

GSCF submission in response to the INC Chair's guiding questions

Ahead of the informal Heads of Delegation meeting on the plastics treaty · Bangkok, 27–30 September 2026

The Global Self-Care Federation (GSCF) thanks the Chair for the opportunity to contribute to these consultations. GSCF supports an effective instrument to end plastic pollution while protecting human health and access to safe, quality healthcare products. Our contribution draws on activities under GSCF's Charter for Environmentally Sustainable Self-Care, including published research on pathways towards more sustainable blister packaging.

B1 Enable sustainable packaging while safeguarding essential healthcare uses

GSCF supports measures that encourage packaging innovation and the transition to more sustainable alternatives. For non-prescription medicinal products, this transition must preserve the protective functions of packaging and meet applicable safety, quality and regulatory requirements. These considerations should be explicit in both product measures under Article 4 and product-design measures under Article 5.

Article 4(2) identifies product necessity, the feasibility and availability of alternatives, scientific evidence and socio-economic impacts as considerations for national measures. GSCF recommends expressly applying these considerations to proposals and decisions under Article 4(3)–(4). This would ensure that healthcare needs and the consequences of substitution are assessed consistently when considering measures at either national or global level. Further, the difficulty of recycling or limited suitability for reuse should not, on its own, justify restricting non-prescription medicinal product packaging, where product protection, hygiene requirements and potential medicine residues may constrain these options. Any measures must consider the potential consequences for patient safety and continued access to products.

The instrument should provide targeted exemptions for specific consumer healthcare uses where safe and technically feasible alternatives are unavailable at the necessary quality and scale. Where suitable alternatives can be introduced, extended compliance periods should reflect the time needed for development, validation, stability testing and, where applicable, regulatory approval. The availability of an alternative material does not, by itself, establish its suitability for a particular product.^[1, 3]

Non-prescription medicinal product packaging protects product quality, safety and efficacy. Prohibiting necessary uses before suitable alternatives are available and validated could disrupt supplies and access to medicines. An explicit safeguard would ensure that measures to address plastic pollution do not compromise public health, while enabling substitution when safe, viable alternatives become available.

B3 Connect better product design with effective collection sorting and recycling

Through its Charter for Environmentally Sustainable Self-Care, GSCF is supporting the transition towards more sustainable non-prescription medicinal product packaging. Our published blister-packaging research demonstrates why packaging innovation must be accompanied by improvements in waste-management systems^[2]

Trials commissioned by GSCF at three European sorting facilities found that small, lightweight blister packs were lost from the recovery stream before reaching material sorting. The policy implication is that changing packaging materials alone may not overcome barriers associated with pack size, weight and sorting processes.^[2] Research published in Nature in 2026 also shows that collection and sorting choices affect the quantity and quality of plastic recovered for recycling.^[4] Product-design measures under Article 5 and waste-management measures under Article 7 should therefore be developed together, so that improvements in packaging translate into recovery in practice.

GSCF recommends that the work programmes and guidance envisaged under Article 7(5) address these practical barriers through cooperation across the packaging value chain. Manufacturers should advance packaging improvements compatible with product safety; public authorities should enable appropriate collection systems and investment; and sorting and recycling operators should develop and validate processes capable of handling these formats. This work should involve medicines regulators and draw on existing research and initiatives to identify effective solutions and avoid duplication.

Measures to improve collection, sorting and recycling should be well designed and proportionate, taking account of the regulatory requirements governing consumer healthcare packaging and the infrastructure available.^[3]

Distinguishing design limitations from infrastructure gaps would help direct both incentives and investment towards the causes of poor recovery. Producers should have clear incentives to improve packaging, while governments and waste operators should have clear responsibilities for enabling those improvements to deliver environmental benefits.

Further, product-design measures must not override the safety, quality and regulatory requirements governing consumer healthcare packaging. For example, recycled-content requirements can conflict with these safeguards, as recycled plastics may retain impurities from previous uses that could contaminate the product. Where materials meeting the required standards are unavailable, mandatory content levels could also jeopardise supply of consumer health products.

GSCF looks forward to continued constructive dialogue with Member States and stakeholders to advance sustainable packaging, effective waste management and the protection of patient safety and access to medicines.

References

Article references refer to the Chair's 8 August 2026 Aid to Negotiations.

[1] GSCF / IFPMA / IGBA. Joint plastics treaty statement (14 November 2024).

[2] GSCF. Challenge to Change: Advancing Sustainable Blister Packaging (July 2025).

[3] GSCF. Transition to sustainable plastic packaging for consumer healthcare products (2024), pp. 6–13.

[4] Schmuck A et al. Analysis of trade-offs of post-sorting plastic packaging. Nature 654, 383–390 (2026).

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