

Concern on Plastics Products

Suggested Criteria for Concern on Plastic Products

-Certain plastic products which are not reusable or recyclable in practice or at scale not because of the lack of technology in recycling technology and hardware. (In parity with Article 3 Chair Text Section c)

In first concern there are some exceptions for medical and human health Issue since there are no alternatives and possible solutions for that and these products should be out of the current scope since there are sustainable, affordable and accessible alternatives availability .

-Certain plastic products that can contaminate recycling streams , hindering the recyclability of other material and disrupting the circular economy .(In parity with Article 3 Chair Text Section d)

-Intentionally added Microplastics Products : (In parity with Section e of Article 3 of the Chair's text)

Important note how to find an alternative for current Plastic product

Currently, the draft text does not provide a clear decision-making procedure for how a plastic product would be identified and assessed in the committee.

Given that the proposed criteria are broad and general, the process remains vague, non-transparent, and open to subjective interpretation. Furthermore, the criteria should remain fixed and not varies in the course of time subject to the possible decisions of a subsidiary body under the future treaty. Evolution of criteria are among the critical substantial issues which needs to be dealt with specifically by the COP through consensus and not a specific group of member states present and voting.

To ensure predictability, scientific integrity, and transparency, it is recommended that the decision-making process—along with the roles of relevant bodies, timelines, and procedural steps—be clearly defined within the core text of the treaty, rather than be left ambiguous or solely to annexes by the future COP decisions.

Important note how to find an alternative for current Plastic product

It is therefore recommended to adopt a risk-based approach that includes the development of a risk profile for each product, followed by measures to manage and minimize risks across the entire value chain. In parallel, a comprehensive environmental impact assessment, including Life Cycle Analysis (LCA), and Socio-Economic assessment should be conducted and presented for potential alternatives to the plastic product.

This would ensure that any proposed measures are based on sound science, strong evidences, avoid regrettable substitutions, and support informed, balanced decision-making

Important note how to find an alternative for current Plastic product

For this purpose, relevant information/guidelines should be provided relating to Environmental LCA assessment and socio-economic considerations associated with possible control measures to enable a decision to be taken by the Conference of the Parties. Such information/guidelines should reflect due regard for the differing capacities and circumstances among the Parties and should include consideration of the following indicative list of items:

(a) Efficacy and efficiency of possible control measures in meeting risk reduction goals:

- (i) Technical feasibility; and
- (ii) Costs, including environmental and consumption costs;

(b) Alternatives (products and processes):

- (i) Technical feasibility;
- (ii) Costs, including environmental and health costs;
- (iii) Efficacy;
- (iv) Risk;
- (v) Availability ,Accessibility and affordability

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(C) Positive and/or negative impacts of implementing possible control measures on society:

- (i) Environmental LCA ;
- (ii) Impacts on Agriculture, including aquaculture and forestry;
- (iv) Economic and trade related impacts;
- (v) Movement towards sustainable development; and
- (vi) Social costs;

(d) Waste and disposal

- (i) Technical feasibility; and
- (ii) Cost;

(e) Access to information and public education;

(f) Status of control and monitoring capacity; and

(g) Any national or regional control measures taken, including information on alternatives, and other relevant risk management information