U.S. Comments on the AHEG Technical Briefing on Case Studies

The United States thanks the Secretariat and consultants for preparing the "Background information on the analysis of effectiveness of response options including pilots" and for hosting the related technical briefing on 12 August. We appreciate the significant effort to develop a methodology that may be useful in analyzing the effectiveness of various response options to address marine plastic litter and microplastics. We are also pleased to see that the methodology reflects an analysis that aims to evaluate effectiveness in terms of how each response meets its intended goals and is not a comparison among response options with different goals.

We appreciate the opportunity to submit feedback on the revised methodology and offer suggestions for improvement:

1. **Policy Neutral:** The United States suggests the instances of policy-prescriptive language recommending or directing certain actions (e.g. should) in the document be reformulated to neutral language that presents policy options (e.g. could).

2. **Hierarchy/Scope:** The United States suggests removing the proposed policy hierarchy displayed in Figure 2. While government level is one way to categorize response, Figure 2 incorrectly implies that global management strategies are needed to drive action at the regional and national levels. We are concerned that the assumptions underlying Figure 2 do not recognize that regional organizations and countries may choose to take action at any or all of these levels independently. For example, most countries that have achieved environmentally sound management of waste did so through nationally-led action, and implementation often occurs at a sub-national level.

3. **Comprehension/Assumptions:** We suggest articulating the assumptions that underpin the methodology and explaining the methodology more clearly. Many assumptions behind the methodology, rationale for an approach, and resulting conclusions are not explained. For example, in the Bowtie analysis, it seems the method assumes that the undesirable event (plastic leakage into the environment) occurs at the same rate regardless of country-specific circumstances, which it does not. While such assumptions may be necessary, it would be helpful to understand why and how they are applied. The methodology should also explain the relationship between the stocktaking activities, the response options submissions, and how they will be categorized as archetypes and then incorporated into the analysis.

4. **Terminology:** We suggest clarifying the terminology and using it consistently; it would also be helpful to provide a glossary for quick reference. The methodology should also define the criteria used to determine the indicators and the controls for the Bowtie analysis, as well as how each indicator is measured (e.g., low to high, 1-20, Yes/No). The description of the methodology is complicated by terms that are used seemingly inconsistently and interchangeably throughout the document, such as "archetypes," "management strategies," "response options," and "scale." These terms should be defined clearly and used consistently, and as appropriate, the number of similar terms should be reduced.

5. **Analysis/Visualization:** We suggest that Table 10 include additional indicators that more directly link to "effectiveness" and capture the diversity of response options. The matrix could provide additional indicators and descriptors so the reader can understand when a given response option is most applicable. The indicators, as presented, are insufficient in fully describing the breadth of response options and in evaluating effectiveness in meeting intended goals. The indicators should be clearly defined, as well as the metrics used to assess each indicator (low-high, 1-20, Yes/No). For more information on our proposed matrix and definitions of additional indicators, see Annex 1.

6. **Archetypes of Management Strategies:** We propose a selection of archetypes at all governance levels to replace those previously proposed at the global, regional, and national levels (see Annex 2). The activities submitted or identified in the stocktaking exercise should be used to help identify archetypes. The United States urges the selection of pilot studies of archetypes that represent specific management strategies (e.g. regional action plans) and not cross-cutting issues (e.g. microplastics). The methodology and analysis should clearly articulate how the stocktaking exercise fed into the development of the methodology of effectiveness and was used as data for the analysis.

Expectations for AHEG Methodology

The United States expects the AHEG will produce a document on the analysis of effectiveness that displays information for each management strategy in the manner of Table 10, with additional context and indicators, as well as a cover note summarizing the methodology.

Annex I. Proposed Matrix and Indicators

	Descriptive Categories						Analytical Categories								
Archetypes	**Type of Action**	**Scope**	**Life-cycle Phase**	**Geographic Range**	**Env. Zone**	**Prescriptive/ Voluntary**	**Scale**	**Cost**	**Maturity**	**Feasibility**	**Applicability**	**Impact**	**Time Frame**	**Enabling Conditions**	**Comments**
Example: Debris Removal /Capture	Technology and Processes	National	Downstream: Waste mgmt	Coastal zone mgmt	Coast	Voluntary	Small - med.	Low	High	High	High	Low	Short		
Example: Solid Waste Management - Disposal	Legislation, Standards, Rules	National	Downstream: Waste mgmt	Land	Inland	Prescriptive	High	High	High	Med. - high	High	High	Several years	Financing, technical capacity, stakeholder engagement	
Example: Regional Action Plan	Working with People	Regional											Short		

Organizing the Data from the Stocktaking Exercise

The information collected from the stocktaking exercise can be organized using the categories of action from the stocktaking survey (Legislation, Standards, Rules; Working with People; Technology and Processes; Monitoring and Analysis) and then further organized by descriptive categories (below).

Descriptive Categories – These elements describe each activity based on the following categories: Scope, Life-Cycle Phase, Geographic Range, Environmental Zone, and Prescriptive/ Voluntary. These descriptive elements could be used as filters for the actor to search for specific types of activities.

> **Scope** – describes if the activity is focused on the global, regional, or national level.
>
> **Life Cycle Phase** – describes the life-cycle stage of the activity as either upstream (manufacturing, distribution/usage) or downstream (post-distribution activities or usage such as waste management, including collection, sorting/recycling/energy recovery, and disposal).
>
> **Geographic Range –** describes the geographic area addressed by the activity (e.g., source-to-sea, river basin management, coastal zone management).
>
> **Environmental Zone –** describes where the activity is being implemented (e.g. inland, coast, freshwater, or marine).
>
> **Prescriptive/Voluntary –** describes if the activity is voluntary or prescriptive (e.g. regulatory, legislative, or policy).

Analysis of the Data

Analytical Categories – These categories describe the effectiveness of each response option or activity based on the indicator listed under each column (e.g., scale, cost, maturity, feasibility). The data presented in these categories are the result of secondary analyses. These categories serve to provide member states and other users a more complete understanding of the effectiveness of each activity. This list of categories is not intended to be exhaustive.

> **Cost** – describes the anticipated cost of each activity. The analysis should describe if the cost is low (< 1 million USD), medium (1-5 million USD), or high (>5 million USD). The AHEG Secretariat could consider alternate USD range amounts for each category based on existing efforts.
>
> **Maturity** – describes the establishment of a given response option or activity: low – not yet established; medium – ready to be applied or has been piloted (established); or high – fully fleshed out activity already in use (well-established, many examples of use).

Feasibility – describes the ease of implementing the activity, particularly in terms of the extent to which stakeholders (including various levels of government) would need to work together at all levels; low, medium, or high.

Impact – describes the ability of an activity to effectively prevent and/or reduce marine litter and/or marine litter discharge; low, medium, high.

Time Frame – describes the length of time needed for planning and implementation, including long-term activities that require ongoing operation and maintenance time, and short (0-2 years), medium (2-5 years), or long (5+ years) timeframes.

Enabling Conditions – describes any preconditions for the activity to be successful across all relevant descriptive categories. This analysis could describe administrative, policy, finance, infrastructure, or cultural circumstances.

Comments – includes additional details of the activity, such as further information on prerequisites, enabling conditions, or barriers. This will help describe the applicability for each activity to be put into use or implemented in another context (be it a country, city, municipality, region, etc.). This comment box would describe the conditions whereby this action is being implemented successfully. For example, where has this been proven to work and what the specific enabling conditions were (e.g., economic, social, demographic, policy, and geographic - in other words, why does this work in this specific context, etc.).

Annex II. U.S. Suggestions for Categorization of Archetypes/Management Strategies at all levels

Global

1. Political Declarations
    a. Example: APEC Marine Debris Roadmap, G20/G7; Osaka Blue Ocean Vision
2. Voluntary Standards
    a. Example: ISO
3. Voluntary Multi-Stakeholder Platform
    a. Example: Global Partnership on Marine Litter, SAICM, Ellen MacArthur "New Plastics Economy"
4. Private Sector Collaboration
    a. Alliance to End Plastic Waste, Circulate Capital

Regional

1. Regional Seas Conventions
    a. Example: OSPAR Convention; Barcelona Convention
2. Marine Litter Action Plans
    a. Example: Regional Action Plan for Marine Litter (RAPMaLi) for the Wider Caribbean Region
3. Regional Commitments
    a. ASEAN

National (includes subnational)

1. National (or subnational) Action Plans
2. Legislation/Regulation (below are U.S. specific national-level legislation)
    a. Marine Debris Act
        i. NOAA Marine Debris Program
    b. Microbead Free Waters Act
    c. Clean Water Act
    d. Resource Conservation and Recovery Act
3. Integrated solid waste management
        i. Example: Collection, separation and recycling, and disposal
4. Market based instruments
    a. PCR supply
        i. Example: Deposit schemes, EPR
    b. PCR demand
5. Mitigation and Monitoring Efforts
    a. Land based efforts
        i. Example: Storm drain capture, beach clean ups
        ii. Aquatic ecosystem trash removal/capture
            1. Trash wheels, river booms, etc.
        iii. Coastal Cleanups
    b. Sea-based efforts
        i. Fishing gear removal
    c. Aquatic ecosystem removal efforts
        i. Trash wheels, other clean-up efforts
    d. Monitoring and assessment programs
6. Microplastics management[1]
    a. Management of primary source microplastics
        i. Example: Microbead regulations
    b. Management of secondary source microplastics
        i. E.g. Consumer awareness and education on microfibers

[1] While the United States thinks it would be most appropriate to consider microplastics as a cross-cutting issue within the contexts of other archetypes, we recognize there is international interest in looking at microplastics as a specific management strategy. In order to make the methodology more applicable to microplastics, we suggest looking at management strategies for primary and secondary sources separately and binning the management strategies when appropriate, e.g., as ‘microbead regulations’ and ‘consumer awareness and education on microfibers’.