

Written Views in Advance of the Second Informal In-Person Meeting of Heads of Delegation

Intergovernmental Negotiating Committee on Plastic Pollution

Bangkok, 27-30 September 2026

Organization Status

Plastic Free Onlus
Accredited observer organization

Overall approach

Plastic Free Onlus welcomes the opportunity to provide written views on the guiding questions for the second informal in-person meeting of Heads of Delegation. We understand the purpose of the Bangkok discussions to be the identification of areas of convergence, bridging proposals and practical landing zones that can support the second iteration of the Chair's Aid to Negotiations.

From an implementation perspective, the future instrument should combine clear and durable global obligations with sufficient flexibility for Parties to reflect different national circumstances and capacities. It should also ensure that implementation is measurable, supported by adequate finance, technology and capacity-building, and informed by experience from national and local action.

A strong global instrument should establish a common floor for action, not a ceiling for ambition.

Parties should remain able to move further and faster through regional, subregional, bilateral and plurilateral cooperation, including voluntary coalitions of willing or like-minded States, provided that such initiatives are transparent, consistent with the objectives of the Convention and complementary to the multilateral framework. Proven national and subnational approaches should be systematically shared, evaluated and, where appropriate, adapted and scaled.

In line with the Chair's common guiding elements, Plastic Free supports placing core legal obligations, principles, institutional architecture and essential criteria in the Convention itself, while allowing methodologies, detailed guidance, indicators and other technical elements requiring periodic updating to be developed through decisions of the Conference of the Parties.

Cluster A - National plans, reporting, implementation and compliance, information exchange, effectiveness evaluation

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

National Plans should be the principal vehicle through which Parties translate the Convention's global objectives and obligations into nationally appropriate implementation. They should not substitute for global obligations; rather, they should explain how each Party intends to achieve them in light of its national circumstances, needs and capabilities.

The Convention should establish a limited set of common minimum elements for National Plans, including:

- national priorities, targets and timelines;
- measures to prevent releases and leakages and to address priority plastic products, where relevant;
- waste prevention, collection and environmentally sound management strategies;
- measures addressing identified pollution hotspots and legacy pollution;
- education, public awareness and stakeholder participation;
- financing, capacity-building and technology needs; and
- indicators that allow implementation and progress to be assessed over time.

A useful bridging approach would be to agree globally on these minimum elements and expected outcomes, while leaving Parties flexibility to determine the policy mix used to achieve them. National Plans should also be capable of progressive strengthening. Article 13 already allows Parties to adjust their plans to enhance ambition and encourages collaboration on subregional and regional plans; these features should be retained.

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?

These provisions should operate as one coherent implementation cycle rather than as separate institutional processes: National Plan -> implementation -> reporting -> effectiveness evaluation -> support and corrective action -> strengthened National Plan.

Reporting should provide sufficient comparable information to understand progress and implementation gaps, without creating disproportionate administrative burdens. Core reporting requirements should therefore be set at treaty level, while format, periodicity, indicators and technical guidance can be developed and updated by the Conference of the Parties.

The implementation and compliance mechanism should remain facilitative, non-punitive and expert-based, as reflected in Article 12 of the current Aid to Negotiations. Its value should lie in identifying barriers, supporting Parties in addressing them and bringing systemic implementation challenges to the attention of the Conference of the Parties.

Effectiveness evaluation should draw on national reports, compliance-related information, scientific and socio-economic evidence, and information exchanged under Article 16. It should assess not only whether Parties have taken measures, but whether the Convention is producing measurable progress in preventing and reducing plastic pollution.

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 should be understood not merely as data transmission between Parties, but as a mechanism for accelerating implementation, cooperation and policy learning. Plastic Free welcomes the language in Article 16 encouraging Parties to learn from and build on existing processes, initiatives and networks, including examples of replication and scale-up of sustainable solutions.

The online platform envisaged under Article 16 should therefore function as a practical global implementation and learning platform. It could make accessible:

- proven national and subnational policy and regulatory approaches;
- successful prevention, reuse, collection and waste-management models;
- monitoring methodologies, citizen-science approaches and locally generated evidence;
- technological and community-based solutions;
- implementation costs, enabling conditions and lessons learned; and
- examples of successful replication, adaptation and scale-up.

The value of a successful practice lies not only in showing that a solution works somewhere, but in understanding why it works, under which conditions, and what is required for it to work elsewhere.

The Convention should also recognise the value of regional and subregional arrangements, bilateral and plurilateral initiatives, and voluntary coalitions of willing or like-minded States. Such initiatives can act as laboratories for implementation by testing solutions, harmonising approaches and developing higher levels of ambition. Successful approaches can then inform broader implementation under the Convention and, where appropriate, future decisions of the Conference of the Parties.

To avoid duplication, the product-measures platform envisaged in Article 4 and the information-exchange platform envisaged in Article 16 should be integrated or made interoperable within a coherent digital architecture maintained by the Secretariat.

Cluster B - Releases and leakages, existing and legacy pollution, plastic waste management, product design and plastic products

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

The criteria already reflected in Article 4 of the Aid to Negotiations provide a useful basis for convergence. Decisions should be guided by transparent, science-based criteria that capture both the environmental risk of a product and the feasibility and consequences of possible measures.

Relevant considerations should include:

- likelihood of release or leakage into the environment;
- risks to the environment and, where supported by evidence, human health;
- reusability, durability, repairability, recyclability and the product's compatibility with circular systems;
- necessity and intended use;
- availability, affordability and accessibility of alternatives;
- socio-economic impacts and implications for a just transition;
- the presence of chemicals of concern or intentionally added microplastics where relevant; and
- the best available scientific information and relevant local knowledge.

The Convention should retain the core criteria and decision-making mandate, while more detailed methodologies, product-specific guidance or reviewable measures could be developed through the Conference of the Parties. This would combine legal predictability with the ability to respond to new scientific evidence, innovation and changing market conditions.

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?

Action on legacy pollution should complement, and never substitute for, measures that prevent new pollution. The first enabling step should be a common but adaptable approach for identifying and prioritising affected locations and accumulation zones.

Prioritisation could consider:

- environmental sensitivity and impacts on biodiversity and ecosystems;
- risks to communities, livelihoods and human health;
- proximity to rivers, coastlines and other major leakage pathways;
- volume, type and persistence of accumulated plastic waste;
- abandoned, lost or otherwise discarded fishing and aquaculture gear where relevant;
- technical feasibility and expected environmental benefit of remediation; and
- the likelihood of re-accumulation if upstream sources are not addressed.

National authorities should be able to combine formal monitoring with data from local governments, civil society, academia, communities and citizen-science initiatives, subject to appropriate quality standards. Remediation plans should connect clean-up with source prevention, infrastructure, community engagement and improved waste-management systems. Removing waste without addressing the pathways that continuously recreate the accumulation is neither efficient nor durable.

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

Cooperation should recognise that Parties begin from very different levels of infrastructure and institutional capacity. In some countries the priority is improving circularity and resource efficiency within mature systems; in others the immediate need is access to basic collection, sorting and safe disposal.

The Convention should therefore establish common environmental outcomes and safeguards while enabling nationally appropriate pathways. International cooperation should support the waste hierarchy and, in particular:

- waste prevention and reduction;
- reuse, refill and improved product design;
- reliable collection and sorting systems, including in underserved areas;
- environmentally sound recycling and treatment;
- prevention of open dumping, open burning and leakage into rivers and marine environments;
- extended producer responsibility and other appropriate economic instruments;
- capacity-building for national and local authorities; and
- the inclusion and protection of informal workers where relevant.

Investment in prevention and collection infrastructure should receive attention comparable to downstream treatment. Cooperation should also facilitate peer learning between Parties that have successfully implemented specific instruments and Parties seeking to adapt them to different economic and institutional conditions.

Cluster C - Capacity-building, technical assistance, technology transfer, international cooperation and financial resources

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?

The financial architecture should be adequate, accessible, predictable and timely, and should support the full implementation chain rather than a narrow set of downstream activities. Public finance will remain essential, particularly where basic infrastructure and institutional capacity cannot be delivered through market mechanisms alone.

Financing should be capable of supporting:

- prevention and reduction measures;
- collection, sorting and environmentally sound waste-management infrastructure;
- institutional capacity, monitoring and reporting;
- education, public awareness and community participation;
- research, innovation and appropriate technology;
- remediation of priority legacy-pollution hotspots; and
- technical assistance and enabling activities required for implementation.

The mechanism should mobilise public, multilateral, bilateral and other appropriate sources while also leveraging additional private finance. Access procedures should be proportionate and workable for countries and implementing actors with limited administrative capacity. Excessive complexity can itself become a barrier to implementation, particularly for local and community-level action where relatively modest resources may generate significant impact.

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?

The private sector should be an important contributor to implementation, while private finance should not substitute for public support where such support is required, nor should public resources primarily replace responsibilities that appropriately belong to producers and other economic actors.

Private-sector participation can include:

- extended producer responsibility and other producer-financed mechanisms;
- investment in reuse, refill, redesign and circular systems;
- support for collection and recycling infrastructure;
- research, innovation and dissemination of environmentally sound technologies;
- technical expertise and capacity-building; and
- transparent contributions to prevention and remediation programmes.

The financial mechanism should include safeguards on transparency, additionality, environmental integrity and conflicts of interest. Private-sector engagement should be linked to measurable implementation outcomes and should support, not weaken, the polluter-pays principle.

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

Technology cooperation should focus not only on transferring equipment but on ensuring that technologies are appropriate, affordable, maintainable locally, environmentally sound and accompanied by the technical knowledge and institutional capacity required for long-term operation.

Technology needs assessments, regional capacity hubs, joint training and South-South as well as North-South cooperation can help match solutions to local conditions. Article 11 already recognises regional, subregional, national, multilateral, bilateral and partnership approaches; this flexibility should be retained and actively used.

International cooperation under the Convention should not be understood as occurring only through centralised mechanisms. Regional, bilateral and plurilateral cooperation, including voluntary coalitions of willing Parties, can provide complementary pathways for technology transfer, capacity-building and implementation. Such cooperation should remain transparent, avoid duplication and be consistent with the Convention's objectives.

Parties that have developed effective policies, technologies or implementation models should be encouraged to enter voluntary partnerships with Parties interested in adapting them. Coalitions of willing Parties can also pioneer common standards, methodologies or implementation approaches that, once evaluated, may inform wider action.

Cluster D - Preamble, objective, principles and approaches, definitions, just transition, public information, awareness, education and research, Secretariat and final provisions

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?

The Convention should contain a concise set of principles and approaches capable of guiding interpretation and implementation over time. These should be sufficiently clear to influence National Plans, financial decisions, product measures and implementation, rather than remaining only declaratory.

Relevant elements include:

- prevention of pollution at source;
- the precautionary approach;
- the polluter-pays principle;
- science-based decision-making;
- a life-cycle approach to plastic pollution;
- resource efficiency, circularity and the waste hierarchy;
- protection of human health and the environment;
- meaningful public participation and access to information;
- just transition and attention to disproportionately affected groups; and
- recognition of different national circumstances and implementation capacities.

A useful point of convergence is that prevention and remediation are complementary but not interchangeable. Clean-up and waste management are necessary, but they cannot by themselves compensate for continuously increasing releases, leakage and avoidable waste generation.

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

Public information, awareness and education should be treated as core implementation functions. Infrastructure and regulation are indispensable, but long-term effectiveness also depends on the ability of citizens, institutions and businesses to understand and participate in the transition.

Article 17 should be linked more explicitly to National Plans under Article 13 and reporting under Article 14. Parties should be encouraged to include measurable education and participation actions in their National Plans, with implementation indicators appropriate to national circumstances.

Such actions can include:

- environmental education in schools and communities;
- public information supporting responsible consumption, reuse and disposal;
- training for public authorities and local actors;
- meaningful participation of young people and community organisations;
- public access to relevant environmental information;
- citizen-science and community monitoring programmes; and
- research on pollution pathways, impacts, alternatives and the effectiveness of policy interventions.

Education should move beyond awareness towards agency: enabling people and communities to understand both the problem and their capacity to contribute to solutions.

Civil society organisations, local authorities, academia and communities should be recognised as implementation partners capable of generating evidence, mobilising participation, testing solutions and translating international commitments into measurable local action.

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 current formulation provides a useful basis, but a limited degree of additional clarification would improve legal certainty and implementation coherence.

On definitions, the Convention should avoid an extensive catalogue of technical terms that may rapidly become outdated. At the same time, terms that directly determine the scope, application or meaning of substantive obligations should be defined with sufficient precision to avoid materially different interpretations by Parties. The objective should be the minimum set of legally relevant definitions required for consistent implementation. More technical or evolving terminology can be addressed through annexes, guidance or subsequent COP decisions.

On the Secretariat, the functions in Article 20 provide an appropriate institutional basis. Greater coherence could nevertheless be created between Article 20 and the implementation provisions elsewhere in the instrument. In particular, the Secretariat could be explicitly enabled to facilitate:

- the information-exchange platform and its interoperability with other Convention-related digital tools;
- public access to National Plans and national reports;
- dissemination of proven national and subnational approaches and implementation lessons;
- connections between Parties seeking to replicate or adapt successful approaches; and
- coordination with relevant international, regional and subregional initiatives and networks.

This would give the Secretariat a facilitating and connecting function in addition to its administrative role, while keeping it fully under the guidance of the Conference of the Parties.

Cross-cluster bridging proposals

Across the four Clusters, Plastic Free sees several practical areas where convergence may be achievable without requiring Parties to resolve every outstanding policy difference at the same time:

- Place core obligations, principles, essential criteria and institutional mandates in the Convention, while leaving technical guidance, detailed methodologies and periodically updated indicators to COP decisions.
- Use National Plans as implementation vehicles for global obligations, with common minimum elements but flexibility in the choice of national policy instruments.
- Treat reporting, implementation and compliance, information exchange and effectiveness evaluation as one coherent implementation cycle.
- Create an integrated knowledge architecture that connects national plans, reports, product measures, proven policy approaches, implementation lessons and scalable solutions.
- Recognise regional, bilateral and plurilateral cooperation - including voluntary coalitions of willing or like-minded States - as complementary accelerators of implementation and higher ambition.
- Systematically evaluate successful national and subnational approaches for adaptability and replication rather than assuming that one model can be transferred unchanged across contexts.
- Ensure that remediation of legacy pollution is coupled with source prevention and infrastructure so that clean-up does not become an endlessly repeated response to the same leakage pathways.
- Design finance, technology transfer and capacity-building around actual implementation barriers, especially where basic waste-management systems and local institutional capacity remain limited.

Concluding observation

The future instrument will ultimately be judged not only by the ambition of its text, but by whether it changes what happens on the ground. Plastic pollution crosses borders, rivers and oceans, while the capacity to prevent and manage it remains highly uneven.

A workable landing zone should therefore combine common global direction with differentiated implementation support: clear obligations where collective action is necessary; flexibility in nationally appropriate means of implementation; strong financial, technical and capacity-building mechanisms; and pathways for Parties that wish to cooperate at higher levels of ambition.

The Convention should be capable of learning. Effective national and local solutions, regional cooperation and voluntary intergovernmental initiatives should feed back into the multilateral system so that what works can be understood, adapted and scaled. In this way, the global framework can provide a common floor while continuously raising the collective capacity to prevent plastic pollution.

Reference documents considered

- Chair's Guiding Questions for the second informal in-person meeting of Heads of Delegation, 9 September 2026.
- Aid to Negotiations - informal reference document by the INC Chair, 8 August 2026.