



## The international legally binding instrument on plastic pollution, including in the marine environment

### Written submissions prior to INC-3 (part a)

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As the trade association for the world's airlines, representing some 300 airlines in over 120 countries, IATA welcomes the opportunity to provide a written submission to inform the work of the Intergovernmental Negotiating Committee on Plastic Pollution.

### Elements not discussed at INC-2

#### Scope

##### Proposed scope:

IATA would like to propose that the current scope of the Instrument includes provisions that harmonize national plastic regulations including bans, restrictions and labeling. International aviation is increasingly facing the challenge of differing plastic rules at either ends of a flight, causing compliance, logistical and financial concerns. In addition, the Instrument should recognize that certain plastic products in aviation are mandated by civil aviation and public health authorities, for security, safety and hygiene purposes.

##### Explanatory Text:

*The inappropriate disposal of single-use plastics (SUP) and its impact on the marine environment is a key challenge for our society. Airlines are keen to replace SUP products with sustainable alternatives but are increasingly facing challenges regarding unharmonized restrictions, that do not take transport-related emissions nor aviation's strict security and safety controls into account. It is assumed that other international sectors face similar challenges, with the lack of harmonization presenting significant trade, compliance, logistical and financial concerns. International transport (aviation and*

*maritime) often faces the acute problem of differing SUP restrictions at either end of a journey, therefore a harmonized approach when defining obligations and implementation measures.*

## **Additional considerations**

### **Proposed inputs:**

Taking into consideration the specific challenges for the aviation sector, the Instrument should consider:

1. Consistent definitions related to plastic related terminology
2. Consistent restrictions related to product types and characteristics
3. Compatibility with civil aviation security and public health concerns
4. Clear guidance on sustainable alternatives (*LCA – transport (displaced pollution)*)

### **Explanatory Text:**

*It is recognized that potential core obligations, control measures and voluntary approaches need to take into consideration that the use of plastic, especially for the air transport industry, has a transboundary aspect. Therefore, any implementation measure (such as national action plans and reporting) needs to be consistent in terms of definitions and metrics and ensure the adoption of harmonized replacement strategies, considering requirements mandated by civil aviation authorities and public health authorities.*

*It is important that clear definitions are included in the future Instrument, expanding the Glossary of key terms (UNEP/PP/INC.1/6). Currently, there appears to be no agreed definitions for the terms: single-use plastics nor for SUP replacement options of bioplastic, bio-based, biodegradable, and compostable products. Noting that “safe, sustainable alternatives and substitutes” are being considered as a possible core obligation.*

*Currently there is no global consistency in single-use plastic restrictions that are being imposed by regulations. As the airline industry needs to follow strict safety and hygiene requirements, it is important that any proposed mechanism takes into consideration the specific challenges of the sector. Not considering a transboundary aspect will accelerate the introduction of asymmetric national regulations, resulting in the need to introduce differing alternative products on separate legs of a journey, increasing compliance difficulties, and generating more plastic waste.*

*In addition, the air transport sector has to comply with specific cabin waste regulations that preclude the reuse and recycling of inflight materials and also minimize the potential for SUP products from cabin waste ending up in the marine environment. Cabin waste is subject to national regulations that ensure it is handled, stored and disposed appropriately with many countries introducing specific regulations on cabin waste from international flights based on agricultural concerns.*

*Furthermore, it is important that alternative sustainable materials for the replacement of problematic plastics, especially for aviation, takes into account the products' environmental characteristics, affordability, hygiene, food safety, weight and space it takes up on board and options for end-of-life processing, enhanced recycling systems and biotreatment options; and, risk-based international catering waste (ICW) regulations. It is proposed that the Instrument adopts a standard lifecycle assessment (LCA) methodology that includes transport-related emissions, hence, ensuring that alternative products do not inadvertently result in higher environmental impact, displacing pollution from the marine environment to the atmosphere.*

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