

9/12/2026

Your Excellencies:

International Fresh Produce Association (IFPA) welcomes an opportunity to provide responses to the Guiding Questions.

IFPA is a non-profit organization with a 501(c)(6) tax status in the United States, and with over 3,000 member companies world-wide. IFPA represents the entire fresh produce supply chain, from seed companies to retailers and quick serve restaurants. The majority of IFPA members are grower/shippers of fresh fruits, vegetables and florals, and we speak for member companies of all sizes – from family-owned companies to those in the S&P500, from small farmers and ranchers to multinational chains. IFPA exists to grow a healthier world, and we see issues surrounding plastics as a key conversation toward achieving this goal of bringing fresh fruits, vegetables and flower to every table – and doing so economically, sustainably and safely.

IFPA is a UNEP Observer.

Responses to Guiding Questions for the Second Informal In-Person Meeting of Heads of Delegation

We support the objective of reducing plastic pollution and advancing circularity. In doing so, the instrument should recognize that packaging used in food systems performs functions that extend well beyond containment. For fresh and highly perishable foods, packaging can be integral to food safety, product integrity, shelf-life extension, prevention of food loss and waste, traceability, consumer information, and efficient domestic and international distribution.

A workable instrument should therefore distinguish among plastic applications according to their **function, environmental performance, availability of viable alternatives, and consequences of substitution or removal**. Measures should seek net environmental improvement across the food-and-packaging system rather than reductions in plastic use considered in isolation.

Cluster B

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

Global measures should be guided by a science-based, **risk- and function-based assessment** rather than by material type or packaging weight alone.

Plastic products perform different functions and present different environmental, health, economic, and societal trade-offs. Before a product is made subject to restrictions, reduction targets, fees, substitution requirements, or other global measures, Parties should consider at least the following factors:

- the necessity and intended function of the product;
- the likelihood and magnitude of environmental releases and pollution;
- the availability, technical feasibility, safety, environmental performance, and affordability of alternatives;
- the consequences of removing or substituting the product;
- full life-cycle environmental impacts;
- opportunities for reuse, recycling, composting, and use of recycled or biobased content;
- impacts on food safety, food security, food loss and waste, shelf life, traceability, and supply-chain performance; and

- socioeconomic effects, including affordability, market access, international trade, and the viability of agricultural production systems.

For food packaging in particular, **functional necessity should be an explicit part of the assessment**. Packaging can prevent moisture loss, physical damage, contamination and spoilage; maintain appropriate atmospheres and cold-chain performance; enable traceability and required labeling; and extend the marketable life of highly perishable foods. Accordingly, the existence of an alternative material should not by itself establish that the alternative is functionally viable. Alternatives should be evaluated against comparable performance criteria, including food-contact safety, barrier performance, shelf life, physical protection, compatibility with packing and distribution systems, and the environmental consequences of additional food loss or waste.

This approach can provide a practical bridging mechanism. Rather than categorically including or excluding broad classes of plastics, the instrument could establish a functional-necessity and performance assessment under which Parties evaluate whether a product:

1. performs an essential or materially beneficial function;
2. has a technically and economically viable alternative capable of providing equivalent performance;
3. creates a demonstrable net environmental benefit when removed or substituted; and
4. can instead be improved through design, reuse, recycling, composting, recycled content, or other circularity measures.

Where credible evidence shows that packaging reduces food loss or waste, protects food safety, enables regulatory compliance, or otherwise provides significant food-system benefits, the instrument should allow an exclusion, exemption, differentiated treatment, or alternative compliance pathway rather than automatically applying a restriction or fee.

The same principle should inform plastic-product design requirements. Packaging should be designed progressively toward reuse, recycling, composting and lower environmental impact, but those objectives should be pursued without compromising the essential performance of the packaging.

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

International cooperation should focus on establishing common objectives and interoperable standards while preserving flexibility in how countries achieve them.

Waste-management infrastructure, collection systems, recycling capacity, composting capacity, market conditions, geography and financial resources vary substantially among jurisdictions. The instrument should therefore avoid assuming that a single waste-management model or material pathway will perform equally well in all countries.

Cooperation could usefully focus on:

- internationally compatible definitions and terminology for recyclable, reusable and compostable packaging;
- common approaches to packaging identification and labeling;
- development and dissemination of technical standards;
- capacity building for collection, sorting, recycling, composting and safe disposal;
- development of stable end markets for recovered materials;
- sharing of information and successful technologies;
- technical and financial support for countries in which recovery infrastructure remains underdeveloped; and

- realistic transition periods that recognize differences in infrastructure and industrial capacity.

We have specifically advocated internationally aligned terminology and identification systems so that consumers and recovery systems can distinguish among recyclable, reusable, compostable and other pathways, while reducing contamination and unnecessary fragmentation in requirements affecting internationally traded foods.

A particularly important distinction should be maintained between the characteristics of a material and the current availability of infrastructure capable of recovering it. Technically recyclable or compostable packaging should not automatically be treated as environmentally undesirable solely because collection or processing infrastructure has not yet developed in a particular jurisdiction. Instead, policy should create incentives to build the infrastructure needed to recover viable materials at scale.

For fresh foods, implementation timelines should also reflect the operational requirements associated with packaging conversion. Packaging systems are integrated with packing equipment, cold chains, transportation and food-safety processes, and redesign may require testing and validation before implementation. We call for realistic transition periods and recognition of equipment compatibility when packaging changes are required.

Cluster C

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?

Financial mechanisms should be designed around defined environmental outcomes and identified implementation needs. Those needs are likely to differ significantly among countries and should include collection, sorting, recycling and composting infrastructure; remediation of existing pollution; research and innovation; technical assistance; information systems; and development of markets for recovered materials.

Public finance can play a particularly important role where necessary infrastructure has public-good characteristics, where the economics of collection and recovery are not yet self-sustaining, or where countries lack sufficient capacity to make the initial investments required for implementation.

Private financing and producer responsibility mechanisms can complement those investments. However, financing mechanisms should be structured so that revenues collected for plastic-pollution objectives are demonstrably directed toward those objectives rather than operating principally as general charges on material use.

For producer responsibility systems, revenues should therefore support activities such as collection, sorting, recycling, composting, infrastructure expansion, innovation and stable end markets for recovered materials.

Financial mechanisms should also avoid incentives that inadvertently worsen environmental outcomes elsewhere in the food system. For example, increasing the cost of packaging that materially prevents spoilage or food loss may reduce packaging use while increasing the environmental impacts associated with discarded food. We therefore recommend evaluating packaging policy on the basis of net environmental outcomes, including avoided food loss and associated impacts.

Transparent governance, predictable requirements and meaningful stakeholder participation will also be important to mobilizing private investment. Long-term investment in packaging innovation and recovery infrastructure requires sufficient regulatory predictability for businesses to evaluate and finance new technologies.

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?

The private sector can provide substantially more than financial contributions. Companies and supply-chain organizations possess technical expertise, operational infrastructure, material-performance data, distribution networks, research capabilities and practical knowledge that can accelerate implementation.

Private-sector, supported by public investment, could include:

- co-investment in collection, sorting, recycling and composting infrastructure;

- research, demonstration projects and pilots for new materials and packaging systems;
- development of reusable and closed-loop systems;
- provision of technical expertise on packaging design and performance;
- data on material flows, recovery and product performance;
- capacity building and workforce development;
- development of end markets for recycled materials;
- validation of recycled, compostable, reusable and alternative packaging technologies; and
- public-private partnerships designed to address specific infrastructure or technical gaps.

Financial mechanisms should encourage such participation through transparent and predictable rules, opportunities for co-financing, competitive research and demonstration funding, and recognition of investments already made in circular systems.

Particular value can come from pilot projects and evidence generation. For fresh foods, changes in packaging frequently require validation under actual operating conditions because performance depends on commodity physiology, temperature, humidity, distribution time, mechanical stresses, food-safety requirements and other factors. Public-private demonstration programs can help distinguish technologies that deliver genuine environmental improvements from those that merely shift impacts from packaging to food loss, energy consumption or other parts of the supply chain. The private sector should therefore be treated as an implementation and innovation partner, while governments retain appropriate responsibility for establishing public policy, environmental objectives, oversight and accountability.

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

Technology cooperation should help countries obtain and adapt technologies that are appropriate to their infrastructure, environmental conditions, food systems and economic circumstances rather than assuming that technologies developed for one market can simply be transferred unchanged to another.

Priority areas could include:

- evaluating direct and indirect impacts on trade resulting from restrictions on primary, secondary and transportation packaging for fresh foods. Indirect impacts may include cross-border travel of quarantine pests, diseases and foodborne human pathogens
- assessing trade-offs of packaging substitutions vs food loss and waste
- development of technologies for maintaining food safety and shelf life, and reducing food loss/waste of the products that undergo packaging elimination, substitution or replacement
- waste collection and sorting technologies;
- recycling and composting technologies;
- reusable packaging and logistics systems;
- packaging designs using recycled or lower-impact materials;
- technologies that reduce material use while maintaining performance;

- methods for identifying and separating materials in recovery systems;

For fresh-food systems, technology transfer should specifically recognize the connection between packaging, cold-chain performance and food-loss prevention. Packaging solutions that perform well in markets with highly developed cold-chain and recovery infrastructure may not provide the same outcome where those systems are limited.

Technology cooperation should therefore encompass not only transfer of equipment or intellectual property but also training, technical assistance, demonstration, local adaptation, validation and development of the surrounding infrastructure necessary for successful deployment.

The instrument should remain technology- and chemistry-agnostic, allowing countries and businesses to adopt reusable, recyclable, recycled-content, compostable, biobased and other emerging approaches where they can safely and effectively perform the required function.

Cluster D

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?

A limited set of cross-cutting principles could provide important consistency across the instrument while allowing Parties flexibility in implementation.

Science- and evidence-based decision-making. Measures should be informed by the best available scientific evidence and should consider the consequences of both action and substitution.

Life-cycle thinking and net environmental outcomes. Environmental performance should be evaluated across the complete system rather than by focusing on plastic quantity alone. In food systems, this requires consideration of the food protected by the packaging as well as the packaging itself.

Functional performance. Measures affecting products should recognize the function a product performs and whether alternatives can achieve comparable safety and performance.

Technology and material neutrality. The instrument should establish desired environmental outcomes rather than prematurely selecting particular technologies or materials. Reuse, recycling, composting, recycled content, biobased materials and other approaches may all contribute depending on the application and local circumstances.

Protection of human health and food safety. Measures intended to reduce plastic pollution should not create incentives to substitute packaging in ways that increase contamination or undermine established food-safety requirements.

Food security and prevention of food loss and waste. For food applications, the environmental consequences of food loss and waste should be included in policy decisions. Packaging that extends shelf life, reduces damage or enables safe movement of perishable products can contribute directly to food availability and efficient use of resources.

Circularity. Product and packaging policy should encourage reuse, recycling, composting and incorporation of recycled content where appropriate, while supporting the infrastructure and markets required for those systems to function.

Proportionality and differentiation. Measures should correspond to the environmental problem being addressed and recognize meaningful differences among applications rather than presuming that all plastic products pose equivalent risks or provide equivalent societal benefits.

National circumstances and implementation capacity. Common global objectives should be accompanied by sufficient flexibility for countries to select implementation pathways appropriate to their infrastructure, markets and capabilities.

Regulatory coherence and predictability. Harmonized terminology, interoperable standards, transparent requirements and realistic transition periods can improve environmental implementation while reducing unnecessary fragmentation and barriers to trade.

These principles should not exist only in the preamble. Where relevant, they should be reflected in the operative provisions governing product measures, product design, EPR, waste management, financial mechanisms and implementation guidance so that they meaningfully inform future decisions under the instrument.

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

Information, education and research should be designed to enable correct action by consumers, governments and businesses, rather than simply increase general awareness of plastic pollution.

Consumer information should make disposal and recovery pathways as clear and unambiguous as possible.

Internationally aligned identification and labeling approaches could help consumers distinguish among reusable, recyclable and compostable packaging and reduce contamination of recovery streams. This is particularly important for internationally traded foods, where multiple inconsistent national labeling systems can require redesign while providing little additional environmental benefit.

Education should also address the relationship between packaging and the product it protects. In food systems, consumer behavior concerning packaging removal, storage, shelf life and disposal can influence both packaging waste and food waste.

Research priorities should include:

- comparative life-cycle assessment of packaging alternatives;
- methodologies that incorporate avoided food loss and waste;
- performance of recyclable, reusable and compostable packaging in different applications;
- food-contact safety and performance of recycled and emerging materials;
- improved collection, sorting and recycling technologies;
- compatibility of compostable materials with organic-waste systems;
- impacts of packaging on shelf life, physical damage and spoilage;
- approaches to standardize packaging identification;
- measurement of plastic leakage and recovery; and
- practical evaluation of packaging alternatives under real supply-chain conditions.

Research programs should encourage collaboration among governments, academia, material developers, packaging manufacturers, food producers, retailers, recyclers and other supply-chain participants. Pilot projects and field validation should be emphasized where laboratory performance may not reliably predict environmental or operational outcomes.

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?

For definitions, the instrument should contain sufficient detail to provide clarity, interoperability and predictable implementation, while avoiding definitions so prescriptive that they prevent adaptation as technologies and recovery systems evolve.

Definitions with particular practical importance include terms relating to recyclability, reuse, compostability, recycled content and relevant product or packaging categories. Where internationally recognized standards already exist, implementation should seek alignment with those standards rather than creating unnecessarily divergent national interpretations.

For globally traded food products, consistent terminology has particular value. Differences in definitions can result in the same packaging being treated differently among markets, create conflicting labeling requirements and discourage investment in packaging designed for circularity.

At the same time, definitions should distinguish appropriately between:

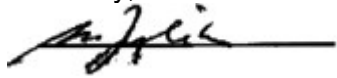
- inherent characteristics of a material or product;
- the function for which it is used; and

- the availability of infrastructure capable of collecting or processing it.

For example, whether a technically recyclable material is actually collected in a particular municipality is an infrastructure question and should not necessarily redefine the inherent recyclability of the material itself. Infrastructure-dependent definitions can result in identical packaging being considered recyclable in one jurisdiction and non-recyclable in another. Further technical detail can appropriately be developed through Conference of the Parties decisions, guidance or internationally recognized standards where regular updating will be necessary. The treaty text itself should establish the essential concepts and guardrails necessary to ensure predictable implementation, while leaving highly technical criteria capable of evolving with science, technology and infrastructure.

We thank you for considering our input, and the impact it would have not only on our members, but also on consumers world-wide.

Sincerely,

A handwritten signature in black ink, appearing to read 'Max Teplitski', with a long horizontal line extending to the right.

Max Teplitski
Chief Science Officer, International Fresh Produce Association

