



Response from No Plastic In My Sea

to the Chair's guiding questions regarding the second informal in-person meeting of Heads of Delegation to the Intergovernmental Negotiating Committee on Plastic Pollution.

September 2026

Overarching message

No Plastic In My Sea thanks the Chair for the opportunity to submit written views.

Our overarching message is simple: the priority must remain the adoption of legally binding, global obligations covering the full lifecycle of plastics, starting with a reduction of the plastic production. UNEA Resolution 5/14 originally mandated a treaty that ends plastic pollution: we argue that a treaty targeted on waste management and future voluntary national measures would not deliver on that mandate. The treaty must include defined, precise, numbered targets, identify the responsible actors and provide dedicated funding.

About the process of elaboration of the Aid, we regret the exclusion of observers, and in particular civil society, from the debate. Modalities for more inclusive observer participation in future sessions should be agreed upon in Bangkok. We appreciate the opportunity to contribute through the submission of written views and hope that they will be carefully studied and considered.

Cluster A:

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

National action plans and measures, such as reporting, should be aligned with the global objective of reaching the main goals of the treaty, aligned with the initial mandate.

National plans should be implementation tools, not substitutes for global obligations. **The treaty** should establish **what** Parties must achieve, through binding obligations and quantified global targets, including the reduction of plastic production; **national plans** should set out **how** each Party will achieve, and, where possible, exceed those obligations with concrete actions, timelines, responsible actors and indicators.

National plans cannot compensate for vague or non-prescriptive global provisions.

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 a single implementation cycle rather than as separate procedural articles:

- **Reporting** should be mandatory and regular and should cover the full life cycle, including the production, import and export of primary polymers and plastic products, not only waste. Reports should be publicly accessible.
- **Monitoring** of plastic pollution in the environment, including micro- and nanoplastics, is currently missing from the cluster and from the Aid to Negotiations. This omission should be corrected in Bangkok.
- **Implementation and compliance** should be handled by a dedicated mechanism that identifies implementation gaps, distinguishes between lack of capacity and lack of will, and is able to recommend corrective action, including stronger measures where appropriate.
- **Effectiveness evaluation** should assess, on the basis of independent science free from conflicts of interest, whether collective action is sufficient to meet the treaty's targets and trigger stronger measures by the COP if necessary.

All these measures should be aligned with the global objective of meeting the treaty's numbered targets. Without such targets, reporting and evaluation have nothing to measure against.

Cluster B:

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

Independent science must lead the debate.

1.1 Scientific studies demonstrate the link between the high quantity of plastics produced, notably single-use plastics, and plastic pollution.

The discussion should target specifically the most polluting items, including single-use plastics and hidden plastics such as cigarette butts and coatings.

In this respect, single-use plastic bottled water is a strong case: it represents 31% of the single-use plastic produced in the European Union, and 45% when including all bottled beverages (Estimating packaging placed on the market at national level - Packaging model updates version 2.0, Publications Office of the European Union, Luxembourg, 2026).

A strong global measure to reduce the production of single-use plastic bottles, promote refill and reuse systems, and guarantee access to plastic-free drinking water should be adopted.

More broadly based on the recommendations of the Scientists' Coalition, the concept of essentiality should guide the selection of plastic products and chemicals to be banned or restricted/reduced. The essentiality of a product can be evaluated based on criteria such as "essential or not essential for health, safety, or society" and "existence of acceptable alternatives."

1.2 Scientific evidence is also clear regarding the health and environmental risks of plastics, especially on:

- The toxicity of additives, which is determined at the product design stage
- The dispersion of microplastics and nanoplastics, widely used in the fast fashion industry, paints and coatings, tire wear particles, among others.

Global measures should be considered where products or the chemicals they contain pose significant risks to human health or the environment, are likely to leak into the environment, impede safe reuse or non-toxic recycling, or are widely traded across borders.

In addition, common and harmonized global design requirements for plastic products – covering additive content, reusability, recyclability without toxic contamination, and labelling for traceability – are needed to reduce the toxicity of the products globally and avoid fragmented national standards.

A list of bans and restrictions of plastic products and chemicals is necessary.

We also point out that the proposals for annexes on plastic products and chemicals of concern tabled at INC-5.1 in Busan (2025) by Mexico, supported by around 100 countries, could be reinstated in the next draft text and serve as a starting point for discussions between countries.

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?

On that issue, we strongly align with the recommendations of the Scientists' Coalition. Remediation is necessary but can never replace upstream prevention: removing plastics once they are in the environment is extremely costly and often unfeasible, and it is not possible to remove micro- and nanoplastics. Remediation is bound to fail as long as pollution continues to enter the environment.

Enabling factors should include: adequate and dedicated financing based on the polluter-pays principle, including contributions from producers; harmonized monitoring and mapping methodologies to identify accumulation zones, based on both the volume and the chemical composition of the waste; risk-based prioritization of sites that threaten human health, ecosystems and livelihoods; environmental and social safeguards, including independent assessment of large-scale technological clean-up approaches, which can entail significant ecological risks; and the involvement of local communities and Indigenous Peoples. Remediated plastics should not be indiscriminately recycled into new products.

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

This question only makes sense if clear choices are made upstream to eliminate all non-essential plastics. No waste management system can cope with current and projected volumes of plastic production, and waste management must not become the treaty's primary response to plastic pollution.

Cooperation on waste management should therefore follow the waste hierarchy, which should be restored as a guiding principle of the instrument as a whole. Cooperation should include: minimum requirements for environmentally sound management, with flexibility on how to achieve them; a prohibition on open burning and other harmful practices; chemical transparency to protect waste operators; and financial and technical support for developing countries, funded by producers through mandatory, harmonized EPR schemes rather than by public budgets alone.

Cluster C:

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 “polluter pays” principle, through industry contributions, should be enforced with a life cycle approach, including production. EPR schemes could be reinforced and harmonized across national jurisdictions to ensure producers bear the financial and operational responsibility for waste prevention, refill and reuse systems, collection, processing, and remediation.

Financing should be adequate, predictable, and accessible, with priority given to least developed countries and Small Island Developing States. Resources should be mobilized, in particular, through a global fee on primary polymer production and mandatory producer contributions, and should also cover waste prevention, refill and reuse systems, monitoring, compliance, and remediation.

Financing must support the full life cycle, in particular reduction, reuse, and refill systems and safe alternatives, and must not disproportionately finance downstream waste infrastructure.

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?

In addition to the responsibility to pay for the pollution it generates (polluter pays principle), much can be expected from the private sector in developing genuine alternatives to plastic and in scaling up refill, reuse, and deposit-return systems. A substantial share of EPR revenues should be earmarked towards waste prevention, refill and reuse systems, and alternatives to plastic.

Some other sectors could also contribute by developing specific solutions. The tap water sanitization and distribution sector could be a key partner fostering access to safe, plastic-free water.

Expertise on capacity building and technical assistance can draw on the experience of the actors most advanced in plastic reduction (bulk and unpackaged goods retailers, reuse systems operators, deposit-return schemes...), as well as their professional federation.

We share the concerns, voiced by the Scientists' Coalition and other observers, that the Aid to Negotiations' emphasis on private investment must not leave implementation in the hands of vested interests: robust conflict-of-interest safeguards for all treaty bodies are essential.

Cluster D:

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?

Given the current state of emergency, we urge negotiators to respect the original mandate of UNEA Resolution 5/14, addressing all types of pollution (macro-, micro- and nanoplastics, chemicals...) and all impacts on both human health and the environment across the full lifecycle.

The following principles should guide the instrument and be operationalized in its substantive provisions, not merely listed: the precautionary approach; prevention and the waste hierarchy; the polluter-pays principle; the full life-cycle approach; the right to be informed; the protection of human health; intergenerational equity; and a just transition for waste pickers and affected communities.

The waste hierarchy in particular must be restored as a guiding principle of the whole treaty, rather than being confined to a single bracketed reference in the waste management article.

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

Supporting and funding research and public information on the health risks of plastics is crucial to protecting the life and health of future generations, which is a central and global objective of the treaty. Public information should implement the right to know: information on the chemicals contained in plastic products should be accessible to consumers, workers, communities, and researchers, which presupposes upstream disclosure obligations on producers.

Although these measures address a health issue central to the plastic crisis, they cannot be given the same level of priority as plastic reduction targets tackling the problem at the source.

They cannot serve as palliative measures concealing insufficient and unambitious policies. Consumers cannot be asked to change their consumption while the production of non-essential plastics continues to grow unchecked.

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?

Aligning ourselves with the reactions of many civil society representatives and of the Scientists' Coalition, we reiterate our disappointment with the current formulation of the Aid to Negotiations.

On substance, most of the ambitious measures – targeting plastic production and the full lifecycle, defining a list of plastic products and chemicals to be banned or restricted – have been removed or bracketed.

The Aid does not reflect the positions supported by a majority of countries during the INC process.

- **On health**, more than 120 Members supported a CRP at INC-5.2 proposing a dedicated, operational article, building on the Busan Chair's Text (Article 19) and earlier proposals on vulnerable populations, science-based health guidance and a One Health approach. That level of detail was negotiated and endorsed by a clear majority, yet the current text retains only scattered references to "health" without an operative provision.
- Similarly, a text proposal **on "a sustainable production"** was already supported by 103 Members at INC-5.1. We align with the Environmental Investigation Agency's appreciation in calling this situation a "missed opportunity" for the progress of the negotiations.

Key definitions (plastic, plastic pollution, plastic products, microplastics, chemicals...) have been withdrawn, although they determine the very scope of the treaty; **definitions must be science-based** and must not become a means of narrowing the treaty's scope.

The Secretariat's role should be strengthened to include reviewing and synthesising Party reports and identifying implementation gaps, following established practice under other multilateral environmental agreements. Conflict-of-interest safeguards for subsidiary bodies should be reintroduced.

In the process of elaboration of the Aid, we regret the exclusion of observers, and in particular civil society, from the debate. Modalities for observer participation in future sessions should be agreed in Bangkok. We appreciate the opportunity to contribute through the submission of written views and hope that they will be carefully studied and considered.

We also insist on the necessity to break down the barriers between UN processes. For example, the UN water conference at the end of 2026 is an opportunity to develop access to tap water and reduce plastic bottle production.