

# Ocean Conservancy

## Overall Summary

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Ocean Conservancy's overarching priority is an ambitious and effective legally binding instrument that delivers the mandate to end plastic pollution, including in the marine environment, through a comprehensive approach addressing the full lifecycle of plastics. Mandatory global obligations should provide a minimum for ambition and action while leaving flexibility for how countries implement, achieve or exceed these measures. While the proposed text in the INC Chair's Aid to Negotiations has provided a potential basis for recommending negotiations, we believe it lacks the necessary ambition to achieve the goal of UNEA 5/14: to end plastic pollution.

To achieve this goal, the treaty must not become predominantly a waste-management agreement, which is where we are concerned the current text in the *Aid to Negotiations* is leaning towards. Prevention and upstream source reduction must remain central to the agreement.

In order to fulfill the mandate to end plastic pollution, including in the marine environment, Ocean Conservancy believes the text must include specific provisions for reduction, primary and secondary microplastics, and abandoned, lost or otherwise discarded fishing and aquaculture gear (ALDFG).

## Cluster A

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### 1. What purposes are National Plans expected to serve as a contribution to the achievement of the objectives of the instrument?

The treaty should establish a binding, shared global direction and an agreed level of ambition that applies to all Parties while National Plans should allow each Member State the flexibility in how they achieve or exceed the obligations outlined. In this way, National Plans should serve as the vehicle through which Parties translate binding global obligations into nationally appropriate domestic measures. This allows for a flexibility in means of achieving the objectives, rather than the outcomes of the instrument. Treating National Plans as an alternative to global obligations would leave the instrument without a measurable common floor for assessing progress and achieving the goals outlined in UNEA resolution 5/14.

National Plans should also be capable of strengthening over time, such that Parties can increase ambition and contributions towards global targets as capacity, infrastructure and evidence develop, and resources and finances increase. This also ensures that the plans remain an efficient and consolidated tool for the reporting and effectiveness evaluation cycle described below.

### 2. How could provisions on reporting, implementation and compliance, information exchange, and effectiveness evaluation support the overall implementation of the instrument, and what is the relationship between these articles?

Reporting is essential for transparency, accountability, measuring progress, and identifying gaps to inform future action. Therefore, it is critical that reporting requirements be mandatory. Mandatory reporting is compatible with differentiated

capacity: targeted technical and financial support for developing countries, together with proportionate formats and periodicity, is the appropriate response to uneven national reporting capacity rather than making the obligation itself optional.

The provisions around reporting, implementation and compliance, information exchange, and effectiveness evaluation should be understood as a single, connected implementation cycle that together are critical to achieving the objectives of the instrument:

- National Plans set out intended action to contribute towards global targets;
- Implementation delivers on that action;
- Reporting makes that action transparent and informs accounting for effectiveness; and
- Effectiveness evaluation assesses whether the aggregate of national action is achieving the objective of the instrument.

The resulting findings from this connected cycle of mandatory, no-fault reporting should be used to inform both the strengthening of National Plans and the allocation of support, and not to be used to finger point. The goal of these provisions is ultimately to provide the Conference of Parties with a systemic view of where implementation is succeeding and where gaps and barriers remain.

To enhance capacity, Parties can use existing platforms to help support their national reporting, such as Ocean Conservancy's [TIDES database](#) and the Global Ghost Gear Initiative's [Global Data Portal](#) on abandoned, lost or otherwise discarded fishing and aquaculture gear (ALDFG) and end-of-life gear (EOL).

### 3. What will be the role of information exchange in the overall implementation of the instrument and how can it contribute to its effectiveness??

Information exchange is imperative for effective implementation by facilitating Parties learning from one another and to adopt, adapt and scale approaches that have been demonstrated to work, rather than to require each Party to solve the same implementation problems independently.

For this to be more than data transmission, information exchange should be designed to feed directly into effectiveness evaluation: what is shared should include not only what Parties have done, but the conditions under which measures succeeded, the costs and enabling factors involved, and the results achieved. Standardized approaches to data measuring and reporting will be critical for comparability and will increase the efficiency of implementation and resource mobilisation. The Conference of the Parties can play a critical role in identifying and/or developing standardized tracking and reporting approaches to improve reporting, effectiveness evaluation, and information exchange.

## Cluster B

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

Global mandatory provisions should form the core obligations of the instrument, supported by complementary measures that take account of national circumstances.

The science is clear that addressing the plastic pollution crisis must begin with reducing the amount of plastic produced and used. To end plastic pollution, a global measure to identify sustainable levels of production of plastic (analogous to the global goal to limit global warming to 1.5°C above pre-industrial levels) and global obligation to take measures to achieve this goal is critical. A treaty that lacks a clear pathway to reduce the level of global production fails to meet the mandate of the instrument to end plastic pollution through a comprehensive approach addressing the full life cycle of plastic, including its production, design and disposal.

This global measure would be well complemented by specific measures on plastic productions that disproportionately contribute to plastic pollution and impacts to environmental and human health.

We need meaningful upstream measures that reduce plastic pollution at source, including measures addressing problematic

and avoidable plastic products. Overall [source reduction](#)<sup>1</sup>, or production reduction, continues to be missing from this *Aid to Negotiations*. To avoid projected increases in ocean plastic pollution and reduce it back to 2010 levels of 8 million metric tons (MMT), science shows that by 2030, we need to reduce plastic consumption and usage by 25-40%<sup>2</sup>. Other studies have found that to achieve a roughly 80% reduction in ocean plastic pollution, a 47% reduction (including direct efforts such as elimination and reuse) by 2040 will be necessary<sup>3</sup>. Single-use plastics are the ideal target for *initial* source reduction policies as they represent the types of plastics that are most easily eliminated, replaced by alternative delivery systems (e.g., reuse and refill), or transitioned to more sustainable material types. Data from Ocean Conservancy's International Coastal Cleanup® show that single-use plastics make up a disproportionate amount of marine debris collected along beaches and waterways around the globe each year and that nearly 70% of those single-use plastics collected are not recyclable<sup>4</sup>. Single-use plastics represent nearly 40% of annual plastics production globally<sup>5</sup> and are one of the fastest areas for growth in the sector. This means that a focus on single-use plastics reduction now can have an outsized impact on preventing plastic pollution from across the plastics lifecycle while enhancing the transition to a circular economy. Based on this science, Ocean Conservancy recommends outlining a goal for overall reduction in plastic use and production. The establishment of a global baseline and obligations for reporting by Member States with a broad goal to reduce overall plastic use and production would provide a sufficient and effective legal basis to enable robust future work (e.g., at future COPs) on reducing plastics.

[Microplastics](#)<sup>6</sup> are classified as primary (intentionally manufactured to be small) or secondary (degraded from larger plastics)<sup>7</sup>. Microplastics have been found polluting every marine habitat where scientists have looked. Further, because microplastics are small, lightweight and sometimes airborne when they enter the environment, they move between air, freshwater, land, animals, humans and the marine environment, forming a global microplastic pollution cycle<sup>8</sup>. Research to date shows that secondary microplastics are the most prevalent form of plastic pollution ingested by marine fish, crustaceans, and bivalves (e.g., oysters and clams)<sup>9,10,11</sup>, and the ingestion of both primary and secondary microplastics by animals has been associated with negative health outcomes including reduced food consumption, impaired growth and behavior, decreased reproductive output, reduced energy for growth, altered gene expression and damage to cells and DNA<sup>12</sup>. Given the robust scientific literature on microplastics, Ocean Conservancy appreciates that the *Aid to Negotiations* continues to outline measures to address primary (intentionally added) microplastics in Article 4 as well as secondary (microplastics shed from larger plastics) microplastics in Articles 5 and 6. To ensure this comprehensive approach is maintained, we deem it critical for Article 4 to include products that contain intentionally added microplastics. This should operate alongside provisions that address secondary microplastics and releases across the product life cycle, so that the instrument covers both types of microplastics.

Fishing gear being purposely designed to catch aquatic species, when lost in the environment, [abandoned, lost or otherwise discarded fishing and aquaculture gear](#)<sup>13</sup> (ALDFG) is pound for pound the most harmful form of plastic pollution to marine life<sup>14</sup>. Due to the majority of ALDFG being made of plastic, it is also a significant contributor to ocean plastic pollution, including the proliferation of secondary microplastics. Recent studies indicate that ALDFG represents 46%<sup>15</sup>–86%<sup>16</sup> of all floating macroplastics in the ocean gyres by weight. It is estimated that if current fishing gear loss rates continue, in a little over 60 years there will be enough fishing nets littering the sea to cover the entire planet<sup>17</sup>. Its impacts on aquatic life and habitats are also quite distinct from other forms of marine plastic pollution (i.e. single use plastics). ALDFG also has significant negative consequences for global food security, biodiversity, coastal economies, human health and livelihoods, and has disproportionate impacts on Small Island Developing States and LDCs. As such, ALDFG warrants being specifically addressed within the treaty across its full life cycle from upstream design and production through to end-of-life management and remediation. Whilst Ocean Conservancy appreciates the inclusion of specific text referring to ALDFG within the *Aid to Negotiations* text, its placement in *Article 7 Waste Management* infers ALDFG is solely a waste management issue which is not the case. The current language also falls short in recognising that, in order to “dispose” of ALDFG, it must first be located and retrieved. In order to fulfil the objective of the instrument to protect the environment and human health, and based on the current science, Ocean Conservancy recommends ALDFG must be considered coherently across its full life cycle within the instrument for its prevention, mitigation and remediation. In the current *Aid to Negotiations*, this requires going beyond the waste-management framing as currently reflected and adding specific language under Articles 6, 7 and 8 whilst recognising that plastic fishing and aquaculture gear should be treated consistently as a plastic product across all relevant provisions of the instrument.

<sup>1</sup>Ocean Conservancy, (2023). Opportunities and Impacts of Single-Use Plastic Source Reduction in the Global Plastics Treaty <https://bit.ly/4yfru8M>

<sup>2</sup>Borrelle, S.B., et al. (2020). Science.

<sup>3</sup>Lau, W.W.Y., et al. (2020). Science.

<sup>4</sup>Ocean Conservancy, (2021). We Clean On.

<sup>5</sup>Geyer, R., et al. (2017). Science.

<sup>6</sup>Ocean Conservancy, (2023) Microplastics Facts & Figures <https://bit.ly/4y58UQA>

<sup>7</sup>Rochman, C.M., et al. (2019). Environmental Toxicology and Chemistry.

<sup>8</sup>Gago, J., et al. (2018). Marine Pollution Bulletin.

<sup>9</sup>Lusher, A.L., McHugh, M., and Thompson, R.C. (2013). Marine Pollution

Bulletin.

<sup>10</sup>Rochman, C.R., et al. (2015). Scientific Reports.

<sup>11</sup>Nadal, M.A., Alomar, C., and Deudero, S. (2016). Environmental Pollution.

<sup>12</sup>Anbumani, S., and Kakkar, P. (2018). Environmental Science and Pollution.

<sup>13</sup>Global Ghost Gear Initiative, (2023). The Impact of Fishing Gear as a Distinct Source of Marine Plastic Pollution. <https://bit.ly/4cYu6iK>

<sup>14</sup>Wilcox, C., et al. (2016). Marine Policy.

<sup>15</sup>Lebreton, L., et al. (2018). Scientific Reports.

<sup>16</sup>Lebreton, L., et al. (2022). Scientific Reports.

<sup>17</sup>Richardson, K., et al. (2022). Science Advances.

## 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?

Critically, the term "existing" is time-bound and implies that Article 8 of the Aid to Negotiations applies only to plastic pollution already present in the environment. It may therefore be interpreted as not applying to plastic pollution that enters the environment after the instrument enters into force. Ocean Conservancy strongly recommends retitling Article 8 "Plastic Pollution in the Environment," which would make clear that it applies to all plastic pollution in the environment regardless of when or how it entered, encompassing both existing accumulation and future releases.

More broadly, remediation should complement prevention, not substitute for it. While removing accumulated plastic or legacy lost and abandoned fishing and aquaculture gear from the environment is critical in preventing on-going and future harm, including reducing the generation of secondary micro- and nanoplastics, measures are needed across the full life cycle to prevent plastics from entering the environment in the first place.

On identifying and evaluating locations and accumulation zones, assessments should be conducted to identify potential accumulation locations that have outsized environmental, biodiversity or wildlife impacts (e.g., breeding or nesting areas, critical habitats for endangered species, etc.) or ecosystems where the impacts of plastic pollution compound and are exacerbated by other environmental stressors (e.g., coral reefs under threat from bleaching and rising sea surface temperatures).

On evaluating remediation efforts, assessments should be conducted prior to removal in order to evaluate whether removal is technically feasible and whether intervention could cause greater environmental harm than leaving material in place. Assessments should be conducted to prioritize upstream remediation efforts (e.g., beach cleanups, trash traps, inland cleanups) prior to plastics getting further into ecosystems and the environment where removal may prove technologically, financially, or environmentally impossible, or unsafe. Critically, all of these decisions should be informed by best-available science and where relevant, traditional knowledge of Indigenous Peoples.

Given the disproportionate impact of plastic pollution, and of abandoned, lost or otherwise discarded fishing and aquaculture gear (ALDFG) in particular, on small island developing States and least developed countries, enabling factors should include dedicated financial and technical assistance, monitoring and retrieval capacity, appropriate port and onshore infrastructure, recycling opportunities and regional cooperation arrangements. Specifically, Article 8 should provide a clear pathway for identifying and prioritising areas affected by ALDFG and for facilitating safe and environmentally sound retrieval and management of recovered gear.

We should not continuously invest in removing plastic from the environment without simultaneously stopping additional pollution at source - this is particularly relevant to ALDFG, which can persist in the marine environment, continue to fish and damage habitats (a phenomenon called "ghost fishing"), and move considerable distances from where it was originally lost. Remediation efforts should support, not replace, prevention efforts including reduction in production and consumption.

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

Prevention and upstream source reduction must remain central to the agreement. Improved collection, recycling and environmentally sound disposal are critical tools, but they cannot substitute for preventing waste generation and reducing plastic use at source. Thus, waste management should be treated as an important element of the framework while not being disproportionately weighted.

Because plastic pollution is inherently transboundary, and ALDFG and ocean plastic pollution especially so, cooperation at national, regional and global levels will be paramount. Cooperation on waste management should encompass finance, capacity-building, information exchange, common methodologies and standards, data and reporting, and the sharing and scaling of proven approaches. This cooperation should also extend to waste prevention methods including reuse solutions and alternative delivery methods that reduce plastic production to a globally sustainable level. Cooperation should build on existing work through relevant international and regional organizations, including regional seas programs and regional fisheries bodies, in order to promote coherence and avoid unnecessary duplication of effort.

## Cluster C

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### 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?

Implementation will require that Parties, particularly those most affected, have access to predictable, adequate and accessible financial resources. A well-designed financial mechanism is critical in translating commitments into action, supporting capacity-building, and building confidence across Parties that obligations undertaken can in fact be met.

The instrument should provide for capacity-building, financial support and international cooperation as integrated means of implementation. These are essential for supporting countries with limited capacity and should be designed to foster international cooperation, coordination and mutual assistance in the achievement of the instrument's objectives.

Means of implementation should also enable equitable fulfilment of the agreement and provide for burden-sharing in relation to the harmful effects of plastic pollution. Accessibility matters as much as adequacy: access procedures should be proportionate and workable for countries and implementing actors with limited administrative capacity, since procedural complexity can itself become a barrier to implementation.

### 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?

Responsibility for the costs of preventing, mitigating and managing plastic waste and pollution should be shared with the producers and manufacturers of plastics, following the polluter pays principle. Thus, private-sector financing should be considered critical in achieving the objectives of the instrument.

Private-sector financed mechanisms should include extended producer responsibility schemes with nationally determined targets and eco-modulated fees that incentivize reduction, reuse and upstream redesign. Producer-financed mechanisms of this kind can supplement domestic and international public financing and allow for a more equitable distribution of the cost of implementation. Private finance should not, however, displace public support where such support is required, nor should public resources be used to absorb costs that properly belong to producers.

The financial mechanism should include safeguards on transparency, additionality and conflicts of interest. In particular, and consistent with the precautionary approach, funds associated with implementing the instrument should not flow to technologies that sustain demand for virgin plastic production, including conversion chemical recycling technologies.

### 3. What provisions related to technology transfer could foster international cooperation, considering the capacity differences between countries?

Technology cooperation should be judged by whether transferred technologies are appropriate to local conditions, affordable, maintainable locally and environmentally sound, and whether they are accompanied by the technical knowledge and institutional capacity required for long-term operation.

Priority areas should reflect technology systems that directly reduce overall plastic production (e.g., reuse systems) and where capacity gaps most directly constrain treaty implementation. Technology cooperation must also be subject to the same safeguards noted above: it should advance reduction, prevention and environmentally sound management, and should not be used as a channel for technologies that sustain demand for virgin plastic production, including conversion chemical recycling technologies.

## Cluster D

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### 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?

Ocean Conservancy recommends a harmonious integration of these ten principles to guide the implementation of the ILBI (noting they are not listed in order of priority):

1. **Precautionary and Prevention Principle:** The instrument should advocate for a precautionary approach to plastic pollution, recognizing that measures should be taken to prevent harm to the environment, wildlife, and human health. To this end, it should emphasize the importance of preventing plastics from becoming pollution by addressing the root causes and reducing production.
  - 1.1. This principle should also be applied to incentivizing or funding existing and emerging technologies that help sustain demand for virgin plastic production, such as conversion chemical recycling technologies.
2. **Polluter Pays Principle:** Producers and/or manufacturers of plastics should bear the costs associated with preventing, mitigating, and managing waste and pollution they produce through encouraging extended producer responsibility schemes that require or incentivize reduction, reuse, and upstream redesign.
3. **Science-Based Approach Principle:** Highlight the importance of scientific research, data collection, monitoring, assessment, and the use of the best available science and traditional knowledge in informing decision-making, policy development, and implementation. The principle would underscore the importance of monitoring, evaluating, and quantifying the effectiveness of interventions to track the success of the instrument and maintain accountability while also fostering collaboration across governments and institutions.
4. **Remediation Principle:** Emphasizes the need to address and mitigate the existing and accumulated plastic pollution in the environment (legacy pollution) to prevent on-going and future harm. It should encourage the use of existing networks engaged in cleanup efforts, develop sustainable financing for ongoing remediation, and encourage the integration of citizen science in cleanup efforts as part of tracking and measuring progress.
5. **Life Cycle Approach Principle:** Promote a comprehensive and systemic life cycle approach in addressing plastic pollution, considering the environmental impacts of plastic across its entire life cycle, including feedstock extraction, production, use, disposal, leakage, and encouraging sustainable alternatives and circular economy practices.
6. **Community Centric Principle:** Ensure equitable distribution of the costs and benefits of plastic pollution management, the cumulative impacts on vulnerable communities and the informal waste collecting sector when transitioning to more sustainable materials and practices. This approach should encompass vulnerable and historically marginalized communities, Indigenous Peoples, and countries that may bear a disproportionate burden of plastic pollution and its impacts.
7. **Cooperation and Partnership Principle:** This principle emphasizes the importance of engaging various stakeholders, including governments, civil society organizations, private sector entities, informal waste collectors, and local communities, to share knowledge, best practices, technologies, and financial resources for effective implementation of measures to tackle plastic pollution.
8. **Integration and Synergies Principle:** Promote integration and synergies with existing international and regional agreements and conventions, frameworks, and initiatives related to plastic pollution, climate, and environmental protection to ensure coordination, and avoid duplication or contradiction of efforts, while recognizing the need for an overarching legally binding instrument.
9. **Transparency and Information Sharing Principle:** These are critical for effective decision-making, monitoring, and reporting. The principle of transparency promotes open access to information, data, and research related to plastic production, trade, and pollution. It ensures that relevant stakeholders have access to accurate and timely information, facilitating informed decision-making and fostering public participation in tackling plastic pollution. Furthermore, transparency and standardized data reporting improves compatibility and increases the efficiency of policy implementation and possible resource mobilization.
10. **Sustainable Development Principle:** Recognize the interlinkages between plastic pollution and the UN Sustainable Development Goals (SDGs) by integrating efforts to address plastic pollution with broader social, economic, and environmental objectives in the SDGs and any future iteration of the post 2030 agenda.

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

Public information, awareness, education and research should be treated as important implementation functions. The long-term effectiveness of the instrument depends on the capacity of citizens, institutions and businesses to understand and participate in the transition to new and improved systems.

Research supports implementation in two distinct and vital ways:

- i. By improving understanding of sources, pathways and impacts, including for microplastics and ALDFG, for needed measures; and
- ii. By evaluating whether specific policy interventions are resulting in the desired results. This function is less developed and is critical for effectiveness evaluation.

Citizen science and community monitoring can play a uniquely important role as they sit at the intersection of research and public information and education. Community-generated data (e.g., data collected through Ocean Conservancy's International Coastal Cleanup®) on the composition and distribution of plastic pollution and also the Global Ghost Gear

Initiative's Global Data Portal on abandoned, lost or otherwise discarded fishing and aquaculture gear (ALDFG) and end-of-life gear (EOL) can supplement monitoring, extend coverage to areas national systems do not reach, and provide a consistent basis for tracking change over time. Parties should be encouraged to reflect measurable education, participation and monitoring, including by citizen science programs, in their National Plans, as appropriate to national circumstances.

### 3. Considering the progress achieved so far in the discussions related to issues such as the Secretariat and definitions, does the current formulation in the Aid to Negotiations reflect the level of detail required?

The proposed text in the INC Chair's Aid to Negotiations has provided a potential basis for recommencing negotiations, however, Ocean Conservancy believes it lacks the necessary ambition to achieve the goal of UNEA 5/14: to end plastic pollution.

Global mandatory provisions should form the core obligations of the instrument, supported by complementary measures that take account of national circumstances. To achieve this goal, the treaty must not become predominantly a waste-management agreement, which is where we are concerned the current text is leaning. Prevention and upstream source reduction must remain central to the agreement.

In order to fulfill the mandate to end plastic pollution, Ocean Conservancy believes the text must include specific provisions for reduction, primary and secondary microplastics, and abandoned, lost or otherwise discarded fishing and aquaculture gear (ALDFG).

The objective, preamble and principles and approaches also need to retain sufficient substance to anchor interpretation of the instrument. In particular, the objective should clearly reflect the UNEA 5/14 mandate and its comprehensive approach addressing the full lifecycle of plastics. Streamlining should not result in language that inadvertently shifts the treaty towards predominantly downstream waste management.

There is an important balance between establishing global ambition and allowing flexibility for national implementation, taking into account different circumstances and capabilities. Similarly, while the treaty should avoid being overly prescriptive, too much substantive detail should not be deferred to future COP decisions. The instrument itself needs to establish the core obligations, level of ambition and direction of travel, while allowing technical and implementation details to evolve over time and for different circumstances and capabilities.

In streamlining the text, there are also substantive elements that should not be compromised. In particular, upstream prevention and source reduction should not be traded or minimized relative to downstream waste management and remediation. Both need to be appropriately reflected to maintain the comprehensive lifecycle approach envisioned by the mandate.

Similarly, the existence of other international instruments should not result in gaps or exclusions from this treaty, nor duplicative efforts. The instrument should complement and strengthen existing frameworks, rather than unnecessarily duplicate them or defer responsibility entirely to them. For example, efforts have been made by intergovernmental fora, Regional Fisheries Management Organization (RFMOs), and Regional Fisheries Bodies (RFBs) to address ALDFG, including the UN Food and Agriculture Organization's guidelines for the Marking of Fishing Gear (VGMFG) and the Action Plan to Address Marine Litter from Ships under the International Maritime Organization, however, they are fragmented, largely voluntary, and lack a comprehensive, coordinated global strategy across the entire lifecycle for the prevention, mitigation and remediation of ALDFG.

For definitions, sufficient precision is critical because definitions will determine the scope and consistent application of obligations across the instrument. They should provide legal clarity without becoming so prescriptive that they constrain future implementation or developments in science.

Specifically, microplastics should be captured comprehensively, including both intentionally added microplastics and secondary microplastics generated or released throughout product lifecycles. Similarly, plastic fishing and aquaculture gear should be clearly understood as a plastic product subject to all obligations under the instrument, rather than only being recognised as a waste management issue once it becomes ALDFG. Being the most harmful form of marine plastic pollution, ALDFG warrants specific measures across the full life cycle covering its prevention, mitigation and remediation.

The goal should not simply be achieving a shorter, streamlined text. It should be whether the final text contains sufficient detail to establish clear and ambitious mandatory obligations and provide legal certainty at adoption, while leaving technical and operational matters that need to evolve to future COP decisions, guidance and subsidiary bodies.