1. Scope

**Proposed scope:**

The Global Cement and Concrete Association (GCCA) supports the United Nations Environment Assembly Resolution 5/14 and the overarching objectives to protect human health and the environment from plastics pollution. We support an international agreement that sets ambitious targets and the enabling policy frameworks to end the global plastics waste crisis.

**Explanatory Text:**

Global plastic production and use has quadrupled in the past forty years and is projected to nearly triple again from 2019 levels by 2060, driven by economic and population growth. Despite concerted efforts by policy makers and voluntary commitments to incentivize and accelerate the plastics circular economy, recycling rates for plastics, especially single use plastic packaging, remain low at just 9 percent globally. At such a low recycling rate, the remaining 10 million tons of non-recycled plastic packaging reach the oceans, which is equivalent to 23,000 Boeing 747 airplanes (more than 60 planes per day) landing in the seas and oceans. Ultimately, 7.7 million tons of plastic finds its way into landfills, while another 2.4 million tons are simply discarded, with no treatment, in open-air dumps. To date, investments to scale the collection, sorting and recycling of plastic waste have been insufficient to stem the flow of plastics pollution into our environment.

A recent study estimated 2 billion people lack access to waste management in 2020 and that number is expected to double to 4 billion people by 2040. Global plastic recycling infrastructure is not at the scale and capacity to address the current levels of plastic waste being generated, let alone cope with the expected growth projections in plastic use. It would be unrealistic not to anticipate a transition period for many countries to develop, implement and enforce enabling policies, such as extended producer responsibility (EPR), for brand owners to switch to alternative packaging and to ensure plastic packaging and products are recyclable in practice and not just in theory. Furthermore, significant investments and time will be required to build and scale the infrastructure to collect, sort and recycle plastics, which will need to be underpinned by consumer awareness and engagement.

2. Principles

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1. UNEP (2021): From Pollution to Solution: A global assessment of marine litter and plastic pollution
2. OECD (2022): Plastics use projections to 2060 | Global Plastics Outlook: Policy Scenarios to 2060
4. Pollution Solutions Online (2022); Which Countries Produce the Most Plastic Waste
5. WWF (2019): Brazil is the 4th Country in the World that Generates the Most Plastic Waste
Proposed principles:

The GCCA calls for the Global Plastics Treaty to allow countries to develop their own national plans to accelerate the transition to a circular economy for plastics and which considers co-processing in cement kilns a waste management option.

Explanatory Text:

The GCCA supports the development of a circular economy on the primary basis that it reduces, reuses and recycles waste. The GCCA wishes to highlight the necessity of co-processing unrecyclable plastic waste in cement kilns as a viable waste management option. Co-processing is an established and highly regulated waste management option that is already playing a critical role in preventing plastic pollution entering the environment, diverting it away from unsustainable options like landfilling and incineration and unsafe practices such as open burning. Plastic already in the environment is the subject of ongoing efforts in different geographies. For example, removal from relevant bodies of water like rivers, lakes, shorelines and oceans is underway and the un-recyclable plastic of that waste is being co-processed as the best solution to avoid it again polluting the environment. Co-processing uniquely guarantees that mineral content from waste fuels containing plastics is recycled into high value cement and concrete products.

The average co-processing rate in the EU-27 was 52% in 2020 and there are already several cement plants which operate at 90-95% co-processing rate. In countries that have developed plastics recycling infrastructure, co-processing is only applied to the un-recyclable plastic waste fraction that follows mechanical recycling. This fraction is typically composed of multi-layer, multi-material, single use flexible plastic packaging that has no commercial or practical value to the recycler other than co-processing or for use in less efficient incineration with energy recovery.

3. Additional considerations

Proposed inputs:

The GCCA does not support option 14b(ii) in Options for a Future Plastics Treaty. The GCCA strongly reject the use of the term ‘dangerous practices’ being applied to co-processing.

The GCCA calls on regulation, permitting and compliance procedures (as already implemented in many parts of the world) to ensure implementation of Best Available Techniques when implementing co-processing in the cement industry.

Explanatory Text:

Co-processing represents the final treatment step in a series of integrated waste management processes and procedures that are internationally recognized and regulated. The UNEP report “Turning off the Tap: How the world can end plastic pollution and create a circular economy” published in 2023, looks into the causes of plastic pollution and proposes a system change scenario for the future. The scenario accepts that sub-optimal solutions will need to be applied to prevent those plastics that we cannot eliminate or recycle from becoming pollution. The UNEP report urges governments to assess whether cement kilns may be available for the safe disposal of non-circular plastic and for avoiding plastic pollution.

https://www.unep.org/resources/turning-off-tap-end-plastic-pollution-create-circular-economy
It is the GCCA’s view that only ‘open-burning’ can be viewed as a dangerous practice. As open-burning is fundamentally different from co-processing, it is irresponsible to categorize these opposing actions in a similar reference as they are not comparable means of treating waste. The GCCA calls for the Global Plastic Treaty to bring an immediate end to the non-sustainable and dangerous practice of open burning.

Co-processing can be implemented and operated in a safe manner. Unlike incineration there are no other additional wastes generated as the ashes become part of the cement clinker. Long retention times, high temperatures and low chlorine levels in the kiln are positive differentiators compared with energy to waste incineration in terms of emission to air. Alternative fuels undergo a rigorous acceptance and inspection procedure before being used which additionally controls the emissions to air. Application of Best Available Techniques (BAT) ensure a high level of protection of human health and the environment.

For example, co-processing is widely and safely used across Europe where emissions to air arising from the manufacture of cement are regulated (IED - Directive 2010/75EU) and installations operate in accordance with a corresponding permit. Air emissions are measured according to specified provisions to ensure compliance with the limit values, and these are published on a regular basis.

The Basel Convention, which is led by the United Nations Environmental Programme, published in 2011 the “Technical guidelines on the environmentally sound co-processing of hazardous wastes in cement kilns”8 where the role of co-processing is acknowledged. This acknowledges that co-processing provides an environmental sound management of hazardous wastes, as outlined in the Technical Guidelines UNEP/CHW.10/6/Add/3/Rev.1. That document states:

“Co-processing of wastes in properly controlled cement kilns provides energy and materials recovery while cement is being produced, offering an environmentally sound recovery option for many waste materials. As countries strive for greater self-sufficiency in hazardous waste management, particularly in developing countries that may have little or no waste management infrastructure, properly controlled co-processing can provide a practical, cost-effective and environmentally preferred option to landfill and incineration. In general, co-processing of waste in resource-intensive processes can be an important element in a more sustainable system of managing raw materials and energy.”

Even more, for some chemical substances, e.g., Persistent-Organic-Pollutants (POPs), the Basel Convention Technical Guidelines, which are currently under revision, acknowledge that co-processing in cement kilns provide a technology to destroy and irreversibly transform POPs in wastes, while waste incinerators and landfill are no waste management option for these substances.

Finally, co-processing is included as a standalone operation in the recommendations of the Expert Working Group on the review of the Annex IV of the Basel Convention, which lists all the operations used for the transboundary movement of hazardous waste.

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The Global Cement and Concrete Association (GCCA) is the voice of the global cement and concrete industry. We are a CEO led industry initiative whose member companies account for 80% of global cement production capacity outside of China, as well as some key Chinese manufacturers. With our member companies and affiliate associations across the world, we are committed to building a bright, resilient and sustainable concrete future for our industry and for the world.