

Wednesday, 23 September 2026

Submitted by: Australian Beverages Council Limited
UNEP Accredited Observer

Dear Chair,

RE: Observer comment ahead of the second informal in-person meeting of the HODs to the INC

The beverage industry supports a treaty that sets a high level of long-term ambition while remaining workable and effective from the outset. Greater global alignment on measures to prevent and reduce plastic pollution will be important to provide businesses with the regulatory certainty needed to support investment, innovation and efficient operation across multiple jurisdictions.

How can Parties cooperate in the implementation of effective waste management policies, taking into account the different national circumstances and needs?

Parties can support more effective waste management by recognising extended producer responsibility (EPR) as an important policy tool and encouraging its implementation in a manner that reflects national circumstances, existing infrastructure and regulatory maturity.

While EPR systems will necessarily differ between jurisdictions, common principles can help improve consistency, transparency and performance. These should include:

- producer-led, not-for-profit management structures;
- government-enabled frameworks with clear policy objectives;
- transparent and accountable governance;
- fees linked to the true costs of operating the system;
- incentives for circular design; and
- measurable collection and recycling targets.

Where producers are responsible for achieving recovery outcomes and meeting the associated costs, they should have appropriate oversight of system design, operation and performance. EPR systems should also be structured to deliver measurable environmental, social and economic outcomes efficiently and accountably, with long-term financial sustainability supported by revenues raised through the system being retained and applied to the delivery of its operational and environmental objectives.

Cooperation between Parties could further support implementation through the exchange of best practice and technical expertise, greater alignment of relevant definitions and data-

reporting approaches, and the development of common performance principles. This should be pursued in a way that:

- recognises differing national circumstances, infrastructure and regulatory maturity;
- supports greater interoperability and consistency between systems where practical; and
- enables new EPR arrangements to complement, rather than duplicate, mature and successful waste management systems already operating within a jurisdiction.

Taken together, these approaches can help strengthen the effectiveness of EPR while supporting greater consistency between jurisdictions and preserving the flexibility needed to respond to different national circumstances.

Which principles and approaches could be useful in guiding the effective implementation of the instrument, and how could these be best reflected in the instrument?

Effective implementation of the instrument should be guided by principles that promote circularity, regulatory coherence and practical implementation across different national circumstances.

Policies should encourage packaging design that:

- supports circular outcomes including design for recyclability;
- retention of materials at their highest practical value for as long as possible; and
- compatibility with existing collection and recycling systems.

For beverage packaging, these principles are particularly relevant to closed-loop applications such as bottle-to-bottle recycling, where recovered food-grade material can be returned to equivalent high-quality uses. Maintaining material at this level of quality supports stronger circular outcomes and helps preserve the value of recovered material within the system.

Harmonisation is important to effective implementation. Common definitions should be prioritised, supported where appropriate by greater alignment in measurement methodologies, data collection and reporting. At the same time, implementation should recognise differences in national waste management systems and build on effective existing frameworks rather than imposing approaches that may not be compatible with local infrastructure.

Regulation should also take an evidence-focused, risk-based, proportionate approach informed by robust scientific assessment. This is particularly important where measures may affect material or chemical choices, to ensure that environmental and human health objectives are pursued in a way that is scientifically grounded and supports coherent implementation across jurisdictions.

Finally, the instrument should reflect a “start and strengthen” approach. Establishing a workable and effective framework at the outset, with mechanisms that allow it to evolve over time as evidence, technology and implementation experience develop. This approach can support both early action and increasing ambition over the longer term.

Concluding Remarks

The Australian Beverages Council Limited supports an instrument that is ambitious in its long-term vision, practical in its initial implementation and capable of strengthening over time. In our view, the most effective and achievable outcome is a framework that establishes the essential foundations for coordinated action across the full life cycle of plastics, while providing clear pathways for measurable progress through future Conferences of the Parties.

A “start and strengthen” approach can provide the basis for greater harmonisation across markets, stronger regulatory certainty and sustained investment in circular solutions. To the extent possible, the instrument should also build on and remain coherent with relevant existing multilateral agreements and frameworks that already address aspects of plastic product design, chemicals, waste management and recycling, helping to minimise duplication and support a durable and effective global response to plastic pollution.

We appreciate the opportunity to contribute to this process and thank the Chair, Secretariat and Heads of Delegation for their continued work to advance the negotiations.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Geoff Parker".

Geoff Parker
Chief Executive Officer