a. **Product design and performance**

Regarding the reduction in paragraph a of the 1st paragraph is to make a preliminary assessment of how the reduction in question will affect access to the resources we need and share it with the relevant parties.

Regarding the provision in clause c of the 1st paragraph, we submit for your opinion the conduct of sectoral studies and the evaluation of incentive mechanisms for emission reduction.

There is a risk that countries that cannot comply with the provisions in the statement in the first paragraph of Option 1 will become externally dependent. In this context, the criteria specified as design and performance criteria should be clearly defined in advance. Design and performance criteria are considered to be industry dependent.

Regarding the provision in the 2nd paragraph of Option 1, it is necessary to check the traceability of the product and focus on the possibility of creating an application such as a digital passport application.

Our view on provision a of the 1st paragraph of Option 2 can be summarized as follows: Due to the wide range of products and possible differences in R&D infrastructure, this option seems more appropriate as it is important to countries allow more flexibility regarding design performance and different procedures.

The certification processes in Article 3 of Option 2 and the qualifications of the institutions/organizations that will carry out the processes should be clearly shared. In addition, it should be taken into consideration that countries should cover the certification costs and publish a regulation detailing which party will be responsible.

Paragraph 4 of the title states that the parties will be encouraged to work with international organizations in the process of determining standards regarding product design, content and performance. Considering that the design rules in question will bring new certification rules, it is deemed beneficial to require the standards to be determined with a stronger provision, rather than encouraging them to be based on international standards, in order to avoid unnecessary costs and administrative burdens in the conformity assessment processes. **Regarding the subject, we would like to state that we find it useful to add a statement like.“Standards and guidelines shall be developed in cooperation with relevant international organizations in order to ensure unity at the multilateral level….”**

Regarding product design, considering the similar design criteria would apply across the countries, a global commitment is important for determined transformation of the sector while preserving its competitiveness. Also, sectoral analysis should be endorsed.

However, option 2 is considered to be more suitable in order for the transformation in question to include realistic commitments.

b. **Reduce, reuse, refill and repair of plastics and plastic products**

Developing and increasing the capacity of collection and recycling infrastructures for the production of high-quality secondary raw materials, developing the infrastructure for the use of recycling technologies, using more recycled and/or more alternative raw materials
and less unprocessed inputs in manufactured products are important approaches. In order to achieve this, increasing the use of secondary raw materials is critical. It is important to ensure the necessary quality and standards for the re-use of plastic waste as secondary raw material in plastic production. At this point, collecting plastics separately at the source without being contaminated with other wastes facilitates the recycling processes, and their use as secondary raw materials becomes environmentally and economically suitable. In this context, closed-loop collection systems stand out and, as stated in the Draft Text, it is recommended that the deposit return system be evaluated among exemplary applications.

In addition, it is important to link sector-based evaluation and sectoral gradual transition targets to a timetable on issues such as reduction, reuse, etc. specified in the article. Because the levels of importance regarding the production of plastics and their participation in product production are very different. Reuse of plastics will not be at the same level of importance in the automotive and food sectors.

The preferred option is the second by the Turkish Delegation since it would be more appropriate to allow more time for the development of guidelines as per the second paragraph, countries will take time-bound actions.

c. Use of recycled plastic contents

When the use of recycled plastic contents section in Zero Draft is examined, it is seen that it is recommended to set national-scale targets for the use of recycled plastic contents. In order to achieve the determined targets, it is important to provide clean raw material input to the system and it is recommended that the Parties establish separate collection systems at the source.

In this regard, the deposit return system is one of the most effective methods as it is managed in a closed loop. However, it is recommended that the parties be given the opportunity to evaluate their existing facilities and waste management infrastructures and be directed to at least a dual collection system. It is also thought that it is important to determine the requirements for how to measure the recycled plastic usage rate and to evaluate the creation of the necessary infrastructure for this measurement.

The reaction we received from those who operate on behalf of recycling during the consultation process we held in our country was that the role of the recycling sector in controlling plastic pollution is not defined as thoroughly as plastic producers. In this context, we would like to request a definition of the sector in question.

Also see Section III of ANNEX C. The minimum percentages of recycled plastic content in the section will vary depending on the sector and the intended use of each plastic material used in the final product. Here, we believe that it would be beneficial to determine the criteria for the minimum % value by taking into account the final performance requirements of the product.

If an international regulation regarding the minimum recycled content obligation is introduced, it is considered important that it be based on international standards in order to prevent the formation of technical obstacles.

After the evaluation we requested in Annex C, we would like to revisit the issue, but for now, our preference as the Turkish delegation is Option 2, as it allows country-oriented policy development processes and is suitable for facilitating the transition to new conditions for the sectors that will be directly and indirectly affected within the scope of this document.
Because the decisions taken have the potential to result in the elimination of some types of employment in the relevant sectors, and this issue finds its equivalent in the expression “just transition”.

d. Alternative plastics and plastic products

Regarding non-plastic substitutes, national costs that will arise for R&D and production activities of non-plastic materials designed as a substitute for plastic materials should be taken into consideration. These increases must be carried out without harming competitiveness in international markets.

In the provision in the 1st paragraph, it should be clarified which material class is targeted, the problem of access to these materials (cost, transportation, customs, etc.) should be resolved, and it should be clearly regulated what the acceptance criteria will be in accordance with the current legislation of the countries, which already reflect their international obligations, regarding the definition of the potential expression.

In the 2nd paragraph, it is thought that analysing the substance content on a sectoral basis will contribute positively to the process of developing plastic reduction targets. For example, in the automotive industry, the tendency to use plastic composites instead of metal is increasing in order to obtain lighter products. On the other hand, universities, private sector, etc. It is important to encourage the development of multi-stakeholder collaborations.