Part II.

Article 2. Chemicals and polymers of concern.

The general position of the Russian Federation is that substances of concern, posing threat to environment and human health, shall not be part of the future Instrument, because they are already regulated by the BRS Conventions.

The criteria for identifying chemicals of concern, as well as the list of such chemicals are established by the Stockholm Convention on Persistent Organic Pollutants.

The Russian Federation does not support establishing any alternative mechanisms on chemicals under the future Instrument. Therefore we support the “zero option” – dropping that article from the text.


The Russian Federation does not support any of the options listed in article 3-a, for the following reasons.

Growing attention to individual needs of every person, including issues of hygiene, as well as general increase in the level of life inevitably leads to growth and development of the market of single-use plastic products and single-use plastic packaging.

At the same time, dealing with waste generated as a result of the use of those plastic products requires introduction and development of new technologies to ensure the maximum level of recycling of plastic and other single-use products.

It is our view that a plastic product becomes problematic only when there is no system of collection and utilization. Based on that, each country will have its own list of problematic plastic products, depending on national circumstances.

In this regard, the possibility of identification of such products, as well establishing limitations on their use shall be done at the national level.

This section of the document can contain provisions aimed at establishing circular economy. This also implies maximum involvement of disposable products into secondary circulation.

To create a circular economy system it is important to reduce generation of waste through implementation of recyclable solutions and introduction of circular single-use solutions.

Article 3-b. Intentionally added microplastics.

The categories of intentionally added microplastics and primary microplastics require careful definitions. Microparticles can be properly defined as particles with sizes ranging from units to hundreds of microns.

Therefore, we consider it necessary to establish corresponding definitions in this document. At the same time, plastic particles with a size of less than 5 mm, including the nanometer range, are commonly referred to as microplastics.

With this in mind, our delegation would propose to specify in this section that Parties should take effective measures to identify goods and products that contain intentionally added microplastics, to establish the risks of their ingestion and their pollution of the environment and adverse effects on
the human body, followed by a phased reduction in their use when the risks have not been eliminated and safer and more affordable alternatives are available, as well as to facilitate the transition to these alternatives and accessibility of these alternatives.

**Article 4. Exemptions.**
Given our delegation’s proposals on articles 3-a and 3-b, we would prefer this section to be dropped.