

Written comments from NAPCOR, an accredited observer organization

Second Informal In-Person Heads of Delegation Meeting — Thailand, 27 to 30 September, 2026
Intergovernmental Negotiating Committee on Plastic Pollution

Date: 22-September-2026

Submitted by: Laura Stewart, Executive Director

Organization: National Association for PET Container Resources

The United Nations Environment Programme (UNEP) plastics treaty presents a critical opportunity to address plastic pollution through pragmatic, science-based solutions that accelerate circularity while preserving access to safe, affordable, and sustainable packaging. The National Association for PET Container Resources ([NAPCOR](#)) represents the North American polyethylene terephthalate (PET) supply chain, including Mexico, the United States, and Canada.

NAPCOR supports policies that strengthen collection, improve recycling infrastructure, and increase recycled content to keep valuable materials in circulation and out of the environment. As delegates consider the path forward, decisions must be guided by full life-cycle impacts, proven recovery pathways, and the practical realities of packaging systems worldwide.

PET packaging plays an essential role in delivering food, beverages, and healthcare products safely and efficiently, while also offering one of the most established and scalable recycling pathways in the plastics economy. As one of the most recyclable and recycled plastics globally, PET plastic demonstrates how material innovation and circular systems can work together to reduce waste, lower emissions, and conserve resources.

NAPCOR urges negotiators to prioritize policies that expand these systems and avoid approaches—such as blanket bans or punitive taxes—that may unintentionally increase environmental impacts and undermine circular economy goals.

PET Plastic Facts

- PET (polyethylene terephthalate, #1 resin identification code) plastic bottles, containers, and packaging are safe, lightweight, resealable, shatter-resistant, and FDA-approved for food contact.
- They are also fully recyclable and can be made with up to 100% post-consumer recycled material.
- Multiple studies, including [NAPCOR](#), [McKinsey & Company](#), [ABI PET](#), [University of Sheffield](#), and [Imperial College London](#), have reached the same conclusion: PET beverage containers also have the lowest emissions compared to alternatives such as glass bottles and aluminum cans for beverage packaging because of their lightweight properties and the low amount of energy required to produce and transport them.
- PET is the most recycled plastic in the world, is recycled at a rate [similar to aluminum cans and glass containers](#), and has a [higher recycling rate than other plastics](#). Globally, [more than 50% of PET bottles](#) are recovered.

Plastic Bans

- Bans or restrictions on PET containers are counterproductive, ultimately [causing more harm than good](#).
- PET beverage containers may be single-serve, but they are never single-use. They are fully recyclable and are designed for endless recycling.
- Research unequivocally supports the idea that PET plastic is the more sustainable option for food and beverage packaging.

Collection Programs

- NAPCOR supports well-designed collection programs, including extended producer responsibility (EPR) programs and deposit return systems, also known as recycling refund programs, as a policy approach that can improve and scale collection, sorting, and recycling systems for packaging and accelerate the transition to a circular economy for PET.
- Negotiators should establish and implement EPR for packaging, in accordance with national circumstances and capabilities, with the objective of supporting the collection, sorting, recycling, and environmentally sound management of packaging and promoting circular product design.
- Such programs should include a clearly defined scope of covered materials and producers, clear roles and responsibilities for relevant stakeholders, transparent reporting and monitoring requirements, effective enforcement mechanisms, and eco-modulated fees reflecting recyclability and other relevant design characteristics.

Design for Recycling

- NAPCOR supports design-for-recycling requirements that facilitate the collection, sorting, and recycling of plastic packaging and promote circularity and the use of recycled materials.
- Negotiators should leverage existing, well-established technical standards and design-for-recycling guidelines, while allowing requirements to reflect regional and national circumstances and recycling system capabilities.
- Negotiators should take measures to ensure that plastic products placed on the market are designed to facilitate their collection, sorting and recycling, with a view to promoting circularity, resource efficiency and the use of recycled materials.
- Negotiators should establish or apply design-for-recycling requirements or criteria, taking into account relevant international, national, or regional technical standards, guidelines, and assessment methodologies.

Safety

- PET continues to be approved for food contact by the [United States Food & Drug Administration](#), [Health Canada](#), the [European Food Safety Authority](#), and food safety agencies around the world.
- Research from [Imperial College London](#) shows that replacing plastic with alternatives increases waste volume, emissions, and energy use.

Microplastics

- There is [no conclusive scientific evidence](#) that microplastics adversely impact human health.
- The PET industry remains dedicated to furthering the two primary recommendations found in the World Health Organization's 2022 report on microplastics:
 - Increase our scientific understanding of microplastics.
 - Eliminate plastic pollution that can become sources of microplastics in our environment.
- Focusing on major sources of microplastics (tire abrasion and washing clothes) is critical to preventing the introduction of these particles into the environment.

The Final Treaty Must Avoid Bans and Taxes on PET Plastic and Provide Flexibility

- We strongly disagree with any policy that taxes PET beverage containers or other PET plastic applications.
- Taxes should be avoided on all plastics, especially those that are more easily recycled, as they would prevent a circular economy.
- Negotiators should take measures to identify and address avoidable or problematic applications of plastic using transparent and evidence-based criteria.
- Such criteria should consider recyclability, leakage risk, necessity, and function, the availability and environmental performance of alternatives, technical feasibility, affordability, national and local circumstances, and the waste hierarchy.
- No application should be subject to restriction solely on the basis that it contains plastic where the application can be effectively collected, sorted, and recycled and where available alternatives would result in greater overall environmental impacts.
- The final treaty should strive for a consensus-based outcome that allows flexibility for member states to achieve goals. A one-size-fits-all approach will not work worldwide, as member states face major differences in infrastructure, access to safe water and other essential goods, and consumer preferences.