

Observer Written Views

Response to the Guiding Questions for the Second Informal In-Person Meeting of Heads of Delegation to the Intergovernmental Negotiating Committee on Plastic Pollution

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The International Bottled Water Association (IBWA) appreciates the opportunity, as an observer to the Intergovernmental Negotiating Committee (INC) on Plastic Pollution, to contribute to the ongoing negotiations and to provide comments in response to the Secretariat's guiding questions. IBWA values the opportunity to engage constructively in this process and looks forward to serving as a meaningful partner in the development and implementation of an effective international instrument.

About the International Bottled Water Association

Founded in 1958, the International Bottled Water Association (IBWA) is the leading trade association representing the bottled water industry. IBWA's membership includes bottlers, distributors, and suppliers across the United States and around the world that provide safe and reliable hydration to consumers, while operating across the full lifecycle of packaging – from product and packaging design through collection, recycling, reuse, and end-of-life management. This includes both single-use, recyclable bottles as well as refillable large-size containers. Access to safe drinking water is essential to human health and well-being, and adequate hydration is fundamental to life. Packaged water can play an important role in providing safe and reliable hydration, particularly where potable water infrastructure is limited or temporarily disrupted.

As negotiations continue, IBWA is committed to sharing technical expertise, industry experience, and practical approaches that can help advance measurable reductions in plastic pollution and strengthen circularity. In considering the future international instrument, IBWA believes meaningful progress will depend on cooperation across the plastics value chain and on approaches that translate international commitments into measurable environmental outcomes while allowing Parties sufficient flexibility to address plastic pollution in ways appropriate to their national circumstances.

IBWA offers the following comments in response to the Secretariat's guiding questions.

Cluster A: National Plans, Reporting, Implementation and Compliance, Information Exchange, and Effectiveness Evaluation

Question 1. What purposes are National Plans expected to serve as a contribution to the achievement of the objectives of the instrument?

IBWA Comments: National Plans should provide a practical framework for translating the objectives of the instrument into measurable national action. National Plans should:

- Identify implementation gaps, infrastructure needs, and capacity constraints relevant to the collection, sorting, recycling, and environmentally sound management of plastic waste.
- Establish achievable timelines and measurable indicators of progress that allow Parties to track implementation and assess progress toward agreed objectives.
- Reflect national circumstances and capabilities. Parties differ in geography, economic conditions, existing waste-management infrastructure, recycling capabilities, and other relevant conditions. National Plans should therefore allow flexibility in determining how common objectives are achieved rather than prescribing a single approach.

Question 2. How could provisions on reporting, implementation and compliance, information exchange, and effectiveness evaluation support the overall implementation of the instrument, and what is the relationship between these articles?

IBWA Comments: Reporting, implementation, compliance, and effectiveness evaluation should function as complementary elements of a practical and transparent implementation framework. These provisions should:

- Use clear terminology, appropriate methodologies, and consistent approaches to data collection where appropriate to improve transparency and support meaningful evaluation of progress.
- Use reporting and evaluation to identify implementation gaps and areas where additional capacity or resources may be needed.
- Evaluate progress using reliable data collected over time. Where appropriate, information collected before and after implementation can help assess environmental outcomes and inform future adjustments.
- Maintain an appropriate balance between transparency and administrative burden, ensuring that reporting and compliance requirements remain practical and proportionate to the objectives of the instrument.

Question 3. What will be the role of information exchange in the overall implementation of the instrument and how can it contribute to its effectiveness?

IBWA Comments: Information exchange can support effective implementation by helping Parties share best practices and practical experience. Information exchange should:

- Facilitate the sharing of information related to collection systems, recycling, waste management, design for recycling, and other approaches that support circularity.
- Promote transparency and collaboration across the value chain, including among governments, producers, recyclers, waste-management operators, consumers, and other relevant stakeholders.
- Avoid duplicative or unnecessary reporting requirements. Information exchange should complement, rather than unnecessarily expand, formal reporting obligations under the instrument.

Cluster B: Releases and Leakages, Existing and Legacy Plastic Pollution, Plastic Waste Management, Plastic Product Design, and Plastic Products

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

IBWA Comments: Decisions regarding potential global measures, actions, or cooperation should be guided by transparent, science-based, and risk-informed criteria. Relevant considerations include:

- Recyclability and existing recovery pathways, including the availability and effectiveness of collection, sorting, and recycling systems.
- Product function and necessity, including the role a product serves in safely delivering food, beverages, or other essential goods.
- Full life-cycle environmental impacts, including resource use, energy consumption, greenhouse gas emissions, waste generation, and end-of-life management.
- Technical and economic feasibility, including the ability of existing systems and technologies to support proposed measures.
- Existing infrastructure and national and regional circumstances, recognizing significant differences in collection, sorting, recycling, economic conditions, geography, and access to safe and reliable drinking water.

For materials such as PET, which have established collection and recycling pathways in many markets and can incorporate post-consumer recycled content, policy approaches should prioritize expanding collection, recycling capacity, recycled-content markets, and design for recycling rather than applying broad restrictions based solely on the presence of plastic.

IBWA strongly opposes broad bans, restrictions, or taxes on PET beverage containers and other PET applications that have established collection, sorting, recycling, reuse, or other environmentally sound end-of-life pathways. Such measures risk discouraging the use of recyclable materials, undermining investment in collection and recycling systems, and inadvertently driving shifts away from approaches that can directly reduce plastic pollution and to less sustainable alternative packaging with higher carbon and energy footprints.

Question 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?

IBWA Comments: Addressing existing and legacy plastic pollution will require both preventing additional leakage and developing practical approaches to identify, assess, and address existing accumulations. Enabling factors should support investment in waste-management systems, reliable data, risk-based decision-making, and cooperation among governments, industry, communities, and other relevant stakeholders.

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

IBWA Comments: Effective waste management requires cooperation across the entire value chain and approaches that can be adapted to different national circumstances and capabilities

Parties should:

- Promote cooperation, including among governments, producers, suppliers, recyclers, waste-management operators, consumers, and other relevant stakeholders.
- Consider a range of policy approaches to improve collection and recycling, including well-designed extended producer responsibility (EPR) programs and deposit return systems where appropriate. Such systems should establish clear roles and responsibilities, transparent reporting and monitoring, appropriate enforcement, and incentives that recognize recyclability and other relevant design characteristics.

Cluster C: Capacity-Building, Technical Assistance, Technology Transfer, International Cooperation, Financial Resources and the Financial Mechanism

Question 1. What elements must be considered to ensure that all available financial sources, including public finance, are effectively mobilized for the implementation of the instrument?

IBWA Comments: Effective implementation will require mobilizing a range of public and private financial resources to strengthen collection, waste management, recycling, and circularity.

Public finance and private investment should be complementary.

- Public resources can help establish foundational systems and build capacity, while private investment can support collection and sorting systems, recycling technologies, manufacturing capacity, and markets for recovered and recycled materials.
- Financial mechanisms should support stable and economically viable markets for recovered and recycled materials, recognizing that reliable end markets are important to sustaining investment in recycling infrastructure and advancing circularity.

Question 2. What role should the private sector have in facilitating the mobilization of financial resources, capacity building and technical assistance, and what elements could be considered under the financial mechanism to promote such a role?

IBWA Comments: The private sector is an important partner in implementing the instrument and brings technical expertise, infrastructure, market knowledge, and investment capacity across the beverage, packaging, recycling, and broader plastics value chains.

- Public-private partnerships and other forms of co-investment can leverage private capital and technical expertise to accelerate infrastructure development, technology deployment, and innovation.

Question 3. What provisions related to technology transfer could foster international cooperation, considering the capacity differences between countries?

IBWA Comments: Technology transfer and technical cooperation can help countries develop the capacity needed to collect, sort, recycle, and manage plastic waste in an environmentally sound manner. International cooperation should facilitate access to relevant technologies, technical expertise, training, and best practices while recognizing differences in infrastructure, economic conditions, technical capacity, and existing waste-management systems.

Cluster D: Preamble, Objective, Principles and Approaches, Definitions, Just Transition, Public Information, Awareness, Education and Research, Secretariat, and Final Provisions

Question 1. Which principles and approaches could be useful in guiding the effective implementation of the instrument, and how could these be best reflected in the instrument?

IBWA Comments: The instrument should be grounded in science, proportionality, transparency, flexibility, and consideration of environmental impacts across the full life cycle of products and materials. Implementation should recognize national circumstances and promote practical, evidence-based approaches that reduce plastic pollution while advancing circularity and maintaining access to products that provide important societal benefits.

Question 2. How can actions related to public information, awareness, education, and research support implementation?

IBWA Comments: Public information, awareness, education, and research are important components of effective circularity and can help governments, industry, consumers, and other stakeholders make informed decisions. Clear and accurate information about recyclability, disposal and sorting practices, and available collection systems can support more effective participation in recycling and waste-management systems. These efforts are most effective when paired with appropriate infrastructure.

- Public awareness initiatives should complement, rather than substitute for, investments in collection, sorting, recycling, and waste-management infrastructure. Education alone cannot achieve circularity where appropriate systems for collection and recycling are unavailable.
- Information provided to consumers should reflect the recycling systems and capabilities available in the relevant jurisdiction, helping ensure that guidance is practical and actionable.

Question 3. Considering the progress achieved so far in the discussions related to issues such as the Secretariat and definitions, does the current formulation in the Aid to Negotiations reflect the level of detail required?

IBWA Comments: The final instrument should provide sufficient clarity and legal predictability to support consistent implementation while avoiding unnecessary prescriptive detail that could limit innovation or fail to account for differences in national circumstances. Definitions and other core provisions should be clear, technically sound, and sufficiently flexible to remain relevant as science, technology, and recycling systems evolve.

General Comments and Conclusion

IBWA recognizes the importance of the INC's work to address plastic pollution and appreciates the opportunity to contribute its industry experience and technical perspective to these discussions. An effective international framework can advance practical solutions that reduce plastic pollution while strengthening collection, recycling, waste-management systems, and markets for recovered and recycled materials.

The framework should also recognize the important role that safe and reliable packaged water can play in supporting public health, community resilience, and emergency response, particularly where access to potable water infrastructure is limited or temporarily disrupted.

PET (polyethylene terephthalate, resin identification code #1) is widely used for food and beverage packaging because it is safe, lightweight, resealable, shatter-resistant, and recyclable. PET packaging can be made with up to 100 percent post-consumer recycled material and has established collection and recycling pathways in many markets.

PET's lightweight properties can also provide significant resource and transportation efficiencies compared with alternative beverage packaging materials. Life-cycle assessments have found that PET can have lower greenhouse gas emissions and energy use than alternatives such as glass and aluminum in beverage applications. These characteristics demonstrate why plastic packaging should be evaluated based on its environmental performance, recyclability, function, and full life-cycle impacts rather than material type alone.

IBWA encourages a flexible, science-based framework that recognizes national circumstances, mobilizes public and private resources, facilitates technology transfer and international cooperation, and advances practical pathways toward a more circular plastics economy.