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Response to the Chair's Guiding Questions ahead of the Second Informal In-Person Meeting of Heads of Delegation to the Intergovernmental Negotiating Committee on Plastic Pollution

Bangkok 27–30 September 2026

Sufficiency First: A Sectoral Approach to Construction, Textiles and Food Systems

The Saudi Green Building Forum (SGBF) welcomes the opportunity to submit its views as an observer in response to the Chair's guiding questions. Supported by Atlantic State Legal Foundation, Human Environmental Association for Development, and Vamos Todos Ecotourism and Welfare, this contribution focuses on preventing plastic pollution through resource sufficiency, responsible material use, and coordinated governance across construction, textiles, and food systems. SGBF brings its experience in the built environment to this work and invites collaboration with specialists in textiles, food systems, health, and waste management.

SGBF proposes common pollution-prevention obligations supported by nationally appropriate sectoral measures. Sufficiency complements efficiency and circularity by examining whether material demand is necessary, equitable and within environmental limits. It permits increased provision where essential needs remain unmet while addressing excess. A sectoral approach translates these principles into measures suited to different products, services and supply chains, with safeguards for housing, clothing, food safety and nutrition.

Cluster A | National plans and implementation

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

National plans should translate agreed obligations into funded actions with clear responsibilities, baselines and timelines. They should connect environmental authorities with municipal planning, construction regulation, textile and food-sector institutions, procurement and waste services. Sectoral roadmaps should identify priority uses, responsible actors, implementation needs and measurable outcomes.

Sectoral measures should address avoidable demand alongside product safety and waste management, with flexibility in delivery that preserves common obligations and essential services.

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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 connect implementation, evidence, evaluation and corrective support. Reporting should distinguish actions taken from outcomes achieved, using absolute quantities alongside intensity indicators.

Proposed construction indicators include plastic materials purchased, packaging and offcut waste, quantities safely reused, documented waste destinations and, where measurable, releases.

For textiles, proposed indicators include product service life, repair and reuse, synthetic-material waste and fiber releases where reliable measurement is available.

For food systems, indicators should cover packaging quantities, reuse, collection and relevant agricultural plastic losses, alongside food loss and waste.

Common boundaries and methods are needed to avoid double counting. Facilitative review should identify both implementation gaps and unmet support needs.

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 make procurement models, material data, safe reuse practices and implementation costs accessible to public authorities and practitioners. Shared examples should explain local conditions, limitations and verification methods so others can assess their applicability. Reporting and exchange should use compatible formats and draw on existing systems where appropriate.

An example of applied regional practice is the **saaf® Conformity Assessment Scheme**, governed by SGBF, which provides guidance and an evidence-based framework for green building conformity assessment and certification. Its approach connects water, energy, materials, infrastructure and human experience with defined requirements and contextual conditions. Experience from saaf® can inform professional guidance, documentation and verification practices. Any application to plastics-specific requirements would require appropriate criteria, data and validation.

Cluster B | Products, releases and waste management

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

SGBF proposes a material-need assessment that begins with the service a product provides and examines whether demand can be avoided or reduced while maintaining safety and function. It should operate alongside assessment of hazardous constituents, releases, environmental impacts and the availability of safe alternatives.

Across the three sectors, common assessment criteria should consider:

- **Necessity and quantity:** whether the specified use and amount respond to a demonstrated service need, including opportunities to avoid unnecessary packaging, over-specification, premature replacement and avoidable single-use applications.
- **Safety and performance:** fire safety, public health, durability, climatic suitability and the whole-life consequences of alternatives.
- **Design and maintenance:** repairability, replacement frequency, safe disassembly and opportunities for reuse.
- **Pollution pathways:** losses during transport, installation, use, renovation and demolition, including potential microplastic releases where relevant.
- **End-of-life feasibility:** material identification, separation, collection and environmentally sound treatment under realistic local conditions.

A bridging approach would establish common essential criteria and a clear mandate for measures, while enabling differentiated implementation timelines and targeted support. Detailed sectoral methods could be developed through decisions of the future Conference of the Parties to the plastics agreement. Long service life should inform assessment without becoming an automatic exemption from pollution prevention.

Regional and national conditions should guide application of these criteria. Where generic technical assumptions do not reflect local realities, evidence-based regional approaches should take precedence in selecting implementation measures, while delivering agreed environmental objectives and safety requirements.

In hot-arid environments, assessment should account for heat, ultraviolet exposure, water scarcity, cooling needs, service life and available maintenance and waste-management systems. Cultural practices, household needs, national building codes and local construction methods should inform construction decisions. Textile measures should consider clothing needs, cultural practices and laundering conditions; food measures should account for hygiene,

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nutrition, storage, distribution and local food practices. Alternatives should demonstrate suitability under their intended operating 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?

Identification should combine municipal records, site surveys and community knowledge to locate construction-related dumping, mixed demolition waste and accumulation along drainage and water pathways. Prioritization should consider exposure, ecosystem sensitivity, continuing leakage and the feasibility of safe remediation. Inventories should distinguish materials still in service from discarded materials and environmental contamination.

Enabling support should cover assessment, characterization of hazardous materials where relevant, safe handling, treatment capacity and monitoring. Remediation should be linked to source controls and responsible waste destinations to prevent recontamination. Coordination among planning, water, infrastructure and environmental authorities should guide action, with safeguards against transferring pollution elsewhere.

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

Cooperation should support prevention, safe reuse, segregation and traceable waste management through shared construction specifications, renovation and demolition audits, workforce training and regional technical exchange. Procurement and producer take-back arrangements, where appropriate, can connect suppliers with end-of-life responsibilities.

Support should address gaps in basic collection and treatment as well as opportunities for improved circularity, protecting workers and maintaining essential services.

Cluster C | Finance, capacity and technology cooperation

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?

Finance should respond to the implementation needs identified in national plans, with predictable public support for institutional capacity and essential infrastructure. It should cover pollution prevention at the planning and procurement stages as well as collection, treatment and

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remediation. Municipalities need support for project preparation, material inventories, monitoring and procurement skills, not solely equipment.

SGBF proposes assessing investments against demonstrated service needs and expected pollution-prevention outcomes. Infrastructure capacity should be aligned with actual demand. Funding arrangements should track results and support needs, with proportionate access procedures for institutions with limited administrative capacity.

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?

Manufacturers, developers, contractors, textile producers, food businesses, retailers and suppliers can contribute through product redesign, material disclosure, reduced packaging, safe reuse systems, take-back arrangements and workforce training. Clear procurement requirements and predictable policy can help translate these contributions into investment.

Financial arrangements should provide transparent responsibilities and safeguards against unsupported environmental claims. Where appropriate, producer responsibility can support collection and end-of-life costs. Private contributions should complement necessary public support and be assessed against documented outcomes. Assistance to small and medium-sized enterprises should help them meet data, design and material-management requirements.

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

Technology cooperation should pair appropriate equipment with practical knowledge, training, maintenance and institutional capacity. Priorities for the built environment include material identification, traceability, safe separation, repair, reuse and environmentally sound treatment. Selection should reflect national needs, local operational capacity and climatic conditions.

Regional partnerships among municipalities, professional bodies, universities and industry could test approaches and share results. Digital tools can assist material-flow analysis and procurement decisions, but should remain subject to transparent methods, data-quality controls and human accountability. Cooperation should include accessible methods for institutions with limited digital capacity.

Technology cooperation should strengthen regional expertise and local innovation through joint testing, professional training and adaptation to national standards and operating conditions.

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Recipient institutions should participate in defining needs and evaluating suitability. Regional experience, including guidance developed through schemes such as saaf®, could support this exchange, subject to transparent assessment of applicability and performance.

Proposed interim work

SGBF invites consideration of a dedicated technical workstream on sufficiency-based material assessment and procurement guidance for construction, textiles and food systems. A mandate from the Diplomatic Conference could initiate this work for consideration by the Conference of the Parties.

Proposed outputs are:

- A model material-need assessment.
- Adaptable procurement criteria.
- A minimum dataset and reporting template.
- Sector-specific pilot evaluation protocols addressing service needs, safety, local suitability, costs and pollution-prevention outcomes, including food loss and fiber releases where relevant.

The mandate should specify responsibilities, a timetable and opportunities for regional participation without prejudging unresolved negotiations.

Cluster D | Principles, knowledge and institutions

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?

SGBF encourages sufficiency as a practical approach complementing prevention, precaution, life-cycle thinking, resource efficiency, circularity and a just transition. Sufficiency describes a balanced condition in which demand remains necessary, equitable and appropriate to environmental and infrastructural limits while maintaining well-being, prosperity and ecological integrity.

This approach should be expressed through practical provisions on product assessment, national plans, procurement and finance. Safeguards should prevent both excess and underprovision, protecting adequate housing, essential infrastructure, safety and service access. Nationally appropriate measures should implement agreed obligations while accounting for different capacities and development needs.

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SGBF emphasizes contextual appropriateness: common global objectives should be implemented through measures grounded in regional environmental conditions, cultural practices, national development priorities and institutional capacities. Global guidance should allow justified local adaptation, supported by transparent evidence that the selected approach protects human health, meets essential needs and delivers agreed pollution-prevention outcomes.

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

Education should equip architects, engineers, procurement officers, contractors, textile designers, food-sector practitioners and municipal teams to assess material needs, specify durable products and manage materials responsibly.

Training should address product longevity and fiber-release prevention in textiles, and food-safe packaging, hygiene and agricultural plastic management in food systems. Public information should make product characteristics, safe handling and disposal options understandable and accessible. Civil society and communities can support participation and locally informed monitoring.

Research should test how design and procurement choices affect absolute plastic demand, waste and releases. It should distinguish actual measurements from projections and disclose assumptions, service-life effects and possible shifts of environmental burden. These activities should inform national plans and receive appropriate capacity-building support.

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?

SGBF offers functional recommendations rather than an assessment of the current wording. Definitions that determine obligations should be sufficiently clear for consistent implementation; evolving technical methods can be elaborated under an explicit mandate from the Conference of the Parties.

Secretariat functions should facilitate accessible information, compatible reporting, synthesis of implementation experience and connections between support needs and available expertise, under the direction of the Conference of the Parties.

Cross-cluster proposal and technical cooperation

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SGBF proposes linking material-need assessment at the planning stage with procurement requirements, documented material flows and review of pollution-prevention outcomes. The instrument should establish core obligations, essential criteria and institutional mandates. Decisions of the Conference of the Parties could elaborate sectoral guidance and periodically updated methodologies.

The City Index (CI) is being developed as an analytical policy-support approach informed by the Sufficiency Composite Indicator methodology. It is not a city certification, ranking or treaty-compliance mechanism. Plastics-specific use requires further indicators, data and validation. Further work will establish appropriate data boundaries and test how project-level information can inform urban policy decisions.

Sector-specific applications under development

Construction: Assess material need during planning and specification; prevent avoidable packaging and offcuts; support durable, repairable components, safe reuse and traceable renovation and demolition waste. Preserve fire safety, climatic performance and essential housing and infrastructure services.

Textiles: Promote appropriate purchasing, durability, repair and reuse; assess synthetic-fiber releases during manufacture, use and laundering; and improve collection and safe end-of-life management. Material alternatives should be assessed for whole-life impacts, local suitability and affordability, without assuming that fiber substitution alone resolves pollution.

Food systems: Address avoidable plastic use in production, distribution, packaging and food service. Assess agricultural plastics where relevant, improve collection and traceability, and test reusable or reduced-packaging systems where safe and practical. Measures must preserve food safety, shelf life, nutrition and access, and should be evaluated alongside food loss and waste to avoid shifting environmental burdens.

Illustrative applications for pilots

A municipal building project could document the service required, review plastic-intensive specifications and packaging, assess safe and locally suitable options, and record purchased quantities, offcuts, reuse and waste destinations. Documentation and verification practices informed by saaf® could support this process. The pilot should establish a baseline and assess results against comparable service provision and safety requirements.

Parallel pilots could assess durable textile procurement and repair, and food packaging or service systems that reduce avoidable plastic use while maintaining hygiene and controlling

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food loss. Each pilot should establish sector-specific baselines, document local conditions and assess whole-life trade-offs. These are proposed applications for development and testing.

SGBF stands ready to contribute built-environment expertise, professional capacity-building and experience in resource-demand assessment to further technical work.

SGBF invites Member States, United Nations agencies, non-governmental organizations (NGOs) and international non-governmental organizations (INGOs) SGBF invites consideration of a shared implementation question:

Is material demand necessary, equitable and compatible with environmental limits?
Bringing this question into planning and investment can strengthen the connection between global commitments and practical pollution prevention in buildings and communities.

SGBF ask to consider the policy paper *Sufficiency First: Rethinking Urban Efficiency in the Middle East and North Africa*¹ as a contribution to further policy dialogue, research and cooperation on resource sufficiency and pollution prevention.

¹ Al-Fadl, F. S., et al. (2026). [Sufficiency First: Rethinking Urban Efficiency in the Middle East and North Africa](#) [Unpublished manuscript under review]. Saudi Green Building Forum. Referenced for further consideration.