a. Product Design and Performance

As for paragraph 1, a preliminary assessment will be needed on how the reduction on primary plastic polymers, plastics and plastic products will affect the access to the resources.

For paragraph 1 (c) sectoral studies and the evaluation of incentive mechanisms for emission reduction should be conducted.

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. Furthermore, design and performance criteria are considered to be industry dependent.

Regarding Option 1, paragraph 2, traceability of the product should be provided and the possibility of creating an application such as a digital passport application should be focused.

Due to the wide range of products and possible differences in R&D infrastructure, option 2, paragraph 1 seems more appropriate as it is flexible regarding design performance and different procedures.

In Option 2, paragraph 3, the certification procedures and the qualifications of the institutions/organizations that will carry out the certification processes should be clearly defined. In addition, it should be taken into consideration that countries will bear the certification costs.

Paragraph 4 indicates that the parties will be encouraged to work with international organizations in the process of determining standards regarding product design, content and performance. Considering 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 which mreads as “Standards and guidelines shall be developed in cooperation with relevant international organizations in order to ensure unity at the multilateral level….”.

Considering that similar product design legislation will be harmonized across the countries, turning this issue into a global commitment is important for the determined transformation of the sector while preserving its competitiveness. Option 2 of the product design and performance is considered more suitable in order for the transformation in question which includes more realistic commitments.

b. Reduce, Reuse, Refill, and Repair of Plastics and Plastic Products

Developing and increasing the capacity of collection and recycling infrastructures to produce high-quality secondary raw materials, developing infrastructure for the use of recycling technologies, and using more recycled and/or alternative raw materials and fewer unprocessed inputs in manufactured products are important approaches. Increasing the use of secondary raw materials is critical for achieving this.
It is important to ensure the necessary quality and standards for the reuse of plastic waste as secondary raw material in plastic production. Collecting plastics separately at the source without contamination with other wastes facilitates recycling processes, making their use as secondary raw materials environmentally and economically suitable. In this context, closed-loop collection systems stand out, and as stated in the Draft Text, it is recommended to evaluate the deposit return system 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. Levels of importance regarding the production of plastics and their participation in product production vary, and therefore, reuse of plastics will not be at the same level of importance in the automotive and food sectors.

The preferred option is the second, as it allows more time for the development of guidelines. According to the second paragraph, countries will take time-bound actions.

c. Use of Recycled Plastic Contents

Examining the use of recycled plastic contents section in the Zero Draft, it is recommended to set national-scale targets for the use of recycled plastic contents. To achieve these 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, managed in a closed loop. However, it is recommended that 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 to be important to determine the requirements for measuring the recycled plastic usage rate and to evaluate the creation of the necessary infrastructure for this measurement.

The reaction received from those operating on behalf of recycling during the consultation process in our country was that the role of the recycling sector in controlling plastic pollution is not defined as thoroughly as that of plastic producers. In this context, a definition of the sector in question is requested. 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, it is believed to be beneficial to determine the criteria for the minimum % value, 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 to prevent the formation of technical obstacles. After the evaluation requested in Annex C, a revisit to the issue is requested. For now, the preference of the Turkish delegation is Option 2, as it allows for 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. 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 arising 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 first paragraph, it should be clarified which material class is targeted, and the problem of access to these materials (cost, transportation, customs, etc.) should be resolved. It should also 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 second 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 to obtain lighter products. On the other hand, universities, the private sector, etc., it is important to encourage the development of multi-stakeholder collaborations.