=EN](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52021XC0607(03)&from=EN)

12. Food Container;
13. Polystyrene foam food containers;
14. Lightweight plastic bags;
15. Bags and wrappers;
16. Plates;
17. Hygienic pads (tampons), tampons and tampon applicators;
18. Straws;
19. Tobacco products with filters and filters intended for use conjunction with tobacco products;
20. Wet wipes.

The following is a definition of the types of single-use plastic articles/ single-use plastic articles according to the principle of application of the requirements of Directive (EU) 2019/904, namely:

- a. reduction in consumption;
- b. limiting market placement;
- c. product requirements, Article 6(1) to (4); authorizing the placing on the market of single-use plastic products listed in Part C of the Annex only if the caps and lids remain attached to the containers at the stage of intended use of the products and, for the purposes of this Article, metal caps or lids with plastic seals shall not be deemed to be made of plastic.





The corresponding categorization of single-use plastic articles by type is given below:

Relevant part of the Annex of Directive (EU) 2019/904	List of single-use plastic products
<p>PART A</p> <p>Single-use plastic products covered by Article 4 on consumption reduction</p>	<p>(1) Beverage glasses, including their lids and caps;</p> <p>(2) Food containers, that is, containers, such as boxes, with or without a lid, which are used for the storage of food, viz:</p> <ul style="list-style-type: none"> <li>(a) are intended for immediate consumption, either on-site or takeaway,</li> <li>(b) are normally consumed from the vessel,</li> <li>(c) ready for consumption without further preparation such as cooking, boiling or heating, including food containers used for fast food or other meals ready for immediate consumption, excluding beverage containers, plates, bags and wrappers containing food.</li> </ul>
<p>PART B</p> <p>Single-use plastic products subject to Article 5 on the restriction of placing on the market</p>	<p>(1) Cotton swabs, except when to Council Directive 90/385/EEC or Council Directive 93/42/EEC;</p> <p>(2) Cutlery (forks, knives, spoons, chopsticks);</p> <p>(3) Plates;</p> <p>(4) Straws, unless they are subject to Directive 90/385/EEC or Directive 93/42/EEC;</p> <p>(5) Beverage Agitators;</p> <p>(6) Sticks for attaching and supporting balloons, except balloons for industrial or other professional use and uses that are not distributed to consumers, including the mechanisms of such sticks;</p> <p>(7) Polystyrene foam food containers, that is, containers, such as boxes, with or without a lid, used for food storage, which:</p> <ul style="list-style-type: none"> <li>(a) are intended for immediate consumption, either on-site or takeaway,</li> <li>(b) are normally consumed from the vessel,</li> <li>(c) ready for consumption without further preparation such as cooking, boiling or heating, including food containers used for fast food or other meals ready for immediate consumption, excluding beverage containers, plates, bags and food wrappers;</li> </ul> <p>(8) Polystyrene foam beverage containers, including their caps and lids;</p> <p>(9) Polystyrene foam beverage cups, including their caps and lids.</p>



- According to the Ministry of Natural Resources of Ukraine, the draft law on gradual restriction of circulation of single-use plastic products on the territory of Ukraine, which is currently being prepared, will allow to implement Directive (EU) 2019/904 into national legislation and gradually restrict the circulation of single-use plastic products on the territory of Ukraine. In particular, it is planned to prohibit the production, import, introduction into circulation and distribution of the following products<sup>25</sup>:
  - hygienic cotton swabs with a plastic base;
  - Styrofoam containers and plastic containers in the form of blister packs or trays for ready-to-eat food products that are consumed on site or taken to go;
  - stirrers and drinking straws;
  - sticks attached to balloons;
  - skewers; disposable forks, knives, spoons, plates, etc.

This list of single-use plastic products, which is given in the new draft law being prepared for discussion and consideration, corresponds to the list of single-use plastic products whose placing on the EU market is restricted, effectively prohibited (Article 5 of Directive (EU) 2019/904) and which is set out in Part B of the Annex to Directive (EU) 2019/904.

## Applications of single-use plastic products

Single-use plastic products, according to the Ukrainian classification, belong to the class "Non-food", which is divided into relevant complexes/subclasses and groups and are widely used in Ukraine. Below is information on the main users of single-use plastic in various spheres of production and consumption<sup>26</sup>:

- B2B (Business-to-Business) sector:
- Food industry enterprises are the main consumers of disposable packaging (food containers, food film and water bottles, lids, etc.).
- Agro-industrial enterprises are large consumers of plastic products, including disposable plastic (containers for storing vegetables, household goods).
- Manufacturing companies also purchase packaging and raw materials for the manufacture of single-use plastic products, namely liquid containers, lids, bags and film.
- Catering companies, including the fast food industry, purchase disposable plastic utensils (plates, spoons, knives, forks,

<sup>25</sup> <https://mepr.gov.ua/yakshho-plastykovi-plyashky-to-z-prykriplenymy-kryshkamy-vidsogodni-u-yes-diye-nove-pravylo/>

<sup>26</sup> <https://pro-consulting.ua/ua/issledovanie-rynka/analiz-rynka-izdelij-s-plastika-v-ukraine-2023-god-1>

- beverage glasses, lids, straws), food storage containers, garbage bags, etc.
- Hardware stores and D<sup>2</sup>Y stores, sell a variety of plastic household products, including disposable utensils, bags, etc.
  - Supermarkets, hypermarkets and their chains are the largest distributors of plastic goods to the end consumer, including disposable bags and sacks and disposable tableware.

Other businesses that purchase household products including disposable trash cans, bags, etc. and use them to furnish offices.

### **B2G (Business-to-Government) sector:**

Health care facilities purchase plastic buckets, basins, tubs, utensils/disposable dishes, trays, special containers/disposable containers for storage of tests and transportation.

Educational institutions - kindergartens, schools, universities - purchase plastic goods in the same way as offices, in particular disposable bags and disposable tableware.

### **B2C (Business-to-Consumer) sector:**

Here, the main consumers of plastic products, including single-use plastic, are the adult population of the country. Retail consumers, who run households and organize their everyday life, choose plastic household products and plastic tableware of various brands, which are available in the domestic market of the country.

According to the results of the survey conducted within the framework of the European Union for Environment (EU4Environment) program and presented in the Analytical Report on Prioritization of Sustainable Public Procurement and Analysis of Market Readiness in Ukraine<sup>27</sup>, 164 respondents - participants of public procurement (customers, suppliers, contractors, representatives of national expert organizations, institutions and other stakeholders), believe that the most purchased goods among single-use plastic products are such products (agree with

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27 (EU4Environment (2022), "Analytical Report on Prioritization of Steel Public Procurement and Market Readiness Analysis in Ukraine"). - <https://livingplanet.org.ua/images/2023/SPP-Priorities-in-Ukraine-UKR-FINAL.pdf>

28 <https://zakon.rada.gov.ua/rada/show/v1749731-15#Text>








29 <https://livingplanet.org.ua/images/2023/SPP-Priorities-in-Ukraine-UKR-FINAL.pdf>

## 2.3 Types of polymers used for the manufacture of single-use plastic products

<b>CPV class</b>	<b>Product Category</b>
9640000-4	Polyethylene bags and garbage bags
19520000-7	Plastic products (this can include single-use plastic)
39222110-8	Disposable tableware and plates
39222100-5	Disposable tableware for catering companies



The Society of the Plastics Industry introduced a code system in 1988 to help recycle plastics by polymer type. Many plastic products, including plastics, share a common recycling symbol: a triangle formed by three swirling arrows with a number in the middle indicating the polymer type. There are six polymer types and one mixed category with the number 7<sup>30</sup> that are used to label plastic products:

 <p>PETE</p>	<p>RETE or PET, polyethylene terephthalate, is a transparent material used to make mostly disposable PET soft drink bottles and food containers.</p>
 <p>HDPE</p>	<p>HDPE is a high-density polyethylene, most often used to create dense and opaque disposable bottles that are used to fill cosmetic products, dairy products and some household detergents.</p>
 <p>V</p>	<p>PVC (V) - polyvinyl chloride, used to create disposable packaging for cosmetics and medicines, as well as disposable films and some toys. PVC is very toxic and can release dioxins when burned.</p>
 <p>LDPE</p>	<p>LDPE - low density polyethylene, used to create disposable bread bags, plastic shopping bags, frozen food bags, sandwich containers and disposable food film.</p>
 <p>PP</p>	<p>PP - polypropylene, material for disposable food packaging, beverage cups; reusable lunch containers and food storage.</p>
 <p>PS</p>	<p>PS - polystyrene, used disposable tableware, egg and food trays. Due to its toxicity associated with possible styrene leakage, it is not intended for prolonged contact with food.</p>
 <p>OTHER</p>	<p>OTHER - other types of polymers. This includes, for example, polycarbonate used for the production of transparent solid products (baby bottles). This group also includes naturally degradable plastics (lactic acid monomerized polylactide).</p>

30 <https://www.plasticsoupfoundation.org/en/plastic-problem/what-is-plastic/recycling-codes/>

## Review of existing statistics on production, exports, imports and sales of plastic articles by type and sector of application

### Production of single-use plastic products

The production of single-use plastic products in Ukraine does not have a separate statistical observation, so according to the available annual data of the State Statistics Committee of Ukraine "Production and realization of industrial products by types" it is possible to estimate the production of plastic products, which includes single-use plastic products.

The National Classifier of Ukraine "Classification of Economic Activities DK 009:2010" / KVED-2010 (as amended on 04.01.2023)<sup>31</sup> defines the following hierarchy of plastic products production:

ITC 2010	DK 009:2010 list of sections		
	Section C	Processing industry	
	Section 22	Manufacture of rubber and plastic products	
		Group 22.2	Manufacture of plastic products

Group 22.2 Manufacture of plastic products includes the processing of new or used plastic resins into intermediate or finished products using processes such as molding, stamping, blowing, and casting. This manufacturing process results in a wide range of plastic products.

Group 22.2 includes the following classes of manufacture of articles:

Class	Title
22.21	Production of plates, sheets, pipes and profiles made of plastics
22.22	Production of plastic containers
22.23	Manufacture of construction products from plastics
22.29	Manufacture of other plastic products

31 <https://zakon.rada.gov.ua/rada/show/vb457609-10#top>

Class 22.29 includes:

- production of table, kitchen and toilet articles made of plastics;
- production of various plastic products:
  - hats, insulating fittings, parts of lighting fixtures, stationery or school supplies, articles of clothing (solid, without seams), furniture fittings, figurines, conveyor belts and drive belts, self-adhesive tapes, shoe heels, mouthpieces and curlers, other small plastic items.
- production of leather substitutes from plastics;
- production of rolled plastic products (self-adhesive plates, sheets, film, foil, strips, tapes);
- manufacture of combs, hair pins and similar products made of hard rubber.

Class 22.29 does not include:

- manufacture of plastic road products (Class 15.12)
- Manufacture of footwear made of plastics (Class 15.20)
- Manufacture of furniture made of plastics (classes 31.01, 31.02, 31.09)
- Manufacture of uncovered foam mattresses (Class 31.03)
- Manufacture of sports articles made of plastics (Class 32.30)
- Manufacture of games and toys made of plastics (Class 32.40)
- Manufacture of medical and dental accessories made of plastics Class 32.50)
- Manufacture of ophthalmic articles of plastics (Class 32.50)
- Manufacture of helmets and other accessories made of plastics for personal protection (Class 32.99).

Statistics on production and sales of plastic products/possible single-use plastic products by type for 2021-2022 are available here<sup>32</sup>.

Ukrainian production of plastic products, including plastic products, covered a significant part of Ukrainian consumers' needs in these goods and had a steady growth dynamics.

But in 2022, this production was significantly reduced due to the fighting. Many manufacturing companies were located in the east and south of the country and therefore they either stopped production or relocated their facilities.

The change in market volumes was also influenced by raw materials as until 2022 Ukraine purchased plastic for processing mainly in Russia and Belarus, but now - in the EU, and therefore the change of suppliers and organization of deliveries from the EU took time and affected both the price of raw materials and the cost of their logistics.

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32 <https://ukrstat.gov.ua>



Below is the information on the total volume of production of the main categories of plastic goods / possible single-use plastic products in Ukraine in 2021-2022 in physical terms, thousand tons and shares of the total volume, %<sup>33</sup>:

	2021 p.	Part, %	2022 p.	Part, %
Goods for packaging*	27,08	40 %	17,70	44 %
Dishes	9,14	13 %	6,22	15 %
Household products	9,37	14 %	5,85	14 %

\*) Category includes containers for liquids, lids, specialized goods, bags and boxes (due to the specific coding of goods, it is not possible to separate them)

### Exports of single-use plastic products from Ukraine

Until 2022, more than 75% of plastic goods / possibly and single-use plastic products were exported from Ukraine abroad. But in 2022, their exports decreased by more than half.

Below is information on exports of the main categories of plastic goods / possibly and single-use plastic products from Ukraine in 2022, thousand tons<sup>34</sup>:

Main product categories, including single-use plastic	2019	2020	2021	2022
Packaging products	Boxes, crates			
	23,97	2,03	4,75	3,76
	Bags, sacks			
	7,95	9,73	10,66	1,40
	Containers for liquids			
	7,53	6,47	6,66	5,79
Dishes	Lids			
	7,40	7,03	7,76	2,86
Dishes	-	1,09	1,09	0,70
Household products	-	2,02	2,12	1,59

The largest importing countries from Ukraine today are Poland, Germany, Romania, Moldova, Georgia and Latvia, and until 2022 - Belarus and Russia.

<sup>33</sup> <https://pro-consulting.ua/ua/issledovanie-rynka/analiz-rynka-izdelij-s-plastika-v-ukraine-2023-god-1>

<sup>34</sup> <https://pro-consulting.ua/ua/issledovanie-rynka/analiz-rynka-izdelij-s-plastika-v-ukraine-2023-god-1>

## Import of single-use plastic products to Ukraine

Total imports of plastic products, including single-use plastic products, exceed domestic production and account for more than 60% of the market.

Including up to 2021, the volume of imports of plastic products to Ukraine grew, but in 2022 fell to the volumes of 2017-2018.

The main reason for this was the outbreak of hostilities and the decrease in imports in the first months due to the uncertainty of the situation in the country, problems with supplies from abroad, a decrease in demand given the migration of the population from the country and the temporary suspension of the activities of consuming industries (economically gravitating to the areas where the products are consumed), and the stoppage of supplies from aggressor countries.

Below is information on imports of main categories of plastic goods / possibly and single-use plastic products to Ukraine in 2019-2022, thousand tons<sup>35</sup>:

Main product categories, including single-use plastic	2019	2020	2021	2022
Packaging products	Boxes, crates			
	5,79	3,26	9,14	3,78
	Bags, sacks			
	3,83	4,54	4,60	7,38
	Containers for liquids			
	10,42	10,54	9,56	28,15
	Lids			
	9,67	10,44	12,00	6,45
Dishes	5,82	6,89	7,63	3,96
Household products	9,22	9,22	10,52	6,70

The largest exporting countries to Ukraine today are Poland, Germany, China, Turkey, Italy, Spain, Israel, France, Canada, Hungary, Romania and Lithuania, and until 2022 - Belarus and Russia.

A number of companies are engaged in the sale of single-use plastic products of their own production and import, which are described on the website of the company "COMPASS Ukraine", representing the International Information System COMPASS in Ukraine and in thematic analytical reviews <sup>36,37</sup>.

35 <https://pro-consulting.ua/ua/issledovanie-rynka/analiz-rynka-izdelij-s-plastika-v-ukraine-2023-god-1>

36 <https://www.kompass.ua>; <https://ua.kompass.com/a/посуд-з-пластику-одноразовий/2056005/>

37 <https://pro-consulting.ua/ua/issledovanie-rynka/analiz-rynka-izdelij-s-plastika-v-ukraine-2023-god-1>



## Overview of the availability of alternatives to single-use plastics by type of application

Under Article 5 of Directive (EU) 2019/904, certain single-use plastic products, a list of which is set out in Part B of the Annex to the Directive, are restricted (effectively banned) from being placed on the EU market.

Many alternatives to single-use plastic products are now emerging around the world, and the list of alternatives is growing. Alternatives have both certain advantages and disadvantages, but their support and promotion should change society's attitude towards plastic products in general, believing that safe alternatives to certain plastic products are key to efforts to reduce environmental burdens and contribute to reducing the use of virgin plastics with a comprehensive ban on the use of hazardous chemicals in them.

Below are some examples of existing alternatives on the market for single-use plastic products from Part B of the Annex to Directive (EU) 2019/904, namely<sup>38,39,40,41</sup>:

Disposable plastic product	Alternative
Hygienic plastic cotton swabs	It is recommended to stop using cotton swabs and return to traditional ear cleaning procedures - use ready-made or homemade oil earwaxes drops, hydrogen peroxide; wash ears with warm water and a washcloth. Alternatives include bamboo cotton swabs, organic cotton makeup remover cotton pads, or reusable silicone swabs.
Cutlery (forks, knives, spoons, chopsticks)	Cutlery made of steel, bamboo, sugar cane pulp, wooden cutlery made of eco-friendly birch. Edible cutlery made of wheat, rice or sorghum is fully biodegradable and edible, and does not require disposal. Disposable biodegradable cornstarch cutlery is a compostable alternative to plastic cutlery. Paper cutlery.

<sup>38</sup> <https://www.ecosistant.eu/en/single-use-plastic-alternatives/>

<sup>39</sup> <https://ru.anchenggy.com/blog/6-sustainable-alternatives-to-single-use-plastic-cutlery-2024.html>

<sup>40</sup> <https://theroundup.org/what-to-use-instead-of-q-tips/>

<sup>41</sup> <https://www.ecogreenstraws.com/eco-friendly-alternatives-to-plastic/>

Plates	Sugar cane plates. Resistant to cold, heat, water, grease and safe for Microwaveable; fully compostable. Wheat bran plates. Paper plates.
Straws	Straws or tubes made from stalks of cane or rye stalks, which are still in ancient use. Stainless steel or glass straws can be used almost "forever" but cleaning them is not easy. Using raw pasta as straws. Edible straws can be eaten or left as fully decomposable waste. The tubes are paper, but they soften quickly and decompose in about a month.
Beverage stirrers	Reusable glass, bamboo stirrers or spoons. You can try using celery stick, carrot, cucumber, rosemary or herb sticks.
Sticks for attaching and supporting balloons	It is recommended to plan a planet-friendly party and forgo balloons; opt for more eco-friendly decor options: paper lanterns, recycled garlands, homemade soap bubbles and flowers.
Polystyrene foam food containers, i.e. containers such as boxes, with or without a lid	Stainless steel food boxes (lunch boxes).
Polystyrene foam beverage containers, including their caps, and covers	Glass or stainless steel bottles.
Polystyrene foam beverage cups, including their caps and lids	Glasses made of bamboo. When buying, it is necessary to carefully study the labeling of the product, as it may contain added plastics. Drinking cups made of polylactide bioplastic (PLA), which is produced on the basis of lactic acid primarily from corn starch. They can only be used once, but the product is fully compostable within 60 days. Paper cups.

After the preparation and adoption of the draft law announced by the Ministry of Natural Resources of Ukraine, which will allow to implement Directive (EU) 2019/904 and gradually limit the circulation of single-use plastic products on the territory of Ukraine, the availability of alternatives to single-use plastic in the country will become a priority, and, first of all, it will concern single-use plastic products listed in Part B to Directive (EU) 2019/904.

At the same time, since January 1, 2023, the Law "On Restriction of Plastic Bags Circulation on the Territory of Ukraine" came into full force in Ukraine, which became the legislative basis for the beginning of implementation of alternatives to single-use plastic in the country.

The actual replacement of thin and ultra-thin plastic bags in Ukraine has become biodegradable bags, which are mainly made on the basis of corn starch, and their biodegradability is determined in accordance with harmonized European standards (Art. 4 of the Law) and requires proper labeling.

A biodegradable bag can be fully biodegradable, but unfortunately there is currently little or no sufficient infrastructure in the country to accomplish their composting.

A biodegradable bag can also be made on a biological basis, for example it is composed of sugarcane or starch (80%) and plastic (20%) therefore such "biodegradable" bags are not composted.

It should be noted that in addition to alternatives for single-use plastic products from Part B to Directive (EU) 2019/904, there are also a large number of alternatives to other types of single-use plastic on the global market<sup>42,43</sup>.

Today in Ukraine there are a number of companies producing and supplying goods that are an alternative to plastic products and are made of wood, paper, cardboard and other natural raw materials.

For example, the company BIONUS<sup>44</sup> produces a line of disposable biodegradable tableware from natural raw materials - beet pulp, corn, flax, hemp and soybean meal.

The startups FoodBIOPack and REKAVA make biodegradable packaging based on polysaccharide (common starch) and recycle used coffee cake into biodegradable disposable tableware<sup>45,46</sup>.

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42 <https://cheeki.com.ua/blog/184-top-5-ekologichnykh-zamenitelej-plastika.html>

43 <https://www.racv.com.au/royalauto/sustainability/sustainable-living/reduce-plastic-waste.html>

44 <https://bionus.com.ua/pro-kompaniyu/>

45 [http://www.recpc.org/novyny/greenchem\\_innovation\\_new\\_products\\_27-09-2023\\_ua/](http://www.recpc.org/novyny/greenchem_innovation_new_products_27-09-2023_ua/)

46 <https://www.ukrinform.ua/rubric-technology/2625872-sumske-nouhau-paketi-aki-mozna-isti.html>

"Green" modernization of the Ukrainian economy is supported by the Center for Resource Efficient and Cleaner Production<sup>47</sup> by introducing the concept of resource efficient and cleaner production at enterprises.









The availability of alternatives is demonstrated by the information on the assessment of the market availability of sustainable goods, works and services for 19520000-7 Plastic products (in the context of catering services and goods for children's establishments) presented in the Analytical Report on Prioritization of Sustainable Public Procurement and Market Readiness Analysis in Ukraine, (EU4Environment (2022)<sup>(48)</sup>:

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47 <http://www.recpc.org>

48 <https://livingplanet.org.ua/images/2023/SPP-Priorities-in-Ukraine-UKR-FINAL.pdf>



The product is traditional	Price, UAH.	Availability of a more sustainable alternative in the market	Price, UAH
<p>Disposable plastic tableware</p> 	19,9	<p>Disposable paper tableware for 5 persons</p> 	24,99
<p>Disposable tableware Lunch box for second courses</p> 	3,8	<p>Disposable cane tableware Lunch box for second courses</p>  <p>Код: 9533 Ланч бокс одноразовый с тростника одноразовая эко посуда для доставки еды 145x140x75 в упаковке 50 шт.</p>	4,0
<p>Plastic bags for packaging and garbage EuroStandart TM garbage bags blue, 35 l (30 pcs/roll). Price per roll 18.60 UAH.</p> 	18,6	<p>Natural starch bags DELAMARK TM, 35 l (20 pcs/roll). Price for 1 pc. 5 UAH.</p> 	5,0
<p>Garbage bags <b>TM DIONIS 35 l (30 pcs./roll)</b> Price per roll 18,60 UAH. <b>Price for 1 pc 0,61 UAH.</b></p> 	0,61	<p><b>Natural starch bags TM Freken Bock, 35 l (20 pcs./roll).</b> <b>Price for 1 pc. 2,75 UAH.</b></p> <p>Пакеты для мусора Фрекен Бок Go Green, 35 л, 20 шт.</p> 	2,75



Thus, today in Ukraine there is a positive trend towards abandoning single-use plastic products and replacing them with safer alternatives.

The Law of Ukraine "On Restricting the Circulation of Plastic Bags on the Territory of Ukraine" has become mandatory in the legislative field, a draft law is being prepared that will allow the implementation of Directive (EU) 2019/904 and gradually restrict the circulation of single-use plastic products on the territory of Ukraine, and all this creates the basis for the future introduction of sustainable alternatives to single-use plastic products in Ukraine.

Businesses and the market are already responding to the need for alternatives to single-use plastic and are willing to continue to do so, but it is important to recognize that there is no single solution to single-use plastic and all alternatives have significant limitations<sup>49</sup> that need to be considered going forward.

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<sup>49</sup> <https://www.food.gov.uk/research/alternatives-to-single-use-plastics-results>

## Public opinion on ending single-use plastic: what types of plastic consumers consider important and why

Public organizations, scientists and conscious consumers in Ukraine, despite some positive efforts, are still concerned about the amount of plastic, including single-use plastic, that is placed on the country's market and continues to be in significant demand among consumers.

The main public national movement to end the use of plastic products, including single-use plastic products, includes civil society organizations working on climate change and waste issues related to the presence and impact of plastic.

Ukrainian Climate Network (UCN) - Ukraine's largest association of pro-climate public organizations and initiatives <sup>50,51</sup>; Public Union "Ukrainian Alliance Zero Waste" - an association of organizations and activists working to minimize and prevent waste generation in Ukraine <sup>52,53</sup>; Public Organization "All-Ukrainian Youth Movement Let's Do It, Ukraine" <sup>54</sup>, which is the representative of the international organization Let's Do It World in Ukraine in the areas of its activities and projects include work to address the problem of plastic waste <sup>(52,53)</sup>; Public Organization "All-Ukrainian Youth Movement Let's Do It, Ukraine" <sup>54</sup>.

For example, "Let's do it, Ukraine" NGO is engaged in educating citizens to respect the environment by implementing large-scale practical actions to clean up garbage, including plastic waste; launched a national map of recycling collection points.

Zero Waste Society<sup>55</sup>, a CCS member NGO, implemented the initiative in 2021-2022 "A study of Ukrainian supermarkets' efforts to reduce plastic pollution".

It was noted that supermarkets played a significant role in reducing the consumption of plastic products and the generation of plastic waste by occupying a unique position between consumers and suppliers, enabling them to significantly influence the transition from a single-use society to one in which the use of virgin plastics was drastically reduced, with a comprehensive ban on the use of hazardous chemicals in them and the generation of plastic waste.

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50 [https://ucn.org.ua/?page\\_id=5650](https://ucn.org.ua/?page_id=5650)

51 <https://ucn.org.ua/?s=пластик>

52 <https://zerowaste.org.ua>

53 <https://zerowaste.org.ua/?s=пластик>

54 <https://letsdoitukraine.org>

55 <https://zwsociety.org/about/#mission-vision>

As part of the Study, Zero Waste Society conducted a survey among Ukrainian supermarkets from September to December 2021 to understand how the Ukrainian food retail sector (mainly supermarkets) is working to address plastic pollution issues, assess the current situation and provide recommendations to encourage supermarkets to take practical steps to improve it. The questions were grouped into three categories, namely transparency, ambitious commitments and support for progressive public policy.

The results of the Study presented<sup>56</sup>:

- analyzing the general state of packaging waste management in Ukrainian supermarket chains;
- Identification of best practices and ambitious goals for supermarkets, in particular those related to the elimination of single-use packaging and non-recyclable plastic, reduction of packaging quantities, introduction of reusable packaging and delivery systems, etc.;
- Finding out the difficulties encountered by companies in the process of implementing initiatives;
- practical recommendations for improving waste management systems of Ukrainian supermarkets.

The implementation of the recommendations provided by the supermarkets will help improve the plastic pollution situation in the country by implementing the following steps:

- Increasing transparency and regularly publicizing its plastic footprint and ambitious clear commitments.
- Discourage excessive packaging and debug reuse and overflow systems.
- Support support for progressive legislative measures, such as such as deposit and repayment system.

Thus, it can be stated that in the civil society of Ukraine there is a certain concern about the growing amount of plastic waste, which is produced mostly by single-use plastic goods (cotton swabs, straws, disposable tableware, food containers, Styrofoam containers and beverage containers) and single-use plastic packaging, namely thin (wall thickness between 15 and 50  $\mu\text{m}$ ), oxo-degradable (the material for their manufacture consists of polyethylene and oxo-degradable impurities) and ultra-thin plastic bags (with walls less than 15  $\mu\text{m}$  thick).

56 <https://zwsociety.org/wp-content/uploads/ukrainian-retailers-report-2022-1.pdf>

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More information about the  
project:  
[www.hej-support/ecca-plastic](http://www.hej-support/ecca-plastic)



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