Submission by the Russian Federation
on issues that were discussed at the INC-2 in Paris, France,

The delegation of the Russian Federation avails itself of this opportunity to highlight the major points of its interventions made during the INC-2 in Paris, including in the contact groups that focused their work on the document UNEP/PP/INC.2/4.

The Russian Federation is of the view that the overall goal of the future international legally binding instrument should be combatting plastic pollution and not plastic production as such, and therefore an emphasis should be put on improving plastic waste management systems rather than interfering with existing production chains. Thus the future agreement should be aimed at creating conditions for perfecting the mechanisms of collecting, sorting, recycling and utilizing of plastic.

It is also our key concern that broad interpretation of the term “full life cycle” of plastic be avoided so as to exclude from its scope the extraction of plastic raw material. It is essential to emphasize that interfering with extractive industries can jeopardize economic sustainability for the majority of the States.

Therefore, it is our position for the entire negotiation process that measures aimed at restricting the extraction of primary raw materials should not be reflected in the future agreement since they are more related to the issues of sustainable development and human rights rather than proper issues of the plastic pollution. The latter is the result of people’s attitude towards consumption of goods, and it can be negative with regards to any type of produced and consumed goods, leading to problems similar to those discussed within the INC process. And that is why the main goal of the agreement should be to increase responsibility rather than to reduce consumption of natural resources. The extraction of natural resources has no direct relation to the issue of plastic pollution.
In this light, we would like to comment again on some of the Potential options for elements towards an internationally legally binding instrument.

**On the Objectives.**

It is our understanding that combating plastic pollution is a country-driven process, and thus the instrument should take into consideration national circumstances and capabilities.

Our delegation believes that reducing plastic pollution is a more tangible goal compared to ending plastic pollution, and therefore in article 9 we would support an edited version of paragraph “a”: “Reduce plastic pollution, protect human health and the environment from its adverse effects throughout the life cycle of plastic, taking into account national legislation, capabilities and other circumstances”.

**On core obligations.**

An important note with regards to all core obligations: the Russian Federation does not support banning or phasing out. In all instances, where such language is used, except for the cases where we do not agree with the entire proposal or sentence, the term “reduction” or “reducing” is preferable.

**Core obligation 1 (phasing out/reducing the supply of, demand for and use of primary plastic polymers).**

In line with our previous general statements, we cannot support establishing global targets to reduce production of plastic raw material in article 10, paragraph “a” (options for target) and therefore would opt for paragraph “a” subparagraph “ii” – “Establish nationally determined commitments or targets”.

With regards to sub-paragraph “b” (options for regulating primary plastic polymers) we are against introducing any moratoriums or bans on primary production of plastic polymers because there are no environmentally safe alternatives to primary plastics comparable in price and functional properties. Primary plastics are widely
used in medicine and other industries. Therefore banning them would result in increased cost of socially important goods, which in turn would jeopardize food security and health sector.

We also do not support applying additional import and export requirements, or licensing schemes, and therefore the only option that our delegation would support is reflected in paragraph “b” subparagraph “iii”, which suggests establishing mechanisms for tracking types and volumes of polymers, precursors, as well as chemicals applied in production.

**Core obligation 2 (banning/ phasing out/ reducing the use of problematic and avoidable plastic products).**

We believe that paragraph “a” of article 11 (monitoring production of raw materials) is unnecessary in the global agreement since it is more appropriate to have such measures on national level.

Paragraph “b”, in our understanding, will be more complete if we add some focus on environmental safety of alternatives to plastic. We therefore propose to amend this paragraph and to state it in the following wording: “Establish criteria to determine and prioritize problematic and avoidable plastic products, including unnecessary or short-lived products, with a focus on evaluation of environmental safety of alternatives during its production, consumption and recycling”.

In paragraph “c”, when talking about reducing or controlling the production, sale, distribution, trade and use of specific problematic and avoidable plastic products, we would add the term “non-recyclable” plastic products (line two) in order to emphasize that the types of plastic products regulated under the proposed article are not only problematic or avoidable, but also non-recyclable.

With regards to the content of paragraphs “d” and “e”, it is equally important to understand what those problematic or avoidable plastics are, before the issue of applying import or export requirements can be discussed.
Core obligation 3 (chemicals and polymers of concern).

Paragraph “a” subparagraph “i” – we would prefer to use the terms “reduce or control” instead of “ban, phase out”.

We do not support the inclusion of subparagraphs “ii” and “iii” (import and export requirements) of paragraph “a” into the zero draft text. We also do not support paragraph “b-ii” (increasing transparency).

With regards to paragraph “b-i” – we propose to move it from the obligations section to the voluntary approaches.

On paragraph “c-i” – a definition of the term “green chemistry” is needed.

Core obligation 4 (reducing microplastics).

For paragraph “a” subparagraphs “i” and “ii” – the terms “reduce” or “control” are preferable instead of “banning or phasing out”.

We do support options set in subparagraphs “i” and “ii” of paragraph “b”, while subparagraph “iii” we propose to be edited in the following way: “Developing guidelines on best available technology and best environmental practices to reduce release of microplastics, including for design, in the washing, textile, tyre, road marking industries, and polymer waste based on standardized approaches for detection of microplastics and their characterization”.

Core obligation 5 (strengthening waste management).

We propose alternative wording for paragraph “a” subparagraph “i”: “Deploy and foster the development of technologies for the collection, recycling and disposal of plastic waste, and to provide for the mechanism for the exchange of technologies”.

Propose to delete paragraph “a” subparagraph “ii”.

Subparagraph “iii” – section “b” (develop guidance for areas such as sampling, analysis, monitoring and verification of plastic waste in the environment…) – good to go.
With regards to paragraph “c” subparagraphs iv-vi – propose to exclude because they duplicate the relevant provisions of the Technical guidelines for the identification and environmentally sound management of plastic wastes and for their disposal of the Basel Convention.

Paragraph “d” subparagraph ‘iii” in our understanding should focus on establishing EPR mechanisms in countries where they do not exist and should take into account national EPR mechanisms in states, which have them.

Paragraph “d” subparagraph “iii” section “a” – propose to delete.

Paragraph “d” subparagraph “vi” – propose to delete because these measures are already covered by the EPR mechanism.

Core obligation 6 (fostering design for circularity).

Paragraph “c” – fine.

Paragraph “e” – propose amended wording: “Set a target for the required minimum recycled content of plastic products on the market, taking into account national requirements”.

Core obligation 7 (encouraging reduce, reuse and repair of plastic products and packaging).

Support paragraph “b-iii” (Recommend that Parties promote reuse through collection of used plastics by production sector).

Core obligation 9 (eliminating the release and emission of plastics to water, soil and air).

Article 18 paragraph “c” talks about prohibiting dangerous practices to prevent the production and releases of toxic emissions from plastic waste management. We need clear definition of what those dangerous practices are.
Section C. Means of implementation.

On financial assistance (article 24).

In terms of financial mechanisms, the Russian Federation supports the mechanism of expanded producer responsibility, public-private partnership, and the creation of special funds.

We note the importance of taking into account country differences in the functioning of existing models of expanded producer responsibility.

Section E. Additional matters.

On cooperation and coordination (article 39).

The Russian Federation supports cooperation in transferring technologies and innovations, as well as the need for joint research projects, including with developing countries.

Technical and scientific cooperation and the exchange of up-to-date data will help to organize effective work on the development and implementation of effective plastic design and recycling technologies.

We also consider it extremely important to take note of the appropriate work under the Basel Convention, which is being successfully carried out, and not duplicate consideration of the similar issues.

Awareness-raising and knowledge sharing are also key elements that need special attention in the future instrument.