

## **Part II**

### **1. Primary plastic polymers**

Iran believes that the source of plastic pollution is primarily the mismanagement of plastic product waste. It is crucial to prioritize the efficient management of plastic product waste to address this issue effectively. Scientific evidence supports this notion, highlighting a significant untapped potential in global plastic waste management. Currently, only 9% of plastic waste is recycled, 19% is incinerated, 50% is landfilled, and 22% is non-collected and mismanaged. There is a substantial opportunity to shift a significant portion of waste from these categories towards recycling.

It is important to consider the various categories of plastic waste management, such as recycling, incineration, landfilling, and non-collected/mismanaged waste. In order to enhance the circular economy and to extend the life cycle of plastics, the recycling industry should be enhanced in order to boost the existing capacity and the potential for furthering plastic waste management. Accordingly, exclusion of the Upstream and the Primary polymer production section from the text, together with the emphasis on improving recycling practices, and its alignment with the goal of sustainable plastic waste management shall be taken into account.

On this section, Iran is in favor of option zero which means no text for any binding obligation on production of primary plastic polymers. Accordingly we do not see a possibility for convergence on such issues as the primary and virgin polymers as well as any restriction on trade and other areas which are beyond the mandate of UNEA resolution 5/14.

### **2. Chemical and polymers of concern**

During today's discussions, we have repeatedly heard from some countries and regional groups that the alternative to polymers is simply other polymers. But we want to emphasize that the mandate of 5/14 is not about replacing one type of polymer with another, but rather focuses on how to reduce plastic pollution with a specific emphasis on marine environments. This highlights the fact that certain countries without access to fossil fuels are exploring technologies for producing biobased and biodegradable polymers. However, it is crucial to carefully assess the environmental implications of these alternatives. While it may appear to be a viable economic solution for those with the necessary resources such as technology, water, and land, it is important to recognize that simply shifting from fossil fuels to biobased materials may not effectively

address the issue of plastic pollution. The primary focus should be on sustainability and long-term environmental impact management, rather than solely economic benefits.

Since hazardous chemicals are already covered and taken care by the (BRS) Conventions, there is no need to duplicate this matter in the future Instrument. Further, It is recommended to include a reference in the text stating that all chemical materials used in a closed loop for the production of polymer in accordance with specific necessary Health, Safety, and Environment standards and requirements, should be excluded from the revised zero draft. Additionally, with regard to the release of toxic chemicals from polymer degradation such as PS or PVC, it is important to know that the list of such chemicals under (POPS RC) of the Stockholm Convention already covers these substances, thus no need to include them in the future Instrument.

On this section, Iran supports option 0 which is no text. In General, any reference and limit of polymers are not beyond the mandate of UNEA resolution 5/14 and since the issue of chemicals is addressed by BRS conventions, we should not copy or duplicate their works here under the new Instrument.

If there are articles that are certainly not on the list of BRS conventions and which are subject to consideration, it is possible to accept the investigation them in the Intersessional work only for the purpose of clarifying the matter rather than making a final decision on them. After presenting the report of the expert meeting on them, the committee will discuss the issue with the presence of member states.

### **3. Problematic and avoidable plastic products, including short-lived and single-use plastic products and intentionally added microplastics**

#### **a. Problematic [plastic products]\*\* and avoidable plastic products [and groups of such products]\*\*, including short-lived and single-use plastic products**

In regard to this provision, we believe that the focus of discussion on avoidable plastic products should be on single-use products, such as drinking water bottles and grocery bags. Scientific research, including Life Cycle Assessments (LCAs), has shown that alternatives like paper and cloth bags may not necessarily be the most environmentally sound or socio-economically beneficial options for replacing single-use grocery bags. The production of biobased plastic alternatives can also have drawbacks, as it often requires more water and land for feedstock, and may lack the necessary infrastructure for recycling and production in many regions of the world.

We believe that managing the problematic plastic products should concentrate on short-lived plastic items, such as irrigation tapes. In this segment, we recommend emphasizing and intensifying recyclability to create a circular economy and establish a win-win approach between producers and users. By prioritizing the recyclability of these products, we can reduce waste, promote sustainable practices, and advance towards a more environmentally friendly and economically beneficial system for all stakeholders involved.

Accordingly, Under this section, we disagree with linking the issue of Problematic and Avoidable plastics to Chemicals and Polymers. SO It is recommended to avoid using the term "Problematic and Avoidable plastics" as it may not clearly indicate what the substitute and their environmental impact in life cycle is. Additionally, rather than labeling an issue as "problematic and avoidable," it is advisable to find environmentally sound management strategies for ensuring more recyclability and circularity of plastic products.

Therefore it is suggested to refer to these items as "Single Use and Short Lived Plastic products" to better convey the intended meaning. So the title is not acceptable to us, In addition, it is important that Parties are encouraged to take measures to manage use of single use and short lived plastic products, identified on the basis of relevant parameters. To achieve this objective based on the availability, accessibility and affordability of the required technologies and ingredients in particular to developing countries, parties shall take into account necessary actions. However, we disagree with any time bound target and all actions of parties shall be nationally determined and country driven in accordance with their national circumstances and capacities of each country.

By reframing our language in this way, we can more effectively communicate the importance of managing single-use and short-lived plastic products and working towards sustainable solutions for reducing the plastic pollutions. Let's focus on promoting awareness and action to minimize our environmental impact and create a more sustainable future.

Accordingly, we support OP1 with some modifications which reads: Each country should consider its unique national circumstances and capabilities, taking into account factors such as climate conditions, environmental considerations, and socio-economic conditions when implementing measures to regulate the production, sale, and distribution of short-lived and single-use plastic products. By adopting tailored approaches based on individual circumstances, countries can work together to reduce plastic waste and promote sustainable practices on a global scale.

**b. [Products containing] intentionally added microplastics**

While nano and microplastics may have the potential to transfer into the body through the use of plastic bottles and cutlery, the quantity required to pose an acute toxic risk to humans is typically substantial compared to other materials. It is important to highlight that alternative materials, such as micro wood or micro quartz, It is cleared that micro wood have carcinogenic effect in human body also quartz micro particle have adverse effect on human respiratory system , so they actually present greater hazards to human health. When considering alternatives to plastics in industries like detergents, cosmetics, and drugs, it is crucial to take into account the potential risks, benefits, availability, accessibility, and affordability of various materials.

Collaborative efforts and scientific cooperation among countries are essential in finding accessible and sustainable replacements for microplastics in these industries. Taking action to reduce or eliminate the use of microplastics is vital. Efforts to reduce plastic waste, promote recycling, and ensure proper disposal of plastics can help mitigate the impact of microplastics on human health and the environment. Therefore, we support Option 1 alt 3

**4. Exemptions available to a Party upon request**

Clearly defining procedures for granting exemptions is crucial under this provision. Exemptions may be granted by the governing body\*, ensuring transparency, impartiality, and scientific basis in their decision-making process. A -verification and validation body (VVB) will play a vital role in supporting the governing body\* in evaluating exemption requests, considering each country's unique circumstances. This approach ensures that decisions are well-informed and fair, fostering trust and cooperation among all parties involved in addressing plastic pollution.

Overall, a strong and well-defined framework for granting exemptions is essential for the success of any regulations aimed at reducing plastic pollution. By establishing clear procedures, promoting transparency, stakeholders can work together effectively to protect the environment and address this urgent global challenge. So we support OP4 bis 2 with some modifications.

**4bis. Dedicated programmes of work**

This program is incomprehensible, and its scope is unclear. Therefore, we cannot accept that. it is true that it is going to be addressed to 4 declared areas but How to process them and the limits and entry into these areas are unclear. Such issues should be discussed after the formation of the instrument and the terms of reference of it. Therefore, it should not be

accepted without specific details. Also as this title is new and there was not in the zero draft, please put it in the bracket.

## **5. Product design, composition and performance**

### **a. [Product [design and] performance]**

Iran believes the objective in this section is to create a product that is easily recyclable. Examples include designing materials with single layers instead of multilayers and avoiding the use of inkjet printing for product marking. By simplifying the material composition and marking methods, the product can be more easily recycled. This approach promotes sustainability and environmental responsibility. So we support option 1 whiteout part a, I mean no reference to reducing demand.

### **b. [[Reduce,]\*\* [reuse], [recycling,] refill and repair of plastics and][Circularity approaches for] plastic products**

Iranian delegation believe the philosophy of product design for recycling focuses on making the recycling process more accessible and efficient. In both Section A and Section B, there are common areas where this philosophy can be applied. By simplifying design elements and considering the materials and marking methods, we can create products that are easier to recycle, ultimately promoting sustainability and environmental responsibility. So we support just para 1 of this part with some modifications.

### **c. Use of recycled plastic contents**

Iran believes that Parties should also promote the use of post-consumer recycled plastic in their procurement processes and support research and innovation in the development of new recycling technologies. Collaboration between governments, businesses, and other stakeholders is crucial to achieve the goal of reducing plastic waste and promoting a circular economy.

By implementing these measures, Parties can contribute to reducing the environmental impact of plastic production and consumption, as well as promote sustainable development and the transition to a more circular economy. This will help to achieve the objectives of the instrument and contribute to global efforts to address the plastic pollution crisis. So we support just para 1 of this part with some modifications..

### **d. Alternative plastics and plastic products**

In this section, it is crucial to evaluate the alternative environmental impacts during the same life cycle stage, such as "Cradle to Grave." By assessing the environmental

consequences of different alternatives at each life cycle stage, we can make informed decisions that minimize negative impacts and promote a more sustainable product design.

By conducting a life cycle assessment and considering the potential environmental impacts at each stage, we can prioritize sustainability criteria such as minimizing energy consumption, reducing waste generation, reducing water and land footprint and promoting circular economy practices.

Also Life cycle studies say that plastic causes least impact in 93% of applications studied that's even with low or no recycling. But when you do recycle, which is done at high rates in many countries, there is a further 70-80% reduction in impact.

The Iranian delegation believes that with significant potential to enhance the recycling sector, there is currently no urgent need for immediate alternatives to plastic products. Additionally, similar alternatives may not be suitable for all countries, as regions have different climates and requirements. So we can accept just option 0 with no text and provisions.

## **6. Non-plastic substitutes**

The Iranian delegation emphasizes the importance of promoting capacity-building and technology transfer initiatives, particularly in developing countries, to support the research and use of safe and sustainable non plastic substitutes. Additionally, it highlights the need for a comprehensive life cycle assessment, ensuring a thorough comparison of the socio-economic and environmental impact across the entire product life cycle. So we can accept just para 4 of this part.

## **7. Extended producer responsibility**

We oppose that the EPR system if any to be put under a stand-alone section in the Instrument and we suggest allocating under waste management section.

Generally the principle of EPR can be applied at the national level based on the discretion of each country, especially if there are existing legal regulations within the country that align with this principle. It is upon the national authority of each country to consider and implement EPR as deemed appropriate. However, the recommendation to require countries producing and exporting raw materials used in plastic industries to pay compensation to an international fund for damages caused by plastic pollution is not acceptable to my country. Each country may have its own considerations and policies regarding such recommendations.

This delegation believes that parties are indeed encouraged to consider establishing and operating fiscal and/or non-fiscal EPR systems based on national circumstances

and capability could include fiscal and/or non-fiscal measures. These systems can incentivize increased recyclability, support higher recycling rates, enhance producer and importer accountability for safe and environmentally sound management of plastic products, and increase public awareness. It is important for parties to determine the most effective approach to implementing EPR systems in line with their national objectives. So Iran supports option1 with some modifications.

## **8. Emissions and releases of plastic throughout its life cycle**

Regarding title, Iran does not accept any references to emissions and leakage, preferring instead to focus on the releases of plastic products and product waste. Our suggestion for title is "Impacts of Plastic Product Releases and Waste".

In this regard Iran believes that to implement these measures effectively, each party needs to develop and implement national plans tailored to their specific circumstances and capabilities. These plans should align with relevant national environmental regulations.

Parties are encouraged to promote scientific and technical innovation to prevent and capture the releases of plastics and plastic products, including microplastics, into the marine environment. This can be achieved by implementing necessary measures in accordance with national plans, based on national circumstances and capabilities, and relevant national environmental regulations. By fostering innovation in this area, Parties can work towards reducing the impact of plastic pollution on marine ecosystems and contribute to a more sustainable environment. So we support option 2.

## **9. Waste management**

### a. [[Plastic] Waste management]

Iran believes that the source of plastic pollution is primarily the mismanagement of plastic product waste. It is crucial to prioritize the efficient management of plastic product waste to address this issue effectively. Scientific evidence supports this notion, highlighting a significant untapped potential in global plastic waste management. Currently, only 9% of plastic waste is recycled, 19% is incinerated, 50% is landfilled, and 22% is non-collected and mismanaged. There is a substantial opportunity to shift a significant portion of waste from these categories towards recycling.

It is imperative to reassess the recycling industry to recognize and leverage the existing capacity for improvement and advancements in plastic waste management. A mechanism should be established to evaluate the infrastructural requirements, such as

financial resources and accessible, affordable and available technologies, necessary for safe and environmentally sound plastic waste management. This involves promoting investment and mobilizing resources to cover financing gaps, as well as incentivizing behavioral changes and raising consumer awareness on sustainable consumption throughout the value chain.

This proactive approach can lead to more sustainable practices and mitigate the detrimental effects of plastic pollution on the environment.

Iran believes that Each Party is expected to take measures on safe and environmentally sound waste management in accordance with their national plans, based on national circumstances and capabilities, and relevant national regulations. Parties may also consider taking additional measures such as investing in waste management systems and infrastructure, promoting investment and mobilizing resources to cover financing gaps, and incentivizing behavioral changes and raising consumer awareness on sustainable consumption throughout the value chain. So we can accept option 1 with some modifications for negotiation.

b. [Fishing gear]

New research indicates that a substantial amount of ocean plastics, particularly hard plastics, may originate from fishing vessels rather than land-based sources. These findings suggest that a significant fraction of floating nets and ropes, accounting for almost 80% of floating plastics larger than 5 cm, could be classified as abandoned, lost, or otherwise discarded fishing gear. This highlights the need for increased focus on addressing the issue of lost gear and implementing measures to prevent the marine pollution caused by abandoned fishing gear.

Iran believes that Each Party, based on its national circumstances and capabilities, should collaborate in implementing effective measures to address the issue of fishing gear. Parties are encouraged to promote synergy and complementarity with relevant initiatives and organizations in their efforts to ensure the safe disposal of fishing gear. Parties are also encouraged to promote education and awareness among fishing industries, collaborate with relevant stakeholders, and support the recycling of fishing gear. By working together and coordinating with existing initiatives and partners, Parties can enhance their actions and achieve more impactful outcomes in tackling the environmental challenges associated with fishing gear.

So we believe that the issue of abandoned, lost, and discarded fishing gear is of crucial and should be a standalone section in the text. We support Option 1 without paragraph 1.c.

## **10. Trade [in listed chemicals[, polymers] and products, and in plastic waste][related measures]**

### a. Trade in listed chemicals, polymers and products

This delegation does not accept any binding agreements regarding trade in polymers. Just regarding chemicals it would be acceptable in line with Stockholm convention.

### b. Transboundary movement of [non-hazardous] plastic waste

my delegation believes that Parties to the Basel Convention shall take appropriate measures to ensure that transboundary movement of plastic waste is done in accordance with the obligations of that Convention. In circumstances where the Basel Convention does not apply, a Party shall ensure that transboundary movement of plastic waste is allowed only after taking into account relevant domestic and international rules, standards, and guidelines.

So in this regard we support sub option 0 with No text.

## **11. Existing plastic pollution, including in the marine environment**

Addressing legacy plastic pollution as the most important source of plastic pollution requires comprehensive strategies that include cleanup efforts, waste management improvements, recycling initiatives, and public awareness. It is essential for governments, industries, and communities to work together to mitigate the impacts of legacy plastic.

Iran believes that Developed country Parties, as the primary beneficiaries of plastic goods throughout history, must assume a leading role in addressing the legacy and current plastic pollution found in the marine environment, including areas beyond national jurisdiction. Parties are encouraged to collaborate in line with the principle of Common but Differentiated Responsibility and undertake actions to evaluate, identify, and prioritize regions impacted by plastic pollution, including accumulation zones, hotspots, and critical sectors in marine environments.

We support op4 bis.

## **13. Transparency, tracking, monitoring and labelling (habibolahi INC3)**

Regarding subparagraph 1.a, chemical composition of chemicals or polymers may disclose some information is under secrecy of patents and producers resists to present

such information. Then we offer more general data about intended ingredients shall be given by producers.

Regarding subparagraph 1.b, tracing chemicals and polymers content is sensible just after their consumption. In this regard, definition of life cycle is limited after the consumption of these ingredients and it can not be extended to before of use. Moreover, chemical concentration after addition to plastics gradually depletes. Then, if the content is regulated and measured at the last step it is added to the plastics, no additional measure is needed because there is certainty that the concentration after last addition is lower than the primary one. In the case of plastics are used to make products, the same scenario could be followed and the last step plastic material is used to produce a product could be enough to know the content and no more measurement is needed after that.

Regarding subparagraph 1.c, we support it but for more efficiency it is proposed to establish a labelling or marketing coding system based on the present coding systems like recycling triangle and developing it. This labels or marks shall be easy and fast to be traced by eye or machines to accelerate and facilitate recycling and not restrict production.

Iran delegation supports paragraph 2 but it does not accept tracking, we exclude polymers and among the chemical and plastic applications we support just products made of them.

Regarding paragraph 3 we believe it must be encouraged and not mandated.