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GO!PHA

**MATERIAL CHANGE.
NO MICROPLASTICS.**

GO!PHA Feedback on the Chair's Guiding Questions

Second Informal In-Person Meeting of Heads of Delegation, Bangkok, 27–30 September 2026

Overall Approach

GO!PHA welcomes the Chair's guiding questions as an opportunity to identify practical areas of convergence and bridging solutions for the next iteration of the Aid to Negotiations. We particularly see an opportunity to strengthen the link between upstream product and material measures, science-based assessment, waste management, and enabling conditions for implementation.

The guiding questions should allow the instrument to address plastic pollution at source while remaining responsive to developments in material science and to the different circumstances and capacities of Parties. In particular, measures concerning plastic products should be capable of distinguishing between materials and products according to their actual characteristics, risks, functionality and end-of-life performance, rather than relying solely on legacy material classifications. We see Cluster B as a key driver for this with discussions on products, product design, releases and leakages, legacy pollution and waste management provides an opportunity to establish an upstream framework under which safer and more sustainable substitutes and alternatives can contribute to achieving the objectives of the instrument, alongside reduction, reuse, recycling and improved waste management.

Recommendations for questions in the proposed clusters

Cluster B

- Releases and leakages
- Existing and legacy plastic pollution
- Plastic waste management
- Plastic products design
- Plastic products

Considerations for measures on plastic products and design

GO!PHA recommends that this determination rest on harmonised, science-based criteria for material and product assessment, rather than blanket classifications or legacy definitions. The assessment should consider the origin and composition of materials alongside functionality, human health and environmental impacts, hazard and safety, persistence, potential for microplastic and other harmful releases, exposure and leakage pathways, and appropriate end-of-life options. Chemicals of concern, including those present in additives and processing aids, should be considered as part of the same assessment.

Such an approach would allow measures to be directed towards products and applications according to their actual risks and characteristics, while recognising where redesign or material substitution can address those risks at source. This is particularly relevant where products are used in applications with potential for environmental release or where retrieval is difficult, and where a different material or design may perform the required function with lower persistence or other relevant impacts.

The framework should therefore enable the use of verified safer substitutes and alternatives as one of the upstream measures available to Parties. This should not create a blanket exemption for any category of material. Rather, alternatives should be subject to the same rigorous assessment of safety, functionality and environmental performance, while not being automatically subject to measures developed around the characteristics of conventional plastics where the evidence demonstrates materially different properties. This would provide a level playing field while allowing the instrument to remain responsive to developments in material science.

We see value in establishing the overarching criteria and principles in the instrument, while allowing detailed criteria, methodologies and verification procedures to be developed and updated through the appropriate scientific and technical process. This would provide sufficient predictability for implementation without making the instrument dependent on static classifications.

Factors to enable addressing legacy plastic pollution

Addressing existing and legacy pollution requires a stronger evidence base on the material and product characteristics associated with accumulation and leakage. Identification of accumulation zones should therefore consider the composition and origin of materials, relevant material properties, persistence and degradation behaviour, the presence of persistent chemicals or other substances of concern, and the pathways through which products and materials entered the environment.

This information can support Parties in determining appropriate remediation measures and prioritising action according to the risks associated with persistence and exposure to natural ecosystems and humans. It should also serve a preventive function. Where evidence shows that particular products, materials or applications are recurring sources of accumulation or harmful

leakage, that evidence should inform upstream measures, including product redesign, substitution or other measures to prevent further releases.

Building this evidence base will also support the development and refinement of life-cycle assessments and other assessment methodologies for products and systems intended to prevent or manage pollution.

Effective waste management

Effective waste management should support resource efficiency and safe circularity while recognising that appropriate end-of-life pathways will differ according to the material, product, use and national or regional infrastructure. Cooperation should therefore encompass reuse and recycling alongside other appropriate pathways, including organic recycling through composting or anaerobic digestion where relevant, and other safe treatment or recovery options.

This is particularly important as Parties consider materials with different origins and properties. A resilient system does not assume a one-size-fits all approach and enables the diversity of end-of-life pathways available and appropriate for all materials, including suitable substitutes and alternative materials that do not perform similarly like plastics at the end of their life. The discussions should therefore ensure that products and materials are directed towards pathways in which they can be safely managed and where possible, their value retained. At the same time, effective waste management cannot address the root causes of pollution alone. Where products or materials are persistent or contain substances of concern, proper management at end of life, including recycling, does not eliminate the risks associated with use, fragmentation or environmental leakage. Upstream measures, including redesign and material substitution, should therefore be emphasised in the Cluster discussions to complement strategies like reduction, safe reuse and recycling.

Renewable sourced, novel materials that can replace plastics possess properties like biocompatibility and biodegradability, and although rapid biodegradability is not a waste management strategy or a solution to litter, from a non-toxicity and non-persistence lens, such materials can play a key role in applications posing a high risk of persistence when . Provided that the relevant performance is demonstrated under appropriate conditions and does not introduce other risks. It should not be treated as a waste management strategy or as support for littering. Its relevance should be considered through safety, non-persistence and environmental performance over the relevant life cycle.

Cluster C

- Capacity-building, technical assistance, technology transfer, including international cooperation
- Financial resources and mechanism

Capacity-building, technical assistance and technology transfer, including international cooperation

Capacity-building and technology transfer should support countries not only in improving waste management, but also in developing the capacity to assess, develop and adopt safer materials and products. This includes research and development, testing and verification, standards and assessment methodologies, as well as the technical capacity needed to develop local feedstock-to-material and product value chains where appropriate.

The absence of globally harmonised standards and assessment methods remains a practical barrier to the responsible development and adoption of new materials. International cooperation should therefore facilitate access to knowledge, testing methodologies, technical expertise and technologies, alongside infrastructure and skills. This is also important to avoid regrettable substitution and ensure that transitions away from fossil-based plastics are based on demonstrated safety and environmental performance rather than material labels alone.

Cluster D

- Preamble
- Objective
- Principles and approaches
- Definitions
- Just transition
- Public information, awareness, education and research
- Secretariat
- Final provisions

Principles and approaches

GO!PHA recommends that the instrument reflect the principle of evidence-based, criteria-driven assessment across materials and products, including consideration of chemicals of concern extensively documented in research done across regions to cause significant harm. Assessments should take account of material origin, persistence risks and safety, and environmental performance beyond the product's end-of-life. The criteria should be sufficiently flexible to incorporate developments in science and technology.

This would allow differences between materials to be addressed through evidence and performance rather than through definitional carve-outs or blanket classifications. It would also provide a basis for verifying claims and establishing when differentiated measures are justified.

Definitions

Definitions should provide the clarity necessary for implementation without unnecessarily constraining the instrument as material science and technologies develop. Where concepts such as biodegradability, compostability, biobased materials or substitutes are used, their application should be supported by clear technical parameters, testing and verification rather than broad

qualitative descriptors. This is also important to avoid both greenwashing and unintended barriers to materials suitable to replace petro-plastics whose properties differ from conventional plastics but which may be relevant to particular applications.

Closing Statement

GO!PHA commends the INC and Chair's efforts to enable convergence and guide the discussions methodologically in the lead up to INC-5.4. We see an opportunity across the Clusters to enhance a coherent link between upstream prevention, product design, material innovation and downstream management. The objective should be to address plastic pollution at source while ensuring that measures remain grounded in safety, environmental performance and the realities of implementation. Three elements are particularly important: applying harmonised, evidence-based criteria to determine the risks and performance of products and materials; enabling product redesign and verified substitution where these can reduce identified risks, alongside reduction, reuse, recycling and effective waste management; and providing the scientific, technical, financial and capacity-building support needed to make these approaches implementable across different national circumstances. Such an approach would provide Parties with greater clarity on how to assess and act on products and materials, while allowing the instrument to evolve with scientific and technological developments.