

WRITTEN VIEWS IN ADVANCE OF THE SECOND INFORMAL IN PERSON MEETINGS OF HEADS OF DELEGATION

Intergovernmental Negotiating Committee on Plastic Pollution

AMERICAN FUEL & PETROCHEMICAL MANUFACTURERS' COMMENTS

Bangkok, 27-30 September 2026

Organization: American Fuel & Petrochemical Manufacturers

Status: Accredited Observer Organization

I. Introduction

American Fuel & Petrochemical Manufacturers (“AFPM”) welcomes the opportunity to provide written views on the guiding questions for the second informal in-person meeting of Heads of Delegation to the Intergovernmental Negotiating Committee on Plastic Pollution to be held in Bangkok, September 27-30, 2026.¹ AFPM understands the set of guiding questions² are intended to support delegations in preparing for the discussions, in which delegations will work to identify interlinkages and explore possible landing zones to inform the development of the second iteration of the “Aid to Negotiations.” In support of that effort, AFPM offers the following for consideration.

II. AFPM’s Interest in the Global Agreement on Plastic Pollution

AFPM is the leading trade association representing manufacturers of petrochemicals that are essential building blocks for plastic products that improve the health, safety, and living conditions of humankind and make modern life possible. AFPM members are committed to sustainably and efficiently manufacturing petrochemicals and derivatives for plastics that growing global populations and economies need to improve their daily life. Our members are a critical portion of the early supply plastics chain and can provide critical expertise that will help craft an effective agreement.

AFPM and our members support the development of an ambitious, effective and implementable global agreement focused on ending plastic pollution while preserving the essential benefits plastics provide to society. The pathway to convergence is a global framework that establishes common objectives, principles, assessment tools and reporting expectations, while

¹ See [“Call for written views from accredited observer organizations in advance of the second informal in-person meeting of Heads of Delegation to the INC on Plastic Pollution”](#) published September 11, 2026.

² See [Guiding questions by the Chair on the second informal in-person meeting of Heads of Delegation to the INC, 27 – 30 September 2026, Bangkok, Thailand, 2026.](#)

empowering countries to determine the policies best suited to their national circumstances through National Action Plans.

III. Cluster A: National Plans, Reporting, Implementation & Compliance, Information Exchange, and Effectiveness Evaluation

A. Question 1: What purposes are National Plans expected to serve as a contribution to the achievement of the objectives of the instrument?

AFPM supports National Action Plans (“NAPs”) that serve as the primary vehicle for implementation, translating common global objectives into nationally appropriate actions that reflect countries’ different circumstances, infrastructure, capabilities, and existing regulatory systems. NAPs should provide countries with flexibility to determine how to implement the agreement’s objectives rather than prescribing identical measures globally because regional circumstances and access to waste-management infrastructure differ substantially among countries. National Plans should also promote innovation and investment by providing clear national priorities and predictable implementation frameworks.

B. Question 2: How could provisions on reporting, implementation and compliance, information exchange, and effectiveness evaluation support the overall implementation of the instrument, and what is the relationship between these articles?

AFPM supports provisions that function as a single implementation cycle for measuring progress and improving implementation, not as a mechanism for prescribing uniform national policies. This can be done by establishing common reporting metrics directly tied to the agreement’s objective while maintaining proportionality to national capabilities. Information exchange will then allow countries to identify best practices, policies, and technologies they see fit. Compliance should be facilitative through recommendations, assistance, or capacity-building to help countries meet their commitments. Effectiveness evaluation should assess collective progress toward achieving the agreement’s objectives, while helping Parties consider how the instrument can evolve overtime. However, effectiveness evaluation should not allow for future COP decisions to become an indirect mechanism for imposing substantive obligations that Parties did not negotiate in the agreement.

C. Question 3: What will be the role of information exchange in the overall implementation of the instrument and how can it contribute to its effectiveness?

Information exchange should serve to accelerate implementation by allowing countries to share successful approaches, technologies, data and regulatory experience rather than reinvent solutions individually. Specifically, information exchange should help Parties build upon established regulatory systems and information-sharing initiatives.

IV. Cluster B: Releases & Leakages, Existing & Legacy Plastic Pollution, Plastic Waste Management, Plastic Products Design, and Plastic Products

- A. Question 1: What considerations should guide decisions on determining which plastic products will require possible global measures, actions or cooperation?*

AFPM does not view global measures on plastic products as within the scope of the agreement. AFPM supports product design evaluation criteria which governments can apply through their National Action Plans. Measures should be based on objective, science-based criteria that evaluate plastic applications and their actual risk of becoming pollution, while considering societal benefits, alternatives, circularity potential and national circumstances. The agreement could recognize that chemicals, polymers, and additives materials are highly regulated and covered under other international agreements and reference them appropriately. The focus of this agreement should be on plastic products that become pollution.

- B. Question 2: What type of enabling factors should be considered to address existing and legacy plastic pollution, including the process to identify and evaluate the locations or accumulation zones and subsequent remediation efforts?*

Existing plastic pollution efforts should prioritize locations where actions can deliver meaningful environmental benefits and should be supported by sound data, appropriate technology, adequate financing and clear prioritization criteria. Furthermore, the agreement should distinguish between prevention of pollution and remediation of historical pollution, as long-term effectiveness ultimately requires preventing new leakage by improving collection and waste management, rather than prioritizing cleanup once pollution has occurred.

- C. Question 3: How can Parties cooperate in the implementation of effective waste management policies, taking into account the different national circumstances and needs?*

AFPM supports increasing recycled content in products, enabled through multiple recycling technologies, consistent with AFPM's support of market-based technology adoption. Expanding access to effective waste management should be one of the agreement's central implementation priorities. The best approach for this agreement is to establish technology-neutral, common waste management principles while preserving national flexibility. This approach will likely attract broad participation and foster innovation as it enables multiple recycling technologies. Investment in waste management should be encouraged, especially within the private sector. The agreement will do so by avoiding trade barriers that prevent recyclable materials from reaching appropriate recycling infrastructure.

V. Cluster C: Capacity-building, Technical Assistance, Technology Transfer, including International Cooperation, Financial Resources & Mechanism

- A. Question 1: What elements must be considered to ensure that all available financial sources, including public finance, are effectively mobilized for the implementation of the instrument?*

Public financing alone will not be sufficient to ensure effective mobilization of financial resources for the implementation of the instrument. The scale of the waste-management challenge

requires mobilizing all appropriate sources of capital, including domestic public finance, multilateral resources, private investment and nationally appropriate financing mechanisms. Specifically, funding should address early-stage barriers by supporting capacity building, technical assistance, feasibility studies, and early-stage project development in general.

- B. Question 2: What role should the private sector have in facilitating the mobilization of financial resources, capacity building and technical assistance, and what elements could be considered under the financial mechanism to promote such a role?*

The private sector should be treated as an implementation partner that brings capital, technology, operational expertise and innovation needed to scale circularity and increase recycling. The private sector can be most effective in supporting infrastructure investment, developing and commercializing recycling technologies, technical expertise and training, and fostering public-private partnerships. Mechanisms in the agreement should leverage rather than displace private investment by laying the groundwork for a stable regulatory framework and functioning markets for recycled materials to attract long-term capital.

- C. Question 3: What provisions related to technology transfer could foster international cooperation, considering the capacity differences between countries?*

The agreement should promote access to appropriate technologies and technical expertise while preserving incentives for continued private-sector innovation and investment. Therefore, cooperation should be voluntary and mutually agreed upon while preserving the protection of intellectual property to attract private-sector investment. Provisions should also focus on fostering partnerships between governments, companies, and research institutions. It is especially important that provisions support technology neutrality to recognize that appropriate technologies will differ across countries.

VI. Cluster D: Preamble, Objective, Principles & Approaches, Definitions, Just Transition, Public Information, Awareness, Education, & Research, Secretariat, Final Provisions

- A. Question 1: 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?*

Principles should guide implementation without becoming independent sources of new or undefined obligations. The agreement should recognize the societal benefits of plastics and their essential applications while addressing the environmental consequences of mismanaged plastic waste. Therefore, a science- and risk-based approach to policy development which recognizes national circumstances and capabilities while maintaining technology and material neutrality is most useful in guiding the implementation of the instrument. Effective solutions should be grounded in lifecycle thinking, promote circularity, and encourage innovation to advance both environmental and economic sustainability. Policies should be designed to avoid unintended consequences and foster collaboration across the value chain.

B. Question 2: How can actions related to public information, awareness, education, and research support implementation?

Better information and research can improve consumer participation, policymaking and investment while accelerating the development of and adoption of more circular solutions. Specifically, better information and research can foster appropriate disposal and recycling behavior, collection-system participation, and recycling innovation. However, information should be scientifically accurate, practical, interoperable, and designed to avoid duplication of existing regulatory disclosure requirements.

C. Question 3: Considering the progress achieved so far in the discussions related to issues such as the Secretariat and definitions, does the current formulation in the Aid to Negotiations reflect the level of detail required?

Definitions should be clear enough to provide certainty and consistent interpretation while avoiding unnecessary complexity or expansion beyond the clearly defined and agreed scope of the agreement. Establishing a clear scope is essential to ensure that Parties have a common understanding of what the agreement does and does not cover and that definitions appropriately support, rather than broaden, that scope. This can be achieved by prioritizing existing internationally recognized definitions where possible and avoiding overlap or inconsistencies with existing agreements. The existing definitions are appropriate, as they do not attempt to define concepts that are more appropriately determined at the national level. Terms that determine or trigger substantive obligations should be clearly defined and carefully aligned with the agreement's scope so they do not inadvertently create or expand regulatory obligations.

Similarly, the Secretariat should have clearly defined administrative functions and transparent responsibilities, with no independent authority to create substantive obligations, reinterpret the agreement's scope, or extend its application beyond what has been expressly agreed by Parties.

VII. Conclusion

AFPM appreciates the opportunity to provide these views and remains committed to supporting the development of an effective, implementable global agreement to end plastic pollution. As negotiations move toward INC 5.4, countries should build on the progress made to date and continue working constructively to identify areas of common ground and seek practical pathways toward resolving remaining issues. INC 5.4 presents an important opportunity for Parties to bring this process to a successful conclusion, and maintaining a spirit of cooperation and compromise will be essential to finalizing the agreement. We look forward to continued engagement with Parties and stakeholders as negotiations advance.