Article 11.
Russia believes that in this article we should pay attention to the legacy pollution and to the need to provide the transfer of technologies and practical solutions for elimination of legacy pollution.

Article 12
We think that subparagraph g of paragraph 1 must be considered as recommendation. The procedure for spending the fees collected under the EPR is determined by countries on their own taking into account existing needs and capacities.

Article 13
We propose to delete the provisions on the disclosure of harmonized information on the chemical composition of all plastics and plastics products throughout their life cycle, as well as the submission of this information to the Secretariat. We consider these provisions as premature.