

Written views from Fidra in advance of the second informal in-person meeting of Heads of Delegation (HODs) to the INC, Bangkok September 2026

Introduction: Why plastic pellet pollution is best addressed by the global plastic treaty

We welcome the opportunity for stakeholder organisations to provide views in response to the Aid to Negotiations text and guiding questions, issued by the Chair of the Intergovernmental Negotiating Committee (INC) ahead of the meeting of Heads of Delegation September 2026. As an environmental NGO working to end plastic pellet pollution, we are greatly concerned by the removal of text in the Aid to Negotiations (that was previously present in Article 6: Releases and Leakages), relating to specific obligations for addressing plastic pollution from the whole lifecycle of plastic including plastic feedstocks, including pellets, flakes and powders (collectively referred to as plastic pellets). In previous texts stronger more specific commitments were drafted in relation to plastic pellets that would have made a meaningful contribution to preventing global plastic pollution. In previous negotiations and texts there was notable consensus and ambition to address plastic pellets in the final treaty text, as it has been widely recognised that plastic pellets are a global, transboundary pollutant that is produced and released into the environment by the plastic industry supply chain and there are pollution prevention measures readily available. We strongly urge the inclusion of specific language and obligations within the treaty text in relation to addressing plastic pellet pollution.

Plastic pellets (nurdles), flakes and powders of primary and/or recycled polymers are the plastic industry's feedstock. They are transported worldwide to make almost all plastic products. As virtually all the plastic that the text covers is made of pellets, flakes and powders, it is essential that pollution from pellets, flakes and powders themselves is specifically addressed in the treaty text as well as the pollution from products these pellets, flakes and powders are used to make. Each year over 445,000 tonnes of plastic pellets enter the environment from all stages of the global supply chain, due to mismanagement and mishandling, representing a major source of global microplastic pollution¹. In the time between UNEA 5.2 where the resolution to develop an international legally binding instrument on plastic pollution was adopted, and this latest Heads of Delegation meeting in September 2026, an estimated 2 million tonnes of plastic pellets will have been lost across the global plastic supply chain. 95% of this pollution was preventable had global mandatory measures been put in place.

¹ <https://hub.nurdlehunt.org/resource/oe-mapping-the-global-plastic-pellet-supply-chain-report-only/>

Pellet pollution is impacting biodiversity, communities and industries including tourism and fishing. Even countries that do not produce or use pellets are at risk of transboundary pollution due to pellets' mobility and persistence in the environment and international trade routes.

- Pellets spill into the environment at every stage of the global plastic pellet supply chain, on land and at sea, causing widespread pollution.
- Pellets are mistaken for food by wildlife, with plastic ingestion potentially leading to organ damage and starvation while introducing plastics into food chains.
- Pellets can leach, transport and adsorb harmful chemicals and pathogens in the environment creating a toxic cocktail.
- Microplastic fragments released as pellets age can enter human and animal tissues disrupting function. Chemical additives and microplastic have been linked to cancer in humans and hormone disruption in marine animals.

Pellet loss is global, pellet pollution is global, pellet loss prevention must be global and mandatory. While there are some examples of regulations to prevent pellet loss (e.g. European Union) and voluntary agreements in certain sectors (e.g. marine transport) there are no global mandatory measures to prevent pellet loss across the whole plastic supply chain.

This upstream, transboundary, cross sector pollution must be addressed by the Legally Binding Instrument on Plastic Pollution by reinstating specific language on plastic pellet loss prevention within Article 6 (Releases and Leakages) of the developing treaty text.

View on the guiding questions as starting point in Cluster discussions

Cluster A

N/A

Cluster B

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

Plastic pellets are been widely recognized as being a plastic product that is well suited to being addressed in the treaty text as they are a global, transboundary pollutant that is produced and released into the environment by the plastic industry supply chain, and there are pollution prevention measures readily available that can be implemented through global

mandatory measures and actions. The inclusion of upstream and microplastic sources of plastic pollution is imperative, to ensuring plastic pollution across the full plastic life cycle is addressed by a final treaty text. Plastic pellets represent a major source of upstream, primary microplastic pollution globally. Plastic pellet loss occurs at all stages of the global plastic supply chain (including: production, conversion, transportation via marine and terrestrial modes, recycling and handling at all points), across nations and jurisdictions, and is not specific to a unique sector. This means that a comprehensive global approach to pellet loss prevention is crucial in order to effectively address pellet loss across global supply chains and the full plastic lifecycle.

In order to prevent pellet loss throughout global supply chains, it is essential to retain specific obligations relating to plastic pellet pollution within Article 6 (Releases and Leakages). These obligations must apply across the full plastic life cycle and through out the plastic supply chain, and include: mandatory minimum requirements for pellet loss prevention, independent verification of implementation and monitoring for effectiveness. Additionally, guidelines must be adopted to support the implementation of this article.

The implementation of upstream pollution prevention measures are more cost-effective and successful than attempting to collect microplastics (including plastic pellets) once they have entered the environment. Research has shown that 95% of plastic pellet pollution can be prevented through mandatory measures implemented across the global plastic supply chain². Furthermore, inclusion of obligations in Article 6 to prevent pellet loss provides an opportunity to ensure a level playing field for stakeholders and actors across the global plastic supply chain, regardless of location or role.

A strong treaty is well placed to provide an overarching framework for coordinated international actions at all stages of the pellet supply chain, ensuring consistency, transparency and measurable continuity in practices, while complementing other maritime and terrestrial pellet policy developments.

To prevent pellet loss the treaty text must include:

- All plastic feedstocks (including primary, recycled, fossil fuel and biomass derived plastic in flakes, powder or pellet forms)
- All sectors & companies (including producers, converters, waste handlers, transporters and actors who handle pellets)
- Mandatory loss prevention measures with specific minimum requirements
- Requirements for independent standards and certification schemes to demonstrate compliance.

² <https://eunomia.eco/reports/investigating-options-for-reducing-releases-in-the-aquatic-environment-of-microplastics-emitted-by-products/>

As 95% of plastic pellet loss can be prevented with a mandatory global supply chain approach, the treaty text must enshrine the prevention hierarchy (prevention, containment, clean-up) with ecologically sensitive clean-up and restoration/ mitigation measures where needed.

Of additional importance is the definitions of plastics and plastic products under discussion. We support the following definitions in application to microplastics, including primary and secondary microplastics:

- **Microplastics are plastic particles smaller than 5 mm in size in any dimension.** No lower limit should be set, so the term covers particulate plastic matter in the nano-range as well.
- The definition **applies to all plastics regardless of feedstock:** i.e., plastics derived from fossil fuels, biomass, recycled content or a combination of these.
- **Primary microplastics** – produced and intended for use as plastics, 5 mm in size or less. These can include, but not limited to, microplastic ingredients (microbeads), plastic feedstocks such as plastic pellets, agricultural pesticide and fertiliser delivery systems.
- **Secondary microplastics** – result from intentional and unintentional degradation and fragmentation of larger plastic products, including but not limited to paints, vehicle tyres, synthetic fibers, fishing and aquaculture gear.
- **Plastic Pellets** - Plastic pellets means a mass of pre-formed moulding material, used as feedstock in plastic product manufacturing operations. Plastic pellets can be derived from primary (virgin) polymer and/or recycled polymer, including biobased plastic polymers. They are transported in various forms, including flakes, granules and powders and can be referred to as resin or nurdles.

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?

Articles in relation to identification, clean up and remediation must include reference to mechanisms for the remediation and compensation of communities, ecosystems and environments impacted by pellet pollution, including chronic, historic or on going pollution, disaster response protocols for future pellet spills and loss, and for accumulation zones, hotspots and recognising some of these are yet to be identified. The plastic industry including producers, converters, transporters and handler are all responsible for pellet pollution, and mechanisms for distribution of compensation and remediation funds from polluters must be included. An international fund supported by industry contributions from fees, levies and Extended Producer Responsibility mechanisms, would provide one such mechanism to operate the Polluter Pays Principle. This fund should be under the

instrument's authority for distribution of funds for remediation and compensation and accessible for communities and nations impacted by pellet pollution.

Identification, clean-up and remediation measures in suitable areas identified, should be undertaken in an ecologically sensitive and environmentally sound manner, using best available scientific and technological methods. It is important that communities of areas identified for potential clean up or remediation are included in the decision-making process regarding identification, clean up and remediation.

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

As recycling of plastics generates microplastics in the form of pellets, flakes and powders releases are estimated to increase in the future due to both primary production and recycling, establishing clear obligations for parties to reduce microplastic emissions (including plastic pellets) from waste management processes is crucial as part of effective waste management policies. By implementing mandatory minimum requirements to prevent pellet loss, independent verification and monitoring across the full plastic supply chain, release and leakages of plastic pellets from waste sources can also be addressed. Preventative measures are more cost-effective and much more feasible than attempting to collect microplastics once they have entered the environment, and should be applied to plastic waste management in order to address this source of microplastic pollution.

Cluster C

N/A