Written submissions prior to INC-3 (part b)

Potential areas of intercessional work

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<th>Name of organization (for observers to the committee)</th>
<th>International Council of Beverage Associations (ICBA)</th>
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<td>August 15, 2023</td>
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Input on the potential areas of intercessional work to inform the work of INC-3 (following the lists compiled by the co-facilitators of the two contact groups)

Introductory Comments: The International Council of Beverage Associations (ICBA) is supportive of an ambitious Treaty that covers the whole life cycle of all plastics.

In our view, at the highest level, a successful Treaty will:

- Enable harmonized global policy to achieve our collective goal of ensuring that our packaging never becomes waste.
- Address the full life cycle of plastics.
- Establish a clear, common policy framework for National Action Plans.
- Include legally binding and non-legally binding measures.

The UNEP/PP/INC.2/4 provides a strong foundation, and to facilitate progress towards subsequent INCs, the ICBA supports intercessional work across a number of key areas. We see this work as critical to bringing the requisite stakeholders together to continue the policy work that will help form an ambitious and successful Treaty.

There are already leading global multistakeholder initiatives doing work across many of the priority areas in the Treaty, such as the Ellen MacArthur Foundation, the Consumer Goods Forum and the World Economic Forum Global Plastic Action Partnership. ICBA would like to note that it is crucial that this work informs the intercessional and overall policy work moving forward.
Building on the priorities articulated in Part A of this submission, ICBA recommends the following priority policy areas for intercessional work over the duration of the forthcoming negotiations:

**Circular Design:** The instrument should facilitate mechanisms that support circular design, including using less virgin plastic, the use of recycled content and design for recyclability. These actions, combined with enhanced overall collection and recycling will drive both the supply and demand for recycled materials. Together, this will enable the effective implementation of circular design requirements. While global targets are a worthy goal, the maturity of collection, processing and recycling programs should inform country-specific targets and timelines. To that end, intercessional work in this policy area should focus on:

- Clear and harmonized definitions and criteria.
- Establishing clear and consistent standards around the authorization of the use of recycled plastics on food contact materials (FCM).

**Extended Producer Responsibility:** ICBA supports well-designed EPR policies (recognizing there are a variety of models that may differ according to national context) and the inclusion of collection policy principles in the instrument, recognizing that the model for each jurisdiction will be different, and will be based on a range of factors, including: existing recycling programs and infrastructure, geography, consumer behaviour and presence of informal waste sector. Intercessional work in this critical policy space should focus on:

- Establishing core principles, criteria and a framework for EPR policies that will live within the treaty.
- Establish guidelines that enable Member States to preserve flexibility and respond to regional differences through National Action Plans.
- We encourage UNEP to establish forums to facilitate the exchange of best practices and key learnings from the various EPR models currently in place. Creating opportunities to learn about the different legislative and regulatory requirements, governance structures, and programs, will help enable critical learnings for all stakeholders.

**Targets:** The beverage sector recognizes that role of targets, whether global, or within the National Action Plan, is a critical area for discussion, and supports intercessional work in this space.

Targets and action plans to achieve reductions will need to be informed by local circumstances, and should draw from existing voluntary industry initiatives and guidance, such as the Consumer Goods Forum’s Golden Design Rules, which are aligned to targets laid out in the Ellen MacArthur Foundation’s (EMF) New Plastics Economy Global Commitment.

**Reuse Options:** Our members see reuse as a critical component of transitioning to a circular economy. To support globally coordinated implementation of national reuse policy, we are aligned with the Business Coalition for a Global Plastics Treaty (Business Coalition) that over the duration of the negotiation process intercessional work should focus on:

- Definitions, metrics, and standards for reuse systems and new delivery models.
- Best practices for hygiene, safety, and quality management of reuse and refill systems.
- Incentives and support needed to direct reuse investments from the private sector towards setting up and operating shared infrastructure and reverse logistics.
- Developing standards and metrics around the assessment of the environmental footprint of reuse.