

GCCA Position Paper – UNEP Plastics Treaty

Recognising Co-processing as an Environmentally Sound Solution for Non-recyclable Plastic Waste under the UNEP Global Plastics Treaty

1. Introduction

GCCA, the Global Cement and Concrete Association, is the global voice of cement and concrete, leading the industry's efforts on innovation, sustainability and communicating the essential value of concrete.

GCCA strongly supports the ambition of the UNEP Global Plastics Treaty to end plastic pollution, accelerate circular economy systems and protect human health and the environment. This paper sets out how co-processing in cement manufacture, which is already recognised in the Basel Convention, aligns with these ambitions and has a key role to play in managing residual plastic waste that cannot otherwise be recycled.

2. The Role of Co-processing

For the Treaty to succeed, it must recognise a practical reality faced by many countries: not all plastic waste can be eliminated, reused or recycled in the near term. Large volumes of plastic waste remain contaminated, mixed, degraded, economically unrecoverable or located in regions where collection and recycling infrastructure are still developing. If these residual waste streams are not managed through environmentally sound pathways, they risk being landfilled, openly burned, dumped or leaked into rivers and oceans.

Co-processing in cement kilns offers an environmentally sound management solution for non-recyclable plastic waste (including waste that is not technically, environmentally or economically suitable for recycling), when operated under appropriate regulatory controls, Best Available Techniques (BAT) and Best Environmental Practices (BEP). It offers a distinct advantage over other disposal routes by using the calorific value of waste-derived fuels to replace fossil fuels, while incorporating the inorganic mineral fraction into clinker - the key ingredient of cement - and thereby avoiding a separate ash stream requiring disposal. In opposition to open burning or classical incineration with energy recovery, co-processing also offers the advantage of reducing greenhouse gas emissions. When non-recyclable plastic waste is used in cement kilns, it replaces primary fossil fuels and avoids disposal through landfill or incineration, thereby reducing overall greenhouse gas emissions.

3. Recognition of Co-processing in the Treaty

GCCA recommends that Parties to the Treaty recognise co-processing as a complementary, environmentally sound waste management solution for plastic waste that cannot be prevented, reused or recycled.

3.1 Residual Waste Only

Co-processing should be directed towards non-recyclable residual plastic waste streams that would otherwise be landfilled, incinerated, openly burned, dumped or leaked into the environment. It should not be used as a substitute for prevention, reuse or recycling.

Co-processing can also help countries manage residual fractions while they continue building collection, sorting and recycling capacity. It can create demand for waste segregation, pre-processing and material recovery infrastructure, helping to make the case for implementation of more formal waste management systems. Once such systems are implemented, co-processing can sit alongside recycling where it provides a solution for recycling residues and rejects as part of a more complete circular economy system.

3.2 Use at Regulated Sites

Co-processing is a highly regulated activity. Waste materials must undergo acceptance procedures, characterisation, quality control and permitting before they are used. Furthermore, cement kiln emissions are controlled through strict regulatory permits and monitoring requirements.

The inclusion of co-processing in the treaty should not be viewed as an unrestricted use of plastic waste in cement kilns. It must be a properly controlled regulated option for the management of residual non-recyclable waste. To ensure this is the case, GCCA proposes that recognition of co-processing by the Treaty is conditional on the following safeguards being in place:

- clear permitting requirements;
- pre-processing and quality control of waste inputs;
- exclusion of unsuitable waste streams;
- transparent emissions monitoring and reporting in accordance with applicable regulatory requirements;
- application of BAT and BEP;
- compliance with national and international environmental requirements;
- engagement with local communities.

3.3 Socially Responsible Implementation

In many countries, informal waste workers and waste picker communities play a central role in collecting and recovering recyclable materials. GCCA recognises that these communities can be directly affected by changes in waste policy and waste value chains.

For this reason, co-processing is a solution for residual, non-recyclable and low-value waste fractions. It should not divert materials that can be recycled and should not undermine livelihoods linked to recycling. Instead, co-processing can complement efforts to formalise waste systems, improve material recovery, reduce unsafe working conditions and create better organised waste management value chains.

4. Suggested Treaty Language

GCCA recommends that the Treaty include the following paragraph to reinforce the waste hierarchy, limit the scope to residual plastic waste, recognise national regulation and make the environmental safeguards explicit:

"Parties may recognise environmentally sound co-processing in properly controlled cement kilns as one of the available management options for residual plastic waste that cannot be prevented, reused or recycled, provided that such operations are conducted in accordance with applicable national regulations, relevant international guidance, Best Available Techniques, Best Environmental Practices, robust waste acceptance procedures and transparent emissions monitoring."

5. Intergovernmental Negotiating Committee on Plastic Pollution

The Intergovernmental Negotiating Committee on Plastic Pollution continues to progress its work through four clusters of pre-determined sets of topics as set out below.

Co-processing has a role to play in all of these areas and particularly in clusters A, B and C. In order to progress inclusion of co-processing in the treaty, GCCA calls on each cluster to consider the following points:

5.1 Cluster A

Recognise co-processing as an important and practical component of an integrated plastic waste management system. Including co-processing in the Treaty framework would give countries a regulated option to deal with residual, non-recyclable plastic waste. A proposal to include co-processing of plastic waste in national waste management plans would also help to develop local treatment capacities.

5.2 Cluster B

Co-processing in cement kilns, when properly controlled and applied to residual non-recyclable plastic waste, can help countries reduce open burning, landfill, uncontrolled dumping and environmental leakage. It can recover energy and mineral value, reduce reliance on fossil fuels and complement the development of stronger recycling systems. Co-processing of non-recyclable plastic waste is a solution for an effective reduction of greenhouse gas emissions in the country where co-processing takes place.

5.3 Cluster C

Co-processing in cement plants is a technology that exists in most countries, with available capacities for plastic waste treatment. It requires very limited financial investment for the collection and preparation for use, where local private investments are possible.

6. Conclusion

The UNEP Global Plastics Treaty must be ambitious enough to end plastic pollution and practical enough to be implemented by countries with very different starting points. Prevention, reuse and recycling must remain the foundation of the Treaty. However, for plastic waste that cannot be recycled, countries need access to environmentally sound and regulated treatment options.

Signed



Mr. Thomas Guillot

Global Cement and Concrete Association

Chief Executive Officer

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