

**Written inputs from the International Council of Chemical Associations (ICCA) ahead of the
Second informal in-person meeting of Heads of Delegation to the Intergovernmental
Negotiating Committee on Plastic Pollution in Bangkok**

Cluster A

National Action Plans should be mandatory but flexible, empowering countries to choose solutions that work locally. Countries face different challenges and require different solutions – national action plans based on global guidance in key areas that drive circularity must be at the core of the agreement, with common elements and reporting requirements that hold countries accountable for tracking progress. Its effective implementation requires investment in innovation, infrastructure, policy and regulatory systems, capacity building efforts, adequate financing, technical assistance and education programs particularly for developing countries.

Cluster B

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

Plastic products are not within the scope of the agreement and therefore the agreement should not include global measures directed at plastic products.

Countries face different challenges and require different solutions. That is why national action plans, tailored to each country's unique circumstances and capabilities, should form the foundation of the agreement. In this regard, we recognize that there is a role for action at the national level.

Recognizing the inherent complexity and diversity of final goods and components fully or partially made of plastics used in different industries for various purposes, we call for a nationally-driven plastic application-based approach that helps identify which applications could be considered problematic and avoidable, while considering the socio-economic and environmental value of applications such as (but not limited to) medical applications, food waste prevention and those enabling energy transition, according to national needs.

ICCA supports the establishment of a common assessment framework in a global agreement in the form of a decision tree to help governments evaluate plastic applications with a high risk of leakage to the environment at the national level. The assessment tool would establish a globally standardized approach to evaluating plastic applications at the national level, allowing governments the flexibility to assess plastic applications in their respective markets and implement measures through the National Action Plans (NAPs).

The decision tree would also recognize the innovation potential of plastics, providing a transitional period for implementing circularity frameworks, and offering businesses greater certainty. This approach fosters a positive investment climate, encouraging the large-scale investments necessary to address the challenges of plastic waste. The assessment tool would

also enable national decision making within a global framework tool and help national governments avoid regrettable substitutions.

The agreement should stay focused on ending plastic pollution, not chemicals already regulated elsewhere. There are existing mechanisms in place to comprehensively manage chemicals across relevant uses, including in plastics, through national, regional and global frameworks, and as promoted by Global Framework on Chemicals (GFC), which is already driving governments to establish such legally binding chemicals management schemes at the national level.

Moreover, chemical additives are assessed for functional performance and product safety based on risk and exposure as part of the product design stage. To help increase transparency on the use of chemical additives in plastics, [ICCA has developed a Plastic Additives Database](#) that builds upon the UN Environment Programme's Chemicals in Plastics Technical Report. It aims to empower regulators to explore what additives are actually being used within their respective countries, as well as provide risk-based tools to assess them. We believe that a purely hazard-based approach undermines the stated purpose of many who desire to use an 'evidence-based' path forward.

While the intrinsic hazards of a chemical are the same regardless of geography, the uses and exposure scenarios are country specific. Countries should be able to determine how they mitigate potential risks for the priority chemicals and critical uses that make the most sense for their constituents.

ICCA's Plastic Additives Database leverages the extensive information and resources from those systems, bolsters that material with data from additive manufacturers, and publicly shares the contents in a user-friendly format. The database includes:

- The identification use and function of additives that are currently in commerce or that have been in commerce for the past 10 years.
- Available hazard classifications of an additive.
- Reference/citation to existing chemical management laws regulating specific additives.

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

To further accelerate a global transition to plastics' circularity, we need a policy and enabling ecosystem that allows access to waste management solutions and encourages continued investment in recycling innovations and projects by the private sector.

Collaboration between governments, the private sector, and civil society is critical. A one-size fits all approach will simply not work as considerations must be provided to local market conditions. By fostering cooperation, we can develop more effective and sustainable solutions for waste management.

Collaboration is also necessary across the entire plastics value chain, starting with plastic makers, converters, final product manufacturers, and retailers in designing products fit for

circularity.

In addition, developing countries require capacity building and social inclusion approaches that engage the three sectors in ensuring a transition to a circular economy. The agreement must recognize the significant contributions of the informal sector and the role waste pickers play in the global waste management ecosystem, taking into account measures taken would contribute to a just transition.

Lastly, any final agreement must allow for a just transition and be based on reliable and objective scientific and economic data and open dialogue amongst all parties impacted.

On Releases and Leakages

Industry supports measures to manage and reduce the release of plastic pellets, flakes, and powder to the atmosphere, soil, water, and the marine environment. We recommend that parties use risk assessments when establishing policies and regulations at the national level.

In addition, we highly recommend the agreement encourage parties to support participation on certified stewardship programs such as [Operation Clean Sweep™](#) to help prevent plastic pellets from entering the environment throughout their manufacturing, conversion, recycling, and distribution stages.

Cluster C

Transitioning from linear to circular economy is key to ending plastic pollution in the environment, recognizing that the circularity of plastics extends beyond recycling. Its viability requires conducive policy and regulatory systems that increase the value of plastic waste and recycled content materials which is critical to unlock investments in innovation, design, and infrastructure, with the essential mobilization of finance, capacity building and technical assistance.

To address plastic waste in the environment, incentives for all steps of the circular chain might be necessary to unlock investments. In that sense, it is important to highlight incentives for:

- innovation investments to secure the development of technologies that can develop new materials and / or new applications easier to recycle (i.e., Design for Environment);
- innovation investments to secure the development of new technologies and production processes (e.g., chemical recycling);
- converting technologies for converters to easily adapt their production processes to receive recycled content feedstock;
- companies engaged on recovery, collection, and recycling of hard-to-recycle materials;
- companies producing easy-to-recycle products;
- distributors and retailers with the establishment of collection initiatives.

Countries at the national and sub-national levels should consider the entire spectrum of available financial instruments – including private sector (private equity and industry

investments), public domestic and multilateral funding, EPR or alike schemes – to ensure the sustained operations of waste management systems.

In addition, removing unnecessary barriers to trade for plastic waste and recycled plastic will facilitate the movement of hard to recycle plastic waste from countries without sufficient recycling capacity to regional hubs that have the capacity to recycle plastic waste in an environmentally sound manner. A good model for aligning the interests of developed and developing countries include approaches that promote economic growth and development while facilitating access to materials, technologies, and supply chains that address plastic pollution. Identifying unnecessary barriers to trade as well as investment barriers to waste management and recycling can help developing countries attract investments that generate jobs and sustainable income while simultaneously preventing waste leakage and plastic pollution.

Industry is already investing significantly and is willing to ramp up investments in plastic recycling infrastructure in coordination with the financing mechanism being considered under the ILBI. A sound policy and regulatory environment is critical to unlocking private sector investment to advance circularity.

Cluster D

The agreement should focus on ending plastic pollution, as clearly stated in the original mandate from UNEA resolution 5/14, while enabling society to continue enjoying the benefits of plastics.

We recognize that the “Aid to negotiations” is an informal reference text that serves as a constructive basis to help member states consolidate, advance, and identify solutions.

The provisions addressing product design, releases and leakages, environmentally sound waste management, national plans, reporting, capacity building, and technology transfer appear capable of supporting further convergence.

To further advance negotiations towards INC 5.4, maintaining a clear focus on the central objective of ending plastic pollution and those areas of convergence is critical. Equally important is establishing a coherent global framework that allows sufficient flexibility for Parties to determine the measures most appropriate to their national circumstances.

In our view, the strongest outcome is one that is science- and risk-based (best way to mobilize capital and investment), technology and material agnostic, supportive of innovation and investment, and capable of broad participation and effective implementation.