

The World Plastics Council Comments to UNEA Bureau Request for Comments on the Zero Draft Ministerial Declaration

The World Plastics Council appreciates the opportunity to comment on the zero draft of the Ministerial declaration for the fourth session of the UN Environment Assembly.

Under Main priority 2, we have comments on paragraphs 'g' and 'j'.

g) This paragraph should be amended to read as follows.

"We develop strategies to achieve 100% circularity of plastic packaging by 2040 through the use of best available technologies such as, but not limited to mechanical recycling, pyrolysis, gasification, and energy-recovery."

The plastics industry has adopted a goal to achieve 100% recycling, recovery, or reuse of plastic packaging in North America and Europe by 2040. Achieving such a goal will require product re-design and significant investments in recycling and recovery technology.

j) This paragraph should be deleted.

The recommendation is problematic for several reasons.

First, it is in direct conflict with paragraph a, which seeks to utilize life-cycle perspective to achieve a resource-efficient and circular economy. Plastics, including single-use plastics, are among the most resource-efficient materials.

Second, it prejudices the outcome of the UNEA-3 resolution-initiated Ad Hoc Open-Ended Expert Group (AHOEEG) process. The AHOEEG has neither concluded nor made a recommendation to UNEA-4 to phase out single-use plastics.

Third, the recommendation stands in opposition to the UNEA-3 statement that noted waste management was the highest priority to address marine debris.

Fourth, it does not consider the impact of alternatives. Studies by TruCost¹ and Franklin and Associates² have looked into alternatives and found them to be more harmful than plastics.

¹ <https://plastics.americanchemistry.com/Study-from-Trucost-Finds-Plastics-Reduce-Environmental-Costs/>

² <https://plastics.americanchemistry.com/Reports-and-Publications/LCA-of-Plastic-Packaging-Compared-to-Substitutes.pdf>

Fifth, Stemming the Tide³ and The Next Wave⁴ both found that the entire waste stream and not just one item like single-use plastics or plastic bottles needs to be addressed. There is a need to pull value from the full stream in order to finance collection of everything and processing/disposal of low value items in an environmentally sustainable manner.

Given the direct conflict of this sub-paragraph with the goals of sustainable consumption and production, the use of life-cycle assessment, and the need to reduce food waste, we recommend deleting paragraph 'j'.

³ <https://oceanconservancy.org/trash-free-seas/take-deep-dive/stemming-the-tide/>

⁴ <https://oceanconservancy.org/wp-content/uploads/2017/05/the-next-wave.pdf>