

# Position Paper

## Global Agreement on Plastics: A circular economy approach

### *Key messages:*

- *Plastics Europe supports the development of an international agreement addressing the challenge of plastic pollution*
- *Several measures introduced by the New Circular Economy Action Plan (CEAP) can help promote the sustainability of plastics throughout their life cycle and the creation of circular economies for plastics.*

Plastics Europe supports the development of an international agreement addressing the challenge of plastic pollution and transboundary leakage through sustainable consumption and production, design and technology innovation, and infrastructure investment.

In Europe, the New Circular Economy Action Plan (CEAP) announced several legislative and non-legislative initiatives aimed at transitioning to a circular and climate neutral economy along key product value chains. In addition to the EU Plastic Strategy, measures introduced by the New CEAP aim to promote the sustainability of plastics throughout their life cycle.

As the European Union and its Member States move forward with the negotiation of an international agreement, plastics manufacturers have identified measures proposed by the New CEAP which will support achieving the goal of eliminating leakage of plastics into the environment. We therefore provide the following recommendations:

### Upstream measures

- **The development, with industry input, of clear definitions** (e.g. of plastic, Single-Use Plastic (SUP) products, microplastics). We do not support the adoption of horizontal definitions (e.g. reusable, over-packaging) which apply to all materials, in a global agreement addressing plastic pollution.
- **The adoption, with industry input, of technical standards on sustainable plastic product design and recycled content** (e.g. standards on e.g., caps, labelling). Mandatory product design requirements, e.g., restrictions on use of additives, monolayer materials etc. could prevent consumer access to quality products and inhibit innovation. Furthermore, restrictions on the use of additives are already addressed via risk assessment by the Stockholm Convention on Persistent Organic Pollutants and the Strategic Approach to International Chemicals Management (SAICM).
- **The issuing of guidance, as part of national action plans, on sustainable plastic products, including on recycled content, and resource efficiency optimisation.** This should be developed with industry input to facilitate trade and the uptake of the circular economy. We oppose

mandatory, top-down and plastic-specific international sustainability criteria. These would lead to restrictions and bans and will not allow flexibility, which is important for countries to adapt their regulatory framework and prevent adverse environmental, health, and socio-economic impacts.

- **The development of a methodology to prevent plastic waste pollution based on UNEP Life-cycle initiative on SUP products.** We recommend avoiding the adoption of mandatory restriction measures, e.g., SUPD-like product bans, consumption reductions, to avoid unintended consequences, including on sanitation (drinking water, food conservation), health (disposable masks and gloves) and safety.
- **The sharing of best practices, building on the experience of the Circular Plastic Alliance<sup>1</sup> (CPA) as value-chain initiative to establish targets on recyclates and how to reach them, as well as on sustainable plastic products.** The adoption of top-down mandatory targets for recycling will preclude much needed flexibility, which is key for countries to adapt their regulatory framework and prevent adverse environmental, health, and socioeconomic impacts.

### Midstream measures

- **The adoption of technical standards on waste management**, i.e., sorting, collection and recycling technologies (including mechanical and chemical recycling). Examples include the Circular Plastics Alliance request to CEN on plastic waste quality; Eco-design and Advanced Recycling definitions including mass balance by Japan Chemical Industry Association together with ISO; standards on eco-design and pyrolysis oil developed by China Petroleum and Chemical Industry Federation.
- **The adoption of guidance to support the development of country- or region-specific plastic waste management plans and infrastructure as well as enabling policies** (e.g., Extended Producers Responsibility (EPR)). The establishment of regulatory top-down measures in national action plans should be avoided to allow flexibility and adjustment to local circumstances, as well as coordination with other national action plans, e.g., on marine litter, climate change. For example, mandatory End of Waste (EoW) criteria for specific plastic wastes should not be part of national action plans. Instead, guidelines would support the uptake of the circular economy.
- **The control of waste shipment to be considered exclusively under the remit of the Basel Convention**, including measures that are designed to prevent illegal waste shipments, such as enforcement of existing transboundary waste shipment laws, e.g., controls and inspections. This is to avoid duplication and/or inconsistencies on the control of waste shipment. In addition, bans may be counterproductive for countries (e.g., Small Island Developing States) that do not have in place adequate infrastructures for the Environmentally Sound Management (ESM) of waste.

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<sup>1</sup>The CPA aims to boost the EU market for recycled plastics to 10 million tonnes by 2025. The alliance covers the full plastics value chains and includes 300 organisations representing industry, academia and public authorities.

- **The establishment of a globally led system to promote environmentally sound management of waste.** For example, a certification platform for recycling facilities run via an independent and global organisation that sets the rules to audit and verify practices in relation to waste (e.g., Basel Convention, standardisation body such as ISO, ISCC) and standard specifications for plastic waste combined with standardised testing and verification protocols.

## Downstream measures

- **The establishment of a sustainable financing mechanism**, including:
  - Development of assistance and capacity building
  - Data collection to understand the scope and needs at all government levels
  - Public-Private partnerships
- **The adoption of effective EPR-like schemes, underpinned by enabling national/regional policies** (e.g., mandatory recycling or recycled content targets to drive the re-design of products and increase recyclability to enable a circular economy). More concretely, such schemes should:
  - Be designed for local conditions to ensure solutions that meet the needs and economies of their area and help build sustainable business models that benefit local communities, including the informal workers/waste collectors. Systems designed in developed countries may not be effective in developing countries.
  - Engage the informal waste picker community, if relevant, as well as the private sector during the design process.
  - Be material neutral to ensure participation across all packaging types and address all materials in the waste stream, not just plastic.
  - Include strong legislative or regulatory frameworks to address free riders.
  - Ensure proper oversight and monitoring.
  - Work with and empower Producer Responsibility Organizations (PROs)
  - Develop a “ring-fenced” program so funding cannot be diverted for other purposes.

We do not support taxes or fees (e.g., on plastic, packaging or recycling) which are only marginally able to drive consumer behaviour, as they are not assessed at the point where a consumer can decide how to dispose of a product. A tax on plastic could also lead to plastic deselection or substitution, with unintended consequences such as increase in food waste and GHGs emissions. Finally, unless directly allocated into waste management infrastructures, a tax deposited into general funds will inhibit innovation in design for recycling and investments in new recycling technologies.

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### Please contact:

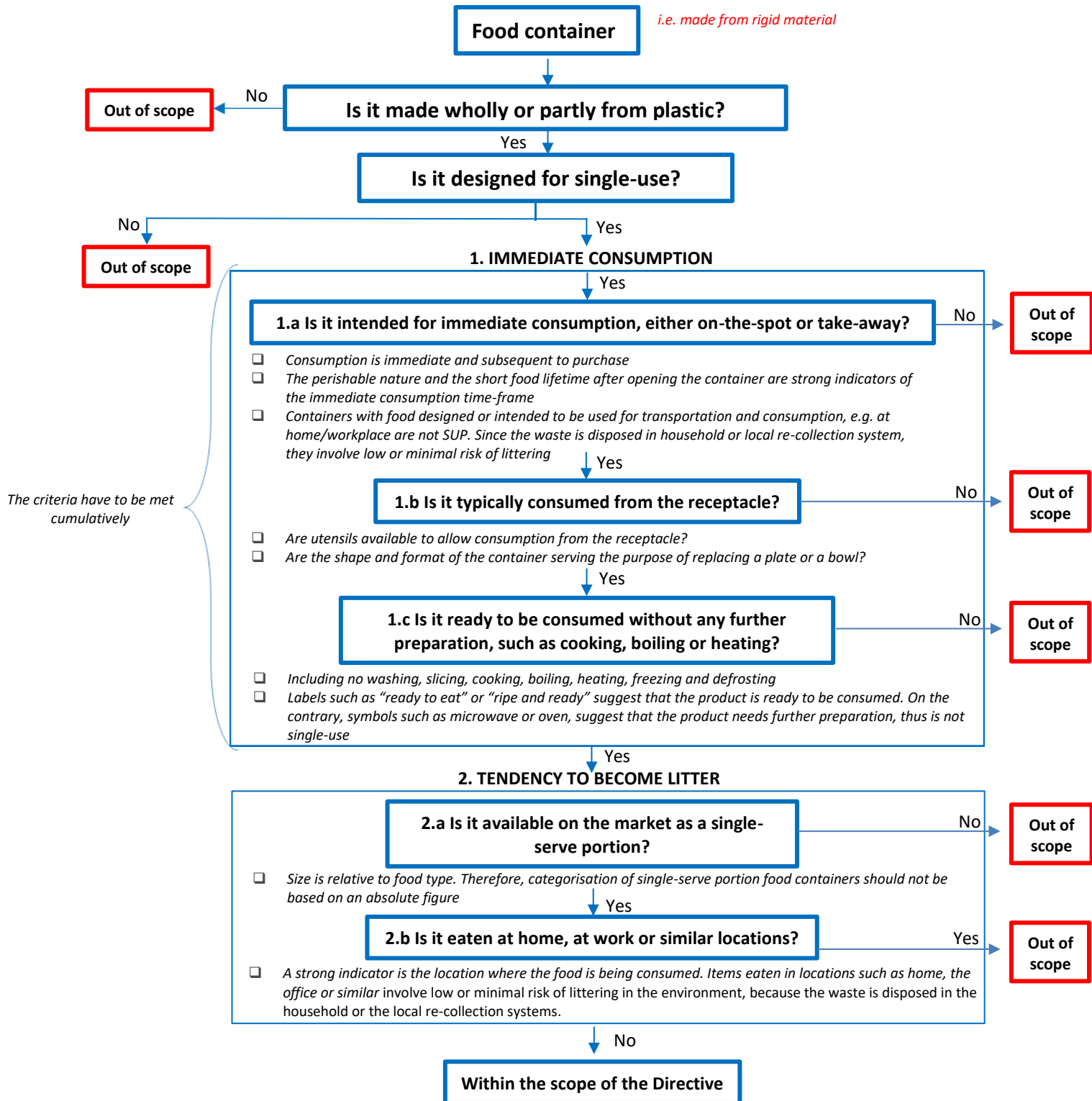
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## Annex - Plastics Europe Decision trees on Single-Use Plastics

### Decision tree – Is this a single-use plastic food container?

Source: PlasticsEurope



## Decision tree – Is this a single-use plastic (crisp) packet or (sweet) wrapper?

Source: PlasticsEurope

