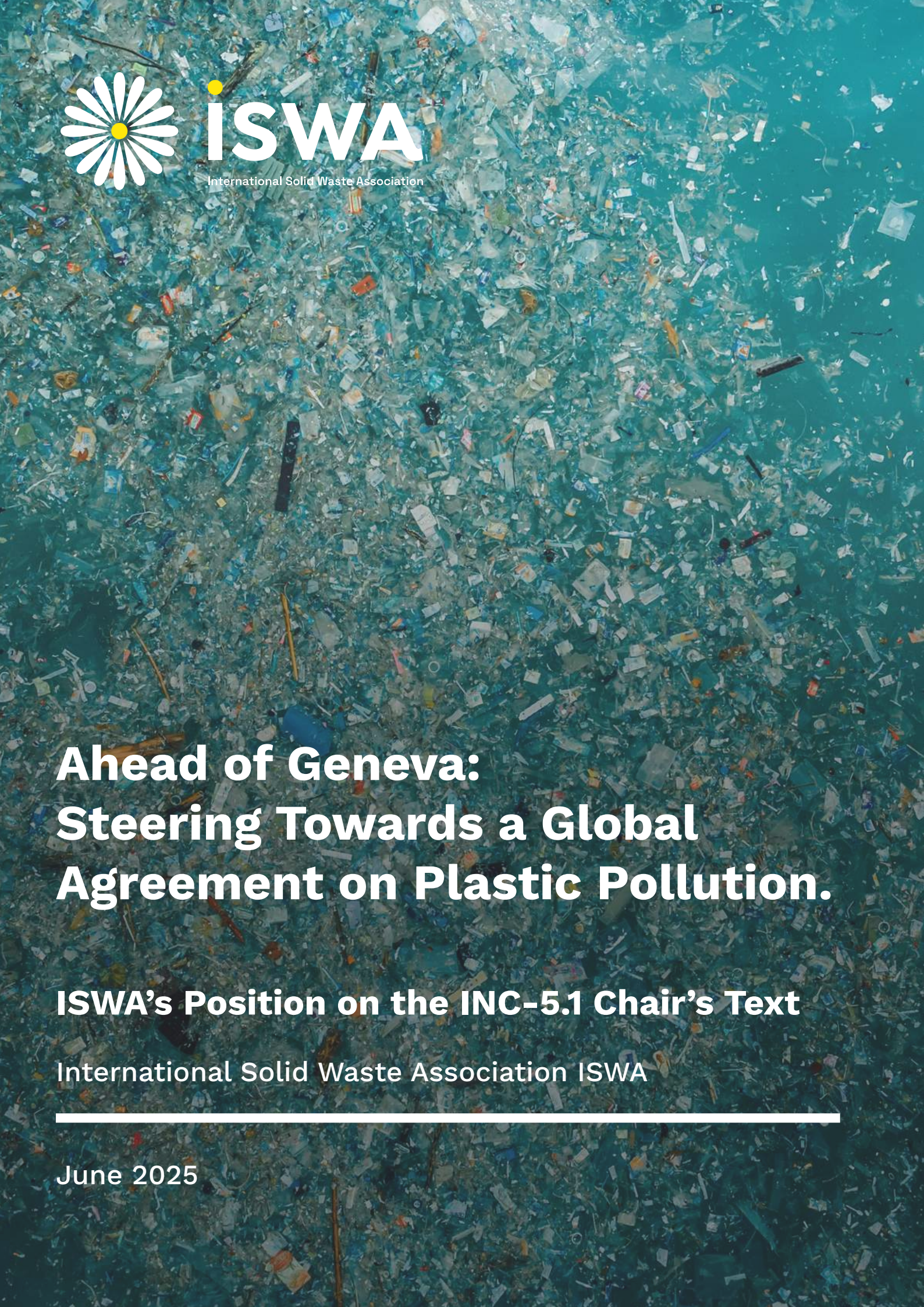

ISWA
International Solid Waste Association

Ahead of Geneva: Steering Towards a Global Agreement on Plastic Pollution.

ISWA's Position on the INC-5.1 Chair's Text

International Solid Waste Association ISWA

June 2025

Foreword

Plastic pollution is a visible and escalating consequence of inadequate waste management. Most leakage into the environment originates as mismanaged macroplastic waste, which fragments into microplastics that are nearly impossible to recover. At the same time, global plastic production continues to rise, while progress toward circularity remains slow and limited in both scale and scope, creating an urgent need for coordinated, ambitious action. Addressing this challenge requires a lifecycle approach rooted in sound waste management, circular economy principles, and shared responsibility across the plastics value chain.

Promoting Sustainable Waste Management Worldwide and a Transition to a Circular Economy

The International Solid Waste Association (ISWA) has a mission to promote and develop sustainable and professional waste management globally, and to accelerate the transition to a circular economy. ISWA supports governments, NGOs, and private sector actors in implementing effective waste management strategies tailored to their specific needs and conditions.

Since the adoption of UNEA Resolution 5/14 in 2022, ISWA has actively participated in every session of the Intergovernmental Negotiating Committee (INC), providing scientific, practical, and evidence-based insights to support the development of a robust and implementable treaty.

This position paper presents ISWA's reflections on the Chair's text concluded at INC-5.1, focusing on four priority areas: circular product design, leakage prevention, effective waste management, and financing mechanisms. Alongside this paper, ISWA is also releasing a technical note, *EPR in the Plastic Treaty: A Road Map for Policy and Commitment*, developed in response to requests from national delegates seeking clear guidance on Extended Producer Responsibility (EPR) systems.

As negotiations approach their conclusion, ISWA remains committed to supporting Parties with constructive, evidence-based contributions that links ambition to implementation, aiming to turn global commitments into real-world results.

ISWA President

Mr James Law

ISWA Plastic Treaty Task Force Leader

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Ms Aditi Ramola, ISWA Technical Director
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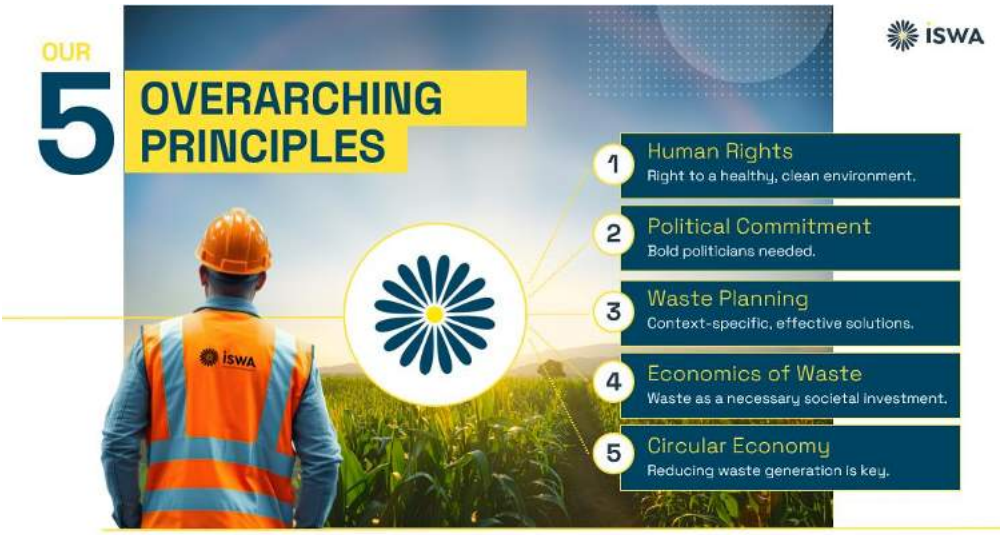
With Contributions of ISWA Members
Dr Arne Ragossnig, ISWA Vice President
Dr Jane Gilbert, Vice Chair, Scientific and Technical Committee
Dr Anne Scheinberg, Chair, Working Group on Recycling and Waste Minimisation
Ms Valeria Branca, Chair, Working Group on Governance and Legal Issues
Ms Corinne Trommsdorff, Vice Chair, Working Group on Governance and Legal Issues

About ISWA

ISWA is a global organisation representing the entire waste management sector. We serve the sector by providing scientific and evidence-based guidance to support stakeholders assess their needs and make well-informed decisions on sustainable waste management and circular economy practices. This foundation is critical for establishing practices and systems that are not only effective, but also adaptable, affordable and sustainable across diverse environmental, social and economic contexts.

With decades of expertise and a growing broad global membership base, ISWA has helped address complex waste challenges through practical, cost-effective and scalable solutions. We support governments and institutions with policy-relevant guidance grounded in proven approaches and adaptable to local realities. These are articulated in ISWA's ***Principles and Guidance for Lasting Change***, a framework built around five core principles that promote human rights, political commitment, effective planning, sound economics, and the transition to a circular economy. These principles, supported by practical recommendations on regulation, financing, technology, and cooperation, are designed to help policymakers deliver sustainable waste systems aligned with broader development and climate goals.

Promoting Sustainable Waste Management Worldwide and a Transition to a Circular Economy



Promoting Sustainable Waste Management Worldwide and a Transition to a Circular Economy

Introduction

The International Solid Waste Association (ISWA) welcomes the Chair's text presented at INC-5.1 as a constructive step forward in the negotiation process. The inclusion of key provisions in clean text, without brackets, represents meaningful progress and reflects the collective will of Parties to move toward an effective and actionable instrument. This clarity offers a strong foundation for INC-5.2.

ISWA recognises that preventing the generation of plastic waste must take precedence over its management. ISWA advocates for scientific, practical, evidence-based, inclusive and lifecycle-oriented approaches to ending plastic pollution through integrated sustainable solid waste management designed to accelerate the transition to a circular economy. Encouraged by this momentum, ISWA offers four reflections on the Chair's text from INC-5.1 to help shape a practical, equitable, and ambitious global legally binding instrument to beat plastic pollution. These reflections, presented in this document, build on ISWA Key Messages for INC-5, which remain fully relevant to the current stage of negotiations. As illustrated in Figure 1, these messages continue to serve as guiding principles throughout ISWA's engagement in this phase of the INC process.

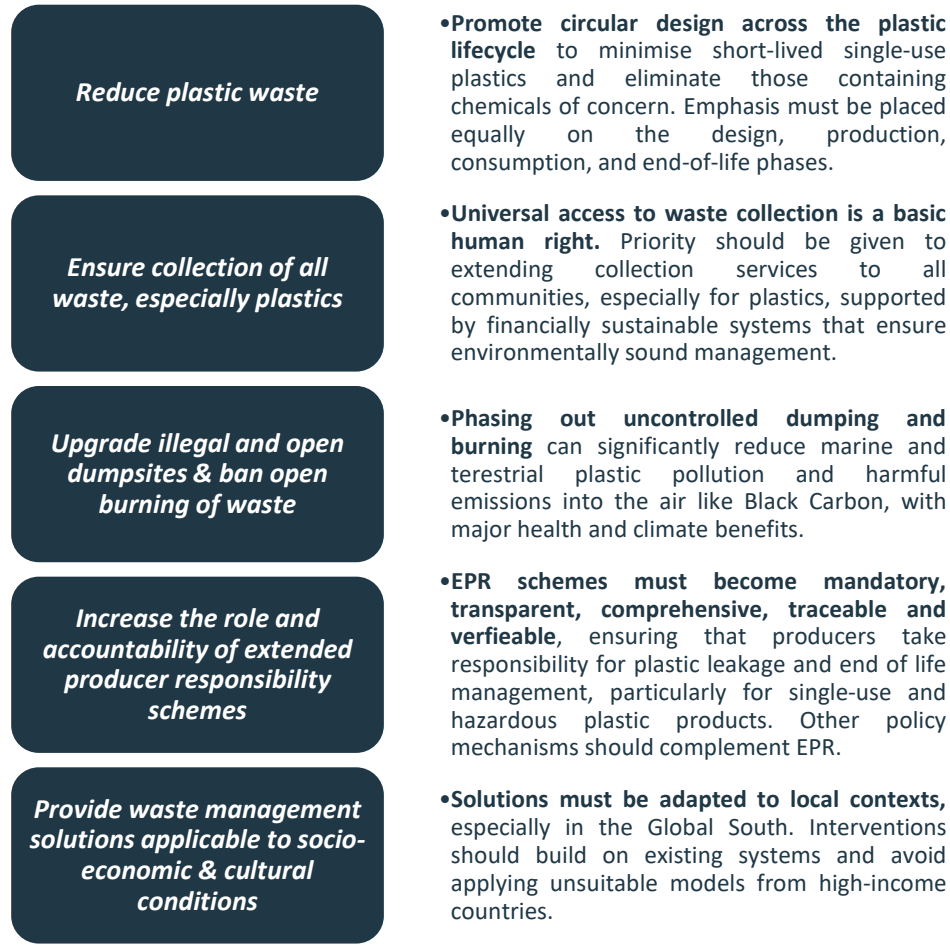


Figure 1. ISWA Key Messages for INC-5: A Lifecycle-Based Approach to Ending Plastic Pollution[1]

[1] Circular design refers to implementing a hierarchy of actions, starting with Refuse, Rethink and followed by 11 more actions, as outlined in ISO Norm 59004.

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1. Addressing Problematic Plastics and Advancing Circular Product Design

Articles 3 and 5 provide a solid framework for addressing problematic plastic products and advancing circularity through design; however, their simplification would enhance clarity, enforceability, and alignment with practical implementation.

The establishment of **Annex Y** is greatly welcomed as a key instrument to identify specific plastic product groups proposed for phase-out under the treaty. Expanding its scope to include persistent chemicals such as PFAS (per- and polyfluoroalkyl substances) would strengthen the treaty's public health and environmental impact.

To reinforce both articles, it would be beneficial to **introduce mechanisms for phasing out problematic plastics, addressing legacy plastic products, and setting per capita plastic reduction targets**. Additionally, promoting a **reduction in the diversity of plastic polymers** placed on the market would facilitate recyclability, improve sorting and treatment efficiency, and support circular economy objectives.

Bans on non-essential single-use plastics (SUPs) are essential and support the inclusion of eco-design requirements, recyclability standards, and the development of sector-specific design guidelines to foster circularity. Nevertheless, such bans should be introduced with caution, avoiding measures that hinder innovation or focus solely on downstream solutions.

ISWA also calls for the **explicit banning of intentionally added microplastics and hazardous substances and oxo-degradable plastics,** and expresses serious concern about other problematic plastic types, such as photodegradable plastics and certain so-called biodegradable or compostable plastics, that do not fully degrade under natural environmental conditions. Furthermore, ISWA encourages the integration of life-cycle assessment (LCA), innovation in material science, and consumer engagement in product design decisions.

Greater **international consistency in product design standards** is essential to avoid regulatory gaps and ensure that all producers, regardless of where they operate, are held to the same expectations. This harmonisation is key to implementing meaningful improvements in plastic products' durability, reusability, and recyclability, and could be achieved through harmonised international (ISO) standards.

Aligning product design measures with robust Extended Producer Responsibility (EPR) schemes that mandate 100% collection for products with chemicals of concern is critical to ensuring that financial and operational responsibility is embedded throughout the plastic lifecycle. **An overarching EPR scheme for all plastic producers**, without limitation to specific product categories, is essential for financing waste management systems, alongside the eco-modulation of the EPR fees to cover full value chain costs. Further emphasis should be placed on **promoting safe and sustainable additives**, including coatings, inks, and adhesives.

2. Preventing Leakage Through Sound Plastic Waste Collection and Containment

ISWA emphasizes that preventing leakage requires universal waste collection and environmentally sound management as core strategies. Integrating clear references in relevant treaty provisions (**Articles 7 and 8**) to these elements, particularly waste collection and containment, would help close critical implementation gaps.

It is equally important to recognise that leakage results not only from sources referenced in **Article 7**, such as plastic pellets, flakes and powders often linked to plastic production, as well as fishing activities, but also from mismanaged waste, including uncollected waste, littering, and inadequate disposal. Thus, the treaty should **obligate Parties to ensure collection of all municipal waste**, with particular attention to plastics, and to upgrade open dumpsites through rehabilitation and integration into formal environmentally sound waste disposal sites. Particular attention should be given to leakage from agricultural plastics and unmanaged waste in rural and informal settings.

The inclusion of **traceability mechanisms** across the plastic value chains, from upstream (design and production) to downstream (capture, cascade processes, collection, recycling and disposal), alongside targeted microplastic prevention measures, and strengthened international monitoring cooperation, would provide a foundation for implementation and continuous improvement. Transparent registers would enable meaningful comparisons between the amounts placed on the market and the effectiveness of downstream waste management systems.

Introducing specific reduction targets for plastic leakage would further help measure progress. This could be achieved by monitoring per capita plastic waste generation or consumption rates to identify real hotspots and guide targeted reduction efforts. Such an approach would also help ensure that countries with relatively low plastic consumption are not unfairly overburdened.

To ensure both effectiveness and fairness, **responsibility for addressing leakage should be distributed across the full plastic life cycle, rather than being placed solely on downstream actors**. Producers must be held accountable for the plastic products they place on the market, so that the cost of managing those products over their life cycle is internalised in products prices, steering business decisions toward less problematic materials.

3. Strengthening Plastic Waste Management Systems

ISWA fully supports the treaty's comprehensive approach to plastic waste management reflected in Article 8, particularly its alignment with the **Basel Convention framework**. This alignment not only reinforces the importance of prohibiting the export of plastic waste to low- and middle-income countries but also provides a solid foundation for promoting global plastic circularity. To this end, **the treaty would benefit from strengthened provisions on the transboundary movement of plastic-rich waste streams**, including waste electrical and electronic equipment (WEEE), textiles, and waste-derived fuels[2]. At the same time, provisions should distinguish clearly between

[2] Refuse-Derived Fuel (RDF) and/or Solid Recovered Fuels (SRF)

waste and legitimate second-hand trade in plastic-containing products such as clothing, electronics, and other durable goods, to avoid unintentionally criminalising reuse and repair activities that support upstream waste prevention.

National obligations should be guided by the waste hierarchy, prioritising upstream waste prevention strategies, followed by reuse, and recycling, supported by **source separation of reusable and recyclable items and materials as the foundation for sustainable waste management systems**. Transparent registers for products placed on the market can support this by enabling accurate tracking of material flows, thereby ensuring effective recycling, safer treatment, and environmentally sound disposal, particularly for SUPs and plastics that cannot be reused or repurposed, against clear recycling targets.

Definitions of recycling and recovery should reflect the diversity of plastic types and the wide spectrum of technologies, while maintaining clarity and integrity to avoid greenwashing. It is essential to recognise that not all plastics can be effectively recycled and recirculated, which reinforces the need to accelerate eco-design innovations, supporting the transition toward a circular economy and advancing steps toward zero waste.

Promoting Sustainable Waste Management Worldwide and a Transition to a Circular Economy

4. Financing the Transition to Drastically Reduce Plastic Pollution and Scaling Implementation

ISWA welcomes the establishment of a dedicated financial mechanism as an essential enabler for treaty implementation, particularly in developing countries. To ensure effective action across the full life cycle of plastics, this mechanism **should support the development of effective and enforceable legislative instruments, as well as infrastructure** for environmentally sound plastic management, including waste prevention, collection, sorting, recycling, resource recovery, disposal, and the broader implementation of EPR systems. Over time, EPR could become a primary financing tool to support these functions. **During this transition, interim financing will be crucial to fill gaps and reduce plastic leakage into the environment**.

Furthermore, **ISWA encourages the use of existing financial mechanisms, such as the Global Environment Facility (GEF) Trust Fund, to manage financial flows under the treaty and avoid duplicating efforts**. The financial mechanism should be guided by the principles of transparency, predictability, effectiveness, and efficiency. It should foster private sector engagement and ensure fair and equitable access to resources across all regions. It must also be responsive to national contexts, particularly where public waste budgets are constrained, and capacity gaps are wide.

Recognising EPR as one of the fundamental financing approaches in **Article 11** and establishing its implementation as an obligation in **Article 8**, would help ensure cost recovery and incentivise circular design. To be effective, all EPR systems should be nationally (or regionally) regulated and progressively built in eco-modulation within the fee structure. **EPR can play a transformative role in developing country Parties**, where public funding often barely covers the cost of basic collection services. By generating dedicated, producer-driven funding, EPR can strengthen waste infrastructure and service delivery without raising user fees or placing additional strain on municipal budgets.

ISWA recommends piloting EPR schemes before full scale implementation, given the complexity of coordinating multiple stakeholders and the potential impacts of the financial model on businesses, consumers and the waste management services. As an interim measure, voluntary schemes maybe introduced, provided they serve as a structured transition towards fully regulated mandatory schemes[3]. **A balanced approach that links international, national, and regional government oversight and support with local authority responsibility and long-term system sustainability will be essential to achieving the treaty's objectives.**

Conclusions

Promoting Sustainable Waste Management Worldwide and a Transition to a Circular Economy

ISWA's reflections highlight the **need for a comprehensive treaty that addresses the entire plastic lifecycle from design and production, to placing on market, traceability of products and packaging, and eco-modulated financing mechanisms that support upstream measures and downstream waste management through harmonised standards, EPR obligations and circular economy principles**. Achieving this requires clear commitments on universal waste collection, the phase-out of problematic plastics, robust traceability systems, and financing mechanisms, and context-appropriate implementation pathways.

As negotiations progress and approach their conclusion, it is critical to ensure that commitments are framed in clear, actionable and verifiable terms that support transparent implementation and monitoring in real-world settings, enabling their integration with national solid waste regulations. Avoiding vague or non-binding language will be key to delivering a robust and operational instrument capable of addressing plastic pollution at scale.

In parallel, ISWA remains fully committed to supporting the treaty process by offering technical expertise, practical insights and implementation experience, as Parties work to finalise a robust and ambitious agreement ahead of INC-5.2.

[3] Refer to ISWA's publication: EPR In the Plastic Treaty: A Practical Road Map for Policy and Commitment