



Observer Written Views

Second Informal In-Person Meeting of Heads of Delegation to the Intergovernmental Negotiating Committee on Plastic Pollution

Submission Date 22 September 2026



Response to the Guiding Questions

Overall Position

Minderoo Foundation welcomes and thanks the Chair for creating a formal opportunity for accredited observers to provide written review ahead of the second informal Heads of Delegation meeting. This willingness to listen will strengthen transparency, assist with coordination across stakeholder groups, and will help bring science and implementation experience into the negotiations. **We encourage the chair and the Heads of Delegation to continue with this spirit of engagement, transparency and leadership through listening as the negotiations enter a critical phase.**

As Parties work towards identifying political landing zones, it is essential that **protection of human health** remains firmly embedded within the treaty itself and is not deferred to future COP decisions. The evidence of harm from plastics, plastic-associated chemicals and micro- and nanoplastics is already sufficient to justify action. Delaying core health protections until after treaty adoption would postpone the benefits of the agreement and risk locking in further harm. The treaty must therefore establish clear upstream obligations that prevent pollution and exposure before they occur, while providing the financial, scientific and implementation architecture needed to accelerate the transition away from harmful plastics. Minderoo Foundation remains convinced that we do not have time to negotiate health protections later. They must be built into the foundation of the instrument from the outset. This aligns closely with Minderoo Foundation's existing positions prioritising human health protections, financing, implementation measures and action across the full plastics lifecycle.

Plastic chemicals of concern present demonstrated or highly probable risks of toxicity, bioaccumulation, persistence, or endocrine disruption to human or environmental health. These include, but are not limited to, bisphenols (e.g., BPA), phthalates, per- and polyfluoroalkyl substances (PFAS), polybrominated diphenyl ethers (PBDEs), and polychlorinated biphenyls (PCBs). Scientific research findings aggregated by the [PlasticHealthAware Dashboard](#) show that human exposure to these chemicals is linked to rising global rates of cancer, infertility, cardiovascular disease, neurodevelopmental issues (like lower IQ and ADHD), and diabetes. **If the treaty does not restrict these chemicals at the point of production, the ongoing global health crisis cannot be curbed.**

Responses to Individual Cluster Questions

Cluster B:

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

Priority should be given to plastic products that pose significant risks to human health and the environment across their full lifecycle, including exposure to hazardous chemicals, microplastics and plastic pollution.

Global measures should focus first on problematic, avoidable and unnecessary plastic products where safer and technically feasible alternatives already exist.

Decisions should be informed by the best available science, including evidence of human exposure, toxicity, environmental persistence, transboundary impacts and potential for harm to vulnerable populations. **The treaty should prevent exposure, not simply manage disposal.**

Plastic products that contribute disproportionately to pollution, leakage or waste generation should be prioritised for global action.

Products should be assessed alongside the chemicals they contain, recognising that product design and chemical safety are inherently linked.

Globally harmonised criteria are needed to avoid fragmented national approaches and provide certainty for governments, industry and investors.

Decisions should be guided by the objective of preventing harm at source, recognising that the most effective form of pollution control is avoiding the production and use of problematic products in the first place.

The treaty should retain a mechanism for regularly updating product lists and criteria as scientific understanding evolves and safer alternatives become available.

2. What type of enabling factors should be considered to address existing and legacy plastic pollution, including the process to identify and evaluate the locations or accumulation zones and subsequent remediation efforts?

Given the highly technical and specialised nature of plastics, the plastics treaty would require binding control measures across the full plastics life cycle, complemented by procedural obligations that support effective implementation. While procedural commitments are important, they are unlikely to provide sufficient direction on their own. **Procedural obligations can support action, but they cannot substitute for it.** Binding measures provide the legal certainty, consistency and technical clarity needed for countries to achieve the treaty's shared objectives. **Without binding measures, ambitions risks becoming aspiration.**

A comprehensive framework for plastic products and product design is central to this approach. Product-related provisions can restrict market access for products deemed unsafe, while product design provisions can determine what is placed on the market in the first place. Both are essential for addressing chemicals of concern. Product provisions can establish restrictions through a negative list approach, while product design measures can define positive lists of chemicals permitted for specific high-risk applications. **The treaty must do more than describe the problem; it must change the market.**

To support implementation and accountability, harmonised methodologies, indicators and reporting frameworks should be developed to ensure consistent, reliable and comparable data across countries. These tools are critical for tracking progress, assessing effectiveness and supporting evidence-based decision-making. **A global problem requires globally comparable data. What gets measured gets managed, but only if it is measured consistently.**

Adequate financing must also be available to support the identification, monitoring and long-term management of plastic pollution. While financing mechanisms are needed across the full lifecycle of plastics, priority should be given to upstream measures that prevent pollution at its source and deliver the greatest long-term impact. **Finance should reward prevention, not simply pay for the consequences of inaction. Every dollar spent upstream reduces the costs borne downstream.**

At the same time, legacy plastic pollution must be addressed. We support efforts to remediate existing contamination, but remediation alone will never solve the problem. **We cannot clean our way out of a crisis we continue to create, particularly in the face of predicted increasing production. Prevention and remediation must proceed in parallel: one addresses the pollution already in our environment, while the other prevents future harm. Remediation addresses the legacy of plastic pollution; prevention determines its future. Cleaning up yesterday's pollution cannot come at the expense of preventing tomorrow's.**

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?

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?

To support global cooperative action on plastics, a financial mechanism is needed to deliver **adequate, accessible, predictable and timely financial resources** to support parties in meeting their obligations. The Plastics Transition Investment Facility (PTIF) provides a model for delivering on these requirements.

Established by the UN Environment Programme, the UN Capital Development Fund and the International Finance Corporation, **the PTIF will mobilise public and private capital at scale to significantly reduce the negative impacts plastic has on human and planetary health**. Its key differentiator is a focus across the entire plastic lifecycle including the scaling of upstream solutions to replace toxic plastic.

The Facility aims to unlock more than US\$1 billion in investment through an innovative blended finance approach, leveraging up to US\$200 million in donor capital to de-risk investments and attract significantly larger flows of commercial finance. By blending public, philanthropic and private capital, PTIF is designed to help mobilise investment into the systems, materials and business models needed to reduce the negative effects plastics have on human and planetary health. Using capital as a catalyst for change, this will ensure the unlocking of the funding needed to bring safer materials, new technologies and transformative solutions to market faster.

Minderoo Foundation is moving forward on these issues with an extensive portfolio of innovation and investment addressing the upstream opportunities to replace fossil fuel plastics. We believe the PTIF can provide a proof point to negotiators on effective financing mechanisms. Policy may set the direction, but financing will set the pace of change.

Minderoo Foundation is proud to support the PTIF through an in-principle founding commitment of US\$5m to help catalyse the shift in products, industries, supply chains and consumer behavior towards non-fossil fuel alternatives. Momentum is developing but urgent action is needed to put these new systems in place.

Minderoo's commitment is a first step, not a final answer. The Facility will only reach its potential if others step forward.

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?

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

Minderoo Foundation supports the inclusion of clear principles and approaches to guide effective implementation of the instrument. These should include **a full life cycle approach, prevention at source, protection of human health, the polluter pays principle, the precautionary approach, transparency, equity, and the use of best available science**. The instrument should make clear that implementation is not limited to downstream waste management, but must address the drivers of plastic pollution across production, product design, chemical safety, consumption, reuse, repair, refill, collection, financing and remediation. This broader approach is consistent with the conceptual frameworks advanced by parties who treat implementation measures as enabling conditions for systemic change, and with those who emphasise principles that can help anchor obligations across the treaty text.

These principles should be reflected operationally in the instrument through obligations, implementation plans, guidance and financial arrangements that help Parties translate high level commitments into practical national action. In particular, the instrument should support harmonised criteria, reporting and monitoring systems; technical assistance and capacity-building; and financial resources that prioritise upstream solutions while also supporting countries to manage existing and legacy pollution.

Actions related to public information, awareness, education and research will be essential to implementation because they build the social, scientific and political conditions needed for the treaty to succeed. Education and research should support evidence-based decision-making, improve understanding of exposure pathways and health impacts, and strengthen the ability of Parties to identify problematic products, chemicals of concern and effective prevention measures. The instrument should therefore include dedicated provisions for accessible public information, independent research, knowledge-sharing, transparency in product and chemical composition, and cooperation with scientific experts, civil society and affected communities.

Closing Statement

Minderoo Foundation thanks the Chair, Heads of Delegation and the wider Global Plastics Treaty community for the opportunity to contribute these observer written views. Across this submission, we have emphasised that the treaty must be grounded in the best available science, protect human health, and establish clear, binding measures that prevent plastic pollution and exposure before they occur. This means addressing plastics across their full lifecycle, including production, product design, chemicals of concern, consumption, financing, remediation and implementation. While remediation of existing and legacy pollution is essential, it cannot substitute for prevention at source. A strong treaty must therefore prioritise upstream solutions that reduce harm before plastics and harmful chemicals enter markets, communities and ecosystems.

Minderoo Foundation reaffirms its support not only for a strong and ambitious treaty, but for one that effectively addresses plastic pollution across the full lifecycle, with particular attention to upstream measures that can deliver the greatest long-term health, environmental and economic benefits. We remain at the disposal of the community involved in the Global Plastics Treaty process to provide advice and support on relevant scientific matters, including evidence relating to human health, chemicals of concern, exposure pathways and effective prevention measures. Minderoo Foundation can be contacted at globalplasticstreaty@minderoo.org.