Brazil would like to indicate that the specific issue of refilling has been discussed internally, especially in regards to the “design of plastic products”, which is the object of the “chapeau” of proposed Article 5.

Refill packages might actually lead to the increase of use of plastic, if the refill package is a reinforced package. Because paragraph 1 deals very specifically with the “design of plastic products”, Brazil cannot support paragraph 1 (a) at this point, because that refill package might use more plastic material.

In fact, there is a need to discuss if refilling packages that use more plastic material may be considered more sustainable than a refilling package which uses less material. In the long term, a reinforced package using more material might lead to the reduction, in general, of demand of primary plastic polymers. Brazil supports the idea, therefore, that the issue of refilling be discussed in-depth so INC may take the appropriate decisions on this issue.

Brazil is considering Option 2, but expresses its position that minimum design and performance criteria cannot be used as trade barriers. These criteria and labelling and certification procedures are measures that are being considered by the government and therefore, we need to reserve our position on procedures as we are still in the process of defining national measures. As annex C has not yet been developed and there is no definition of the “other elements” to be contained in an annex, Brazil reserves its position on this issue.

Brazil would also request for information on the relevant international organizations mentioned in the provision common for the options in page 11.