

September 23, 2026

Intergovernmental Negotiating Committee (INC) on Plastic Pollution
United Nations Environment Programme (UNEP)
United Nations Avenue, Gigiri
P.O. Box 30552, 00100
Nairobi, Kenya

Re: PETRA Comments on the Proposed International Legally Binding Instrument on Plastic Pollution

Dear Members of the Secretariat:

On behalf of the PET Resin Association (PETRA)¹, the non-profit industry association representing North American producers of polyethylene terephthalate (PET), we welcome the opportunity to provide comments to the Intergovernmental Negotiating Committee (INC) on Plastic Pollution as it continues negotiations toward an international legally binding instrument on plastic pollution. PETRA shares the Committee's commitment to a circular economy for plastics that protects human health and the environment.

PETRA respectfully submits the following points for the Committee's consideration:

- **Design for Recycling:** To promote the circular economy, the instrument should contain an obligation to implement design for recycling requirements. Negotiating parties should leverage well-defined existing recycling guidelines in Europe, Asia, and the Americas for PET products. PET is the most recycled plastic with collection rates consistently above 30% in North America and 69% Globally. The data demonstrates the importance of design for recycling protocols, strengthening collection and recycling infrastructure, and the implementation of well-defined EPR programs.
- **Extended Producer Responsibility Schemes for Packaging:** EPR schemes at the national level with eco-modulated fees are needed to promote circularity and sustainable product design. Parties should agree on an obligation to implement EPR regulations based on a clearly defined scope of covered materials. The roles and responsibilities of different stakeholders as well as reporting, monitoring and enforcement mechanisms must be included for meaningful impact. This will help countries achieve their objectives of collection and recycling as well as ensure the availability and quality of recycled feedstocks.
- **Avoidable And Problematic Applications of Plastics:** Avoidable or problematic applications of plastic should be minimized to promote the feasibility and economics of waste management systems. The instrument should establish global criteria-based provisions to identify and address avoidable and problematic plastic applications at the country level. These criteria should consider the environmental impact of alternatives and specific local needs as well as the waste hierarchy, prioritizing prevention, resource efficiency, reuse, recycling, and recovery.

PETRA respectfully proposes the following treaty-ready language for the Committee's consideration:

Design for Recycling:

"Each Party shall take measures to ensure that plastic products placed on its market are designed to facilitate their collection, sorting, and recycling, with a view to promoting circularity, resource efficiency, and the use of recycled materials."

Each Party shall establish or apply design-for-recycling requirements or criteria, considering relevant internationally recognized, regional or national technical standards, guidelines, and assessment methodologies.”

Extended Producer Responsibility:

“Each Party shall establish and implement extended producer responsibility schemes 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 schemes 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.”

Avoidable and Problematic Plastic Applications:

“Each Party shall 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.”

PETRA will continue to coordinate with other PET value-chain organizations across Europe, the Americas and Asia so that Members of the Committee see a consistent message from industry. PETRA's central message is that the PET industry supports binding circularity measures and strong collection and recycling systems, while product restrictions should remain criteria-based, evidence-based and informed by full life-cycle environmental performance.

PETRA appreciates the Committee's consideration of these comments and welcomes the opportunity for further engagement as negotiations progress.

Sincerely,



Ralph Vasami
Executive Director
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¹ Our members include APG Polytech USA Holdings, Inc., Alpek Polyester, and Indorama Ventures. Together we represent the largest PET producers in the U.S.