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Global Alliance for Incinerator Alternatives and Massey University input on the First Draft of the Ministerial Declaration - 2019 UN Environment Assembly

The Ministerial Declaration of the fourth UN Environment Assembly will give the political impetus for government action on urgent environmental crises plaguing our planet and communities over the next two years. Given its importance, the Global Alliance for Incinerator Alternatives and Massey University make the following recommendations to ensure that the Declaration incites governments to take corrective action, and not action that could deepen the environmental challenges we face.

- Plastic pollution: beyond single-use plastics

The plastic pollution crisis, including in marine environments, goes well beyond the impacts of single-use plastics. It includes the blight of micro and nanoplastic pollution, as recognized by the Ad Hoc Open-Ended Expert Group on Marine Litter and Microplastics mandated by UNEA during its meetings in 2018. Indeed, the main sources of microplastic pollution are unrelated to single-use plastics; rather, they come from tire and thermoplastic road marking paint erosion, synthetic microfibers, and pellet loss from plastic production plants.

Likewise, the human health and environmental impacts of plastics throughout their life cycle (including production), as well as of reusable plastics, are well-established. This includes the environmental and human health harms caused by the use of hazardous chemical additives, including endocrine-disrupting chemicals and carcinogens, as already recognized by international bodies for plastics associated with e-waste.

The current version of paragraph 4(i) unfortunately narrows the plastic pollution issue to single-use plastics and associated waste management. Bans on single-use

plastics are effective and immediately-implementable policy options, however the wording in paragraph 4(i) is much weaker than what many states and local authorities are already implementing. The current phrasing also begs the question of what constitutes unproblematic single-use plastic use, given the weight of the evidence of severe environmental harms across ecosystems, as well as harm to human health due to toxic additives and the relationship between plastics and persistent organic pollutants (POPs).

Bans on single-use plastics do not address the urgent and critical issue of micro and nanoplastic pollution from shedding, environmental degradation or erosion of multiple-use plastic items (including textiles, tyres and road markings), as well as the leaching of toxic additives from multiple-use plastics.

Regarding the last part of paragraph 4(i), the term "eco-friendly" is a marketing term of no policy-making or scientific value. The term has lost credibility after being repeatedly deployed to mislead consumers who genuinely care about the environmental impact of their consumer decisions. In addition, the affordability of consumer products in general is of no particular value to the environment and UNEA's mission; rather, it has been recognized that low prices exacerbate unsustainable production and consumption.

On this basis, we propose the following changes:

4(i) *We will decisively address* the damage to our ecosystems and human health caused by **the production, consumption, and disposal of plastics and the use of hazardous chemical additives in plastics**, including by phasing-out most problematic single-use plastic products as early as 2025, **phasing out toxic plastic products and toxic additives, and reducing the use of plastics that contribute to micro and nano-plastic pollution**; and we ***strongly encourage*** the private sector to **develop non-hazardous, reusable alternatives with minimal virgin plastic content, and adopt circular delivery systems geared towards reusability and away from single-use products and packaging** ~~find affordable and eco-friendly alternatives~~;

- Safe, sustainable and just resource, chemicals and waste management in a circular economy

The current draft of the Declaration includes the important theme of a circular economy. A circular economy requires the highest possible preservation of materials, to enable reuse or re-manufacturing; this differentiates it from the linear economy based on extraction. In this way, a circular economy enables reduced virgin resource use, and reduction deserves a clearer emphasis in the text.

Environmental and health concerns associated with chemicals (detailed above) interfere with the circular economy, including the ability to recycle and reuse materials due to chemical contamination. For this reason, we believe the Declaration should explicitly refer to safe chemicals management from extraction to legacy pollution.

While the Declaration covers some waste prevention and management processes that belong to the upper-tier of the waste-management hierarchy, we believe that an explicit mention to the composting or anaerobic digestion of organic and food waste is particularly important, given its relevance for developing countries where it forms a large portion of municipal solid waste, and its relevance for regenerative agricultural practices and sustainable food production.

In contrast, waste incineration constitutes a leakage from the circular economy as recognized by the Ellen Macarthur Foundation in its report [Towards the Circular Economy](#) (page 8), and generates additional persistent organic pollutants, particularly through the incineration of some categories of plastics. This is even the case for "state of the art" incinerators, as shown by the Zero Waste Europe study [Hidden Emissions: A Story from the Netherlands](#). Concerns related to waste incineration arise from stack emissions but also toxic ash and other residues, as demonstrated in the IPEN report [After incineration: the toxic ash problem](#).

In addition, developing countries and marginalised communities within the Global North disproportionately endure the consequences of environmental degradation; for this reason, we believe that they should be priority recipients of financing opportunities, partnerships and investments.

On this basis, we propose the following changes:

4(a) *We will improve* national resource management strategies with an integrated

life-cycle approach to **minimalize virgin resource use**, protect human health and the environment from harmful effects of chemicals and waste, and achieve a resource-efficient and circular economy. **This will include strategies targeting the harmful effects of chemicals from resource extraction, production, consumption, disposal, as well as legacy pollutants (including plastics and all associated toxicants);**

4(b) We *will foster* opportunities for the innovative substitution of hazardous substances in material cycles **including extraction, production, consumption, recycling, and disposal**, with the aim of achieving safe and non-toxic **circular material flows. This includes synthetic endocrine disruptors and persistent organic pollutants introduced in the production and the recycling of plastics, and emitted by waste incineration;**

4(e) We *will share* knowledge on policies, practices, and the best available techniques for the sustainable management **and reduced exploitation** of metal and mineral resources and we *will enhance* national policies;

4(h) We *will work* towards defining appropriate and ambitious national targets for reducing waste generation, increasing the reuse of products, and recycling of waste, **including the composting or anaerobic digestion of organic waste, in socially inclusive ways** by 2025, and **pursue zero waste systems in cities and communities;**

4(n) We *will accelerate* sustainable and innovative financing opportunities and solutions **for developing countries and the financially marginalised communities of the Global North**, and we *will build* innovative partnerships to unlock new capital for sustainable **and socially just** investments;

- Right to information and extended producer responsibility in a circular economy

The preservation of materials within a circular economy is tied to producer responsibility for products beyond the consumer stage. Extended producer responsibility enables producers to design products to prevent pollution and reduce resource and energy use in each stage of the product life cycle. EPR systems finance the cycling of products and materials within the circular economy while preserving their quality, and create green jobs through safe and socially inclusive

reuse and recycling.

At the same time, consumers and communities must be granted access to information about the nature of materials and additives in the products they consume, as well as to the environmental and social footprint of these products. While the Aarhus and Escazu Conventions establish a specific public right to information on pollutants as well as a right to meaningfully participate in environmental decisions, giving consumers and communities information on the broader environmental and social impact of products will allow them to fully play their role in climate change mitigation, and in the transition towards a circular and socially just economy.

On this basis, we propose the following changes:

4(j) *We will support* the efforts to develop global products sustainability and circularity criteria by 2025 and we *agree* to set ambitious national targets on the use of sustainable public procurements to stimulate demand for environmentally sound **and non-toxic** products, processes and services. **Will also support extended producer responsibility policies to both foster product redesign and to ensure the safe reuse, recycling, or composting of products while retaining materials in the economy as long as possible, at their highest possible quality;**

4(k) *We request encourage* the disclosure of product information to consumers and communities, **including the nature of materials and chemical additives, the ratio of recycled content, carbon footprint (including biogenic carbon) and carbon miles, the water and energy footprints, and the fairness of labour practices**, and we *will promote* the development of solutions, with special emphasis on digital solutions, to increase transparency **and to shorten** ~~in~~ production chains;

- Food, livelihoods, agriculture and environment

Food systems are a critical link between human health, livelihoods, and the environment. In particular, regenerative agriculture and agroecology has the potential to generate sustainable yields of food for human consumption, while preserving biodiversity and providing carbon sinks. It works on a small scale compatible with resilient, decentralized food systems that ensure food security allow for socially just land distribution respectful of local and indigenous communities.

The recent and authoritative [Food in the Anthropocene: the EAT–Lancet Commission on healthy diets from sustainable food systems](#) study demonstrates that agroecology has the potential to simultaneously support the attainment of SDGs and the Paris Agreement, particularly when geared to support mostly plant-based diets.

On this basis, we propose the following changes:

4(c) We *will promote* **regenerative and healthy** food systems **and** ~~by implementing sustainable~~ **including socially just and agroecological** agricultural practices, improving value generation and addressing food security **and sovereignty**, environmental health and human **and non-human** well-being in an integrated **and holistic** manner;

4(d) We *will implement* sustainable **and just** land and soil management measures, including afforestation, wetland and landscape restoration, to combat desertification, deforestation, soil pollution, biodiversity loss and to improve climate change mitigation and adaptation, **and food security**;

- Comprehensive data

States and experts alike have recognized the lack of comprehensive data as a critical barrier to effective national, regional and global action to confront environmental degradation. Concerning plastic pollution in particular, this view was the consensus within the Ad Hoc Open-Ended Expert Group on Marine Litter and Microplastics. If Ministers of the Environment are indeed committed to take decisive action to confront today's environmental emergencies, they must commit to comprehensive and standardized monitoring, with integration at the regional and global levels to allow multilateral action.

On this basis, we propose the following changes:

4(g) We *will improve* environmental monitoring systems, including air and water quality, deforestation, **land, air, freshwater and marine pollution from solid, mineral, chemical, and biological wastes, including** marine litter, **micro- and nanoplastics**, and environmental security, and we *support* the development **and integration** of national, **regional, and global** environmental data management capacities; we *will also promote* the use of data analysis models to support

evidence-based decision making at all levels and work towards ensuring transparency of and open access to environmental data;

We thank the Mr Siim Kiisler, the Minister of Environment of Estonia and the President of the fourth session of the United Nations Environment Assembly, his Special Envoy, Mr Ado Lõhmus and the UN Environment Secretariat for considering this submission and specific recommendations, in hope that the 2019 UN Environment Assembly will spark decisive government action to tackle the urgent environmental crises that imperil our planet and communities.