



Submission to the INC Process

September 2026

The International Federation of Pharmaceutical Manufacturers and Associations (IFPMA) thanks the INC chair for this opportunity to submit views on the guiding questions circulated in advance of the second informal in-person heads of delegation meeting. IFPMA represents the innovative pharmaceutical industry at the international level.

IFPMA supports a harmonized, global approach that prioritizes patient safety and safeguards access to medicinal and medical products. We support a transition to a circular economy for plastics in healthcare, where products and packaging are designed, when possible, for reuse, recycling, and minimal environmental impact, while safeguarding patient safety.

While addressing the health and environmental impacts of plastic pollution throughout the plastics lifecycle is essential, plastics continue to play a critical role in delivering safe, effective and accessible healthcare. Thus, we focus our comments on Cluster B and the guiding question, “What considerations should guide decisions on determining which plastic products will require possible global measures, actions or cooperation?”

IFPMA asks governments to consider the following:

- Plastic materials and components perform essential functions throughout the pharmaceutical value chain, including in research and development, manufacturing and contamination control, primary and secondary packaging, drug-delivery systems, transport and distribution.
- In many healthcare applications, safe and reliable alternatives are not currently available at sufficient quality and scale. One such example is primary packaging or other applications in direct contact with medicines where material selection is critical to product stability, quality and patient safety.
- Plastic products must be considered in the context of specific sectors, e.g. the medical sector. Specifically, single-use applications required for sterility, contamination control, product integrity, accurate delivery or patient safety should not be considered problematic solely because they are single-use.

- Special provisions may be needed for medical and medicinal products to enable a reduction in plastic pollution while ensuring patient safety, such as: (i) targeted extended compliance periods, aligned with regulatory approval timelines and supply-chain adaptation needs; and (ii) limited exemptions where no safe and technically feasible alternatives are available at sufficient quality and scale. These measures are essential to avoid disruption to medicine supply and patient access.
- The overall environmental and health trade-offs between plastic use versus other options are complex and application-dependent. Any decisions on substitution should be science-based, risk-proportionate and informed by lifecycle impacts. They should consider the product's function and use context, worker safety, regulatory frameworks, supply continuity, and the comparative environmental and health impacts of available alternatives—and keep patient safety and availability of medicines and healthcare products at the core of any regulatory requirements.
- Measures promoting recycling or recycled content must not compromise material purity, traceability, functional performance, product quality, sterility or patient safety. Requirements should reflect the constraints applicable to primary packaging and other regulated healthcare applications.
- We support globally coherent requirements, and global harmonization should be pursued in a manner consistent with existing legislation where feasible. Health and environmental authorities should coordinate closely with relevant sector stakeholders to avoid duplicative or conflicting requirements, promote effective and transparent implementation of the Instrument, and prevent disruptions to global supply chains.

An evidence-informed, science-based and proportionate approach is essential to protect human health and the environment while maintaining product quality, patient safety, supply continuity and access to medicines. IFPMA remains committed to advancing safe, effective and sustainable solutions. Further information is available in our [position paper](#).

Thank you.
