The Global Plastics Treaty to end plastics pollution offers a big opportunity to accelerate the circularity transition of necessary plastics like flexible packaging to a circular economy at a global scale

Legislation is needed to keep materials circulating in the economy and to...
- set a level playing field so that companies investing in design-for-circularity are not put at a competitive disadvantage.
- ensure that the basic steps to achieve a circular economy (which will not be driven by market forces alone) are taken and sustainably funded.

INC-4 should focus on
- provisions related to product design requirements, extended producer responsibility, and waste management. These elements have the greatest potential to deliver positive change as urgently as we need it.
- consolidating the main provisions and general principles in a revised draft text. Sector specific criteria should be amended in technical annexes after the Treaty's adoption—starting with defined priority sectors including packaging.

1. Recommendations for Intergovernmental Negotiating Committee negotiators and stakeholders

CEFLEX —The Circular Economy for Flexible Packaging initiative— is a supporter of the Business Coalition for a Global Plastics Treaty. We support the Coalition’s proposals on product design, EPR and waste management. From a flexible packaging perspective, we are calling to include the following provisions in a reviewed draft text version (based on the UNEP Secretariat's version dated March 2024).²

1. **Fostering design for circularity**: Part II 5.a

The Treaty shall mandate harmonised design-for-circularity criteria for all plastic products, including flexible packaging, and oblige all Parties to implement and enforce them. We recommend that the Treaty should oblige Parties to adopt national legislation requiring economic operators to meet basic design-for-circularity criteria harmonised at the international level. The “Golden Design Rules for Plastic Products”³ published by the Consumer Goods Forum could be one basis for these criteria.

Sector specific requirements and relevant standards on design for recycling should be included in technical annexes starting from plastic products that are short-lived such as packaging. These should be based on existing evidence-based guidelines such as the CEFLEX Designing for a Circular Economy guidelines for the mechanical recycling of polyolefin-based flexible packaging which are currently being used as a reference document in the drafting of European (CEN) design-for-recycling standards and are the result of a value chain consensus.

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2. **EPR and waste management**: Part II.7

The Treaty shall oblige the set-up of sustainably funded EPR systems to increase collection and recycling rates as well as the recyclability of short-lived plastic products, including flexible packaging. The Treaty text should include the following basic principles: EPR fees shall finance tasks in scope of the EPR scheme following the net-cost principle (ringfencing of fees), EPR applies to all packaging including flexibles and collection must fully cover the area of responsibility (no cherry-picking). CEFLEX shared its expertise and experience in its ‘EPR ‘Criteria for Circularity’.

3. **Waste management**: Part II.9

The end market demand in recycled materials is the foundation to a robust strategy for growth in recycling capacities and capabilities. In Europe, our analysis to identify and develop end markets for recycled content in both flexible and rigid applications in a range of sectors is helping establish a complete picture of the business opportunities in the circular economy. We believe our demand-driven model can be adapted and applied in all global regions. If regulation mandates the use of recycled content and the quality of the mechanically recycled material can serve the needs of various applications.

2. What is CEFLEX?

The **Circular Economy for Flexible Packaging (CEFLEX) initiative** is a collaboration of around 200 companies, associations and organisations representing the entire flexible packaging value chain. Together we are working to make consumer flexible packaging circular.

The cornerstone of the CEFLEX initiative is based on giving all flexible packaging waste items a positive economic value that enables their collection and return to the economy. This is key to preventing them leaking into the natural environment. We are committed to doing this by redesigning consumer flexible packaging and ensuring an effective but appropriate collection and recycling infrastructure. Our work shows that this low cost and material efficient packaging format can and is increasingly being cost-effectively collected and recycled to supply valuable new markets where it is used in place of virgin plastics again and again.

CEFLEX is a UNEP-accredited organisation able to attend the INC negotiations. We have endorsed the vision statement of the Business Coalition for a Global Plastics Treaty, convened by WWF and the Ellen MacArthur Foundation and support The Consumer Goods Forum’s recommendations for a Global Plastics Treaty.

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*Downloadable resources | CEFLEX | A circular economy for flexible packaging.*
3. Resources

CEFLEX has published Designing for a Circular Economy guidelines[^1] for the mechanical recycling of polyolefin-based flexible packaging. These evidence-based guidelines could serve as a basis for globally-harmonised flexible packaging design criteria set in a technical annex to the Treaty. They are currently being used as a reference document in the drafting of European design-for-recycling standards and are the result of a value chain consensus.

Flexible packaging is necessary, recyclable and increasingly recycled

- Flexible packaging is used to protect essential products such as food, medicines and personal care products.
- It helps to make these products available in a safe and affordable way.
- It is recyclable with mechanical infrastructure used commonly and at scale around the world.

Flexible packaging is recyclable and recycled using mechanical infrastructure used commonly and at scale around the world.

[^1]: [https://guidelines.ceflex.eu/](https://guidelines.ceflex.eu/)