

Stichting The Ocean Cleanup Response to the Chair's Guiding Questions

Explanatory Note:

The Ocean Cleanup is a global non-profit developing and scaling solutions to rid the world's oceans of plastic. For more than a decade, we have combined scientific research and data collection with operational experience to prevent plastic from entering the ocean through rivers and remove existing and legacy plastic pollution from the marine environment.

This submission focuses on the Chair's guiding question on existing and legacy plastic pollution, where our research and operational experience can provide practical, science-based insights on identifying and evaluating accumulation zones and enabling subsequent remediation efforts.

Cluster B - Guiding Question 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?"

Defining and identifying accumulation zones provides a science-driven basis for prioritising remediation and directing resources towards areas where intervention can deliver the greatest environmental and socio-economic benefits.

- Defining accumulation zone: Geographical areas where legacy plastic pollution accumulates and persists independently of the time, day, or season of the year (i.e. hotspots of plastic accumulation). Examples include, but are not limited to:
 - In national jurisdiction: coastlines
 - In areas beyond national jurisdiction: subtropical gyres
- Ensure monitoring efforts complement remediation. For areas beyond national jurisdiction, The Ocean Cleanup has developed the [first-ever global database](#) of large floating plastic observations by smart cameras. They can be used to not only map and quantify oceanic plastic pollution, but also help guide remediation priorities.
- For areas within national jurisdiction it is critical to map and monitor pollution levels in areas including, but not limited to, coastal zones, river banks, and river beds. Consistent mapping and monitoring of these accumulation zones connecting land to sea can not only inform subsequent remediation efforts, but be used to understand the effectiveness of upstream policies aiming at reducing pollution.
- When evaluating locations to address existing and legacy pollution, assessments should consider environmental and socio-economic impacts and risks, including impacts on ecosystems, biodiversity, communities and economic activities. This can help identify accumulation zones where remediation would deliver the greatest overall benefits.
 - For areas beyond national jurisdiction, The Ocean Cleanup has led the development of a (peer reviewed) [impact assessment framework](#), to ensure that these factors are taken into consideration.
- A dedicated remediation fund: to effectively remediate existing and legacy plastic pollution, they need to be removed from the environment to prevent further damaging effects (e.g. due to fragmentation).

Additional Considerations for Addressing Existing and Legacy Plastic Pollution

While preventing future plastic pollution remains essential, millions of tonnes of plastic have already accumulated in the environment. **Nothing done on land today can remove plastic that is already circulating in rivers, coastal waters, and the ocean.** To achieve the objective of ending plastic pollution, the Treaty must address both sides of the plastic pollution equation by:

1. Stopping additional plastic pollution from leaking into the environment (Article 6);
2. Removing the plastic that is already there (Article 8); and
3. Enabling remediation through adequate, predictable and dedicated financial resources, including through a dedicated remediation fund or sub-fund (Articles 8/10)

Prevention and remediation are complementary: upstream and midstream measures can reduce future pollution, but cannot address plastic already accumulated in the environment. **Addressing existing and legacy plastic pollution therefore requires both a clear mandate for remediation, and adequate, predictable and dedicated financial resources to enable its implementation.**

Marine plastic pollution is a transboundary challenge, disproportionately impacting Small Island Developing States (SIDS), coastal and archipelagic states, despite their relatively limited contribution to global plastic pollution. This challenge is particularly acute in areas beyond national jurisdiction, where responsibilities and incentives to finance remediation are fragmented while its environmental benefits extend across borders. The Treaty provides a unique opportunity to establish cooperative mechanisms and financing arrangements that cannot be effectively addressed through national action alone.

Without remediation, **accumulated plastic will continue to fragment into secondary microplastics** for decades, exposing human health through the food chain and threatening marine biodiversity, coastal ecosystems, ocean health and climate. Applying a precautionary approach, action should not be delayed until all scientific uncertainties regarding microplastic impacts have been resolved.

Key takeaways:

- Plastic pollution is an acknowledged threat to marine ecosystems and ocean health.
- Marine plastic pollution is inherently transboundary, disproportionately impacting SIDS, archipelagic and coastal states and requiring international cooperation.
- Sea-based sources warrant particular attention for marine accumulation zones. In the North Pacific Ocean, research estimates that 75–86% of floating plastic mass can be attributed to offshore fishing and aquaculture activities.
 - Abandoned, lost, or otherwise discarded fishing gear (ALDFG) is especially harmful due to negative impacts such as ghost fishing, navigation hazards, and fragmentation into microplastics, reinforcing the need for both prevention and retrieval, including in areas beyond national jurisdiction.
- Reducing future leakage alone will not address existing and legacy plastic pollution. Without remediation, accumulated plastics will persist and continue fragmenting into secondary microplastics, supporting action under a precautionary approach.

Why a remediation fund?

Prevention alone cannot address the millions of tonnes of plastic already accumulated in the environment. Without remediation, this pollution will persist and continue to fragment.

Marine plastic pollution is transboundary, while responsibility and incentives to finance remediation, particularly in areas beyond national jurisdiction, are fragmented.

Dedicated multilateral financing would enable coordinated remediation of this shared challenge, while helping address the disproportionate impacts on SIDS, archipelagic and coastal states.

Recommendations for Articles 6, 8, and 10

1. Prioritise Prevention and Elimination of Marine Leakages (Article 6)

The Treaty should explicitly recognise the unique nature of marine plastic pollution and prioritise the prevention and elimination of leakages into the marine environment.

Recognising that there are multiple leakage pathways with rivers as a major transport for pollution to enter the marine environment— plastics can leak into rivers through storms, flooding, and dumping – it is therefore critical for interception. Once pollution enters the ocean, it becomes a transboundary problem that can damage marine ecosystems (coral reefs, mangroves, seabirds and marine life), the blue economy (tourism, fisheries) and coastal livelihoods.

Preventing leakage from rivers into the marine environment, while removing plastic pollution that has already entered and accumulated in the environment, should therefore remain a priority.

2. Explicitly Define Remediation

Explicitly define remediation to include the removal of existing and legacy plastic pollution, including in areas beyond national jurisdiction, providing legal certainty that remediation encompasses active removal rather than monitoring, assessment or management alone.

3. Support Monitoring and Identification of Accumulation Zones (Article 8)

Monitoring systems should be used to identify and prioritise plastic accumulation zones, ensuring that remediation efforts are directed towards locations where they can achieve the greatest benefits. Identification of zones could take into account the impacts on biodiversity and ecosystem indicators, and social when applicable, in addition to the volume of pollution.

Remediation can also generate monitoring data on pollution levels and flows, helping assess the effectiveness of upstream and midstream measures over time.

4. Establish a Dedicated Remediation (Sub)Fund (Article 8/10)

Special attention should be given to the remediation and removal of existing and legacy plastic pollution through the establishment of a dedicated remediation (sub)fund. Such a fund should support activities within

and beyond national jurisdiction, recognising that marine plastic pollution is transboundary in nature, disproportionately impacts SIDS, archipelagic and coastal nations, and generates environmental benefits that extend beyond the jurisdiction of any single state. Dedicated financing would enable coordinated action where national funding mechanisms are insufficient or absent.

Dedicated financial resources would enable the necessary remediation. This could be operationalised through a dedicated remediation fund or through a clearly designated remediation sub-fund or funding window within the Treaty's dedicated or hybrid financial mechanism. In either case, resources for remediation should be accessible.