



September 23, 2026

**Intergovernmental Negotiating Committee on Plastics Pollution:
Written Views from Accredited Observer Organizations**

The Biodegradable Products Institute (BPI) is North America's leading authority on compostable products and packaging, certifying over 50,000 products from compost collection bags to food containers. For more than two decades, BPI has given consumers confidence in compostability claims with the backing of science-based standards, while enabling authentically sustainable choices for brands and packagers. BPI champions a systems-wide transition to the circular bioeconomy through rigorous testing, policy advocacy, and industry collaboration to build the infrastructure for a world without organic waste. BPI is a non-profit 501(c)(6). To learn more, visit www.bpiworld.org and follow us on LinkedIn.

BPI appreciates Chair Ambassador Julio Cordano's efforts to facilitate negotiations and the Chair's efforts to identify areas of convergence and practical solutions ahead of INC-5.4. Plastic pollution, food-waste management, and soil health are interconnected challenges addressed across relevant multilateral environmental agreements and the United Nations Sustainable Development Goals. Organic recycling through composting can help address these challenges by diverting food scraps from disposal, reducing conventional-plastic contamination, returning valuable organic matter to soils, and providing an appropriate recovery pathway for certain food-contact products and packaging that cannot practically be reused or recycled.

BPI offers the following responses based on our experience with compostability standards, certification, organic recycling, food-contact packaging, and extended producer responsibility.

CLUSTER A: IMPLEMENTATION

Question 1: What purposes are National Plans expected to serve?

National Plans should translate the instrument's objectives into measures suited to each country's infrastructure, markets, and waste-management needs. They should preserve space for innovation and allow countries to deploy solutions that fit national and regional circumstances. For organic waste and certified compostable products, plans could:

- Establish objectives for food-waste reduction and organic-waste diversion.
- Identify appropriate applications for compostable products, particularly food-contact applications likely to be contaminated with food and unsuitable for reuse or conventional recycling.
- Assess collection, composting, labeling, certification, education, and processing needs.
- Promote local or regional composting systems for food scraps and associated certified compostable packaging, which can support local processing and reduce negative impacts associated with exporting materials to distant processing facilities.



- Encourage domestic manufacturing, agricultural markets, rural economic development, and investment in waste-management infrastructure where compostable biomaterials are appropriate.
- Prevent misleading biodegradability and compostability claims.
- Coordinate producers, governments, collectors, composters, farmers, standards bodies, and certifiers.

The instrument should establish clear expectations while preserving national flexibility to determine which materials, applications, and recovery systems produce the best environmental outcomes. At a minimum, certified compostable products should not be blocked or discouraged where they support food-waste collection, regional composting, and community organics-management goals.

Questions 2 and 3: Reporting, evaluation, compliance, and information exchange

Reporting and information exchange should help Parties measure progress without unnecessary administrative burdens. Relevant information could include:

- Organic waste generation, collection, and diversion rates.
- Composting infrastructure and facility acceptance of compostable products.
- Contamination levels in recycling and organic waste streams.
- Applicable standards, certification requirements, and labeling systems.
- Markets and quality requirements for finished compost.
- The contribution of compostable products to food-waste diversion.
- Effective public education practices.

Reporting should distinguish compostable products from conventional plastics and products making unverified biodegradability claims. Information exchange should also facilitate the sharing of standards, testing methods, certification practices, collection models, processing experience, and research.

CLUSTER B: PLASTIC PRODUCTS AND WASTE MANAGEMENT

Question 1: What considerations should guide decisions on plastic products requiring possible global measures, actions, or cooperation?

Global measures should distinguish certified compostable products from conventional plastics and products making unverified “biodegradable” or “compostable” claims.

The presence or origin of a polymer should not, by itself, determine how a compostable product is treated. Parties should apply feedstock-agnostic, science-based, and performance-based criteria that consider whether:



- The finished product is independently certified to recognized compostability standards.
- It is clearly labeled for its intended recovery pathway.
- It supports food-scrap collection and diversion.
- It is likely to be food-contaminated and unsuitable for reuse or conventional recycling.
- It is designed for controlled composting and compatible with receiving local facilities.
- It meets requirements protecting compost quality, human health, and soil health.
- Appropriate composting infrastructure is available or under development.

Compostable products should not automatically be included in restrictions, reductions, or phaseouts designed for conventional plastics. Parties should retain the ability to permit them in appropriate applications, particularly where they facilitate food-waste collection and organic recycling. In Article 3 and any related annexes, criteria, or implementation guidance, alternative materials such as compostable products should be permitted as appropriate alternatives to products targeted for phaseout or reduction where reusable options are impractical and where products meet rigorous performance and safety standards.

The instrument should establish these distinctions while preserving national flexibility based on local collection systems, processing infrastructure, and organic-waste-management needs. This approach would avoid unintentionally restricting beneficial applications, support continued innovation, and recognize composting as a recovery pathway alongside reuse and conventional recycling.

Question 3: How can Parties cooperate in implementing effective waste-management policies?

International cooperation should help countries manage certified compostable products through appropriate organic-recycling pathways, regardless of material feedstock. Cooperation could include:

- Recognizing composting as a distinct waste-management pathway uniquely capable of being managed in local communities at all levels: large or small scale.
- Aligning recognized compostability standards and certification systems to facilitate trade in reliable products and foster local innovation for product and material development.
- Developing consistent labeling and identification principles.
- Sharing expertise on collecting and processing food scraps with certified compostable products.
- Supporting infrastructure, facility testing, processing trials, and operator training.
- Sharing approaches to contamination reduction and consumer education.

Common standards and clear labeling can facilitate trade, improve consumer understanding, and protect recovery systems. Cooperation should also support regional composting models that allow food scraps and associated certified compostable packaging to be processed locally



where feasible, reducing reliance on exporting materials to distant processing facilities and supporting local infrastructure development.

CLUSTER C: FINANCING, CAPACITY BUILDING, AND TECHNOLOGY TRANSFER

Question 2: What role should the private sector have?

The private sector should be an active implementation partner and share responsibility for the end-of-life impacts and management costs of products placed on the market. Extended producer responsibility can mobilize private resources, but obligations and fees should reflect differences among products and recovery pathways. Eco-modulation should consider verified recyclability or compostability, intended application, actual management costs, and demonstrated environmental outcomes. Because compostable products and packaging represent a distinct recovery pathway alongside reuse and conventional recycling, EPR systems should be designed to support scientifically verified compostable solutions.

EPR revenues associated with certified compostable packaging should support:

- Organic waste collection.
- Composting infrastructure and equipment.
- Facility testing and processing trials.
- Contamination reduction and education.
- Market development for finished compost.

CLUSTER D: PRINCIPLES, DEFINITIONS, INFORMATION, AND RESEARCH

Question 1: Which principles and approaches should guide implementation?

BPI recommends that implementation be guided by the following principles:

- Science and performance-based decision-making.
- Material and technology neutrality, with distinctions based on verified performance, chemical safety, intended use, and recovery compatibility.
- Recognition of reuse, mechanical recycling, and organic recycling as distinct and complementary pathways.
- Consideration of the full food-packaging system, including food safety, food waste, collection, processing, soil benefits, and infrastructure.
- Prevention of misleading claims and independent verification of compostability.
- National flexibility reflecting infrastructure and waste-management needs.
- Clear language that encourages countries to adopt and promote compostable products where they help manage food waste and associated packaging regionally, while ensuring such products are not blocked or discouraged when they meet rigorous performance and safety standards.
- Producer responsibility for end-of-life management.



- Protection of human health and the environment.

These principles should be reflected in the instrument where they are necessary to ensure consistent interpretation and legal predictability. Detailed testing protocols, technical criteria, and implementation guidance can be developed or updated through subsequent decisions of Conference of Parties.

Question 2: How can public information, awareness, education, and research support implementation?

Clear public information is essential to effective reuse, recycling, and composting systems. The instrument should encourage Parties to:

- Require accurate, substantiated claims that distinguish compostable products from products described only as biodegradable, or that do not meet internationally recognized compostability standards, encouraging the use of third-party certifications.
- Support consistent labeling of intended recovery pathways.
- Coordinate education among producers, governments, waste operators, composters, purchasers, food-service operators, and consumers.
- Tailor disposal instructions to locally available systems.
- Improve understanding of the relationship among packaging, food waste, composting, soil health, and plastic pollution.

Research should evaluate the complete system rather than considering packaging in isolation. Assessments should account for avoided food waste, edible food recovery, food-scrap diversion, contamination, collection behavior, processing performance, finished-compost quality, soil benefits, and local infrastructure.

Question 3: Does the current treatment of definitions provide sufficient detail?

Definitions should be sufficiently clear to establish scope and ensure predictable implementation. The instrument should provide the following core distinctions:

- “Recycling” should expressly include organic recycling, including composting.
- “Composting” should mean a managed biological process under controlled conditions and be distinguished from degradation in the open environment.
- “Compostable product” should mean a product demonstrated to meet recognized compostability standards under specified conditions.
- “Biodegradable,” “biobased,” and “compostable” should not be treated as interchangeable.
- Definitions should distinguish certified compostable products from conventional plastics based on their verified performance and intended recovery pathways.



- “Alternative materials” should include compostable products, regardless of feedstock.
- Industrial and home composting should be recognized as involving different conditions

CONCLUSION

BPI supports an effective and implementable instrument that reduces conventional plastic pollution while preserving national flexibility, encouraging innovation, and recognizing scientifically verified recovery pathways.

Certified compostable products provide a distinct and valuable pathway for managing food scraps and associated packaging through organic recycling. The instrument should recognize compostability based on the verified performance of the finished product, regardless of whether its feedstock is renewable, fossil-derived, or mixed. It should preserve the ability of countries and communities to promote materials that serve their local organics-management goals, while encouraging investment in innovations, infrastructure development, and public education systems. By recognizing composting alongside reuse and conventional recycling, the instrument can support innovation, strengthen regional circular economies, and advance the transition toward a world without organic waste.