

November 10, 2020  
Written Statement

#### AHEG-4

**Item 4.d: Consideration of paragraph 7 of United Nations Environment Assembly resolution 4/6  
d) Analysis of the effectiveness of existing and potential response options and activities (resolution  
4/6, para. 7 (d))**

On behalf of the Center for International Environmental Law, the Environmental Investigation Agency (EIA), OceanCare, Zero Waste Europe, HEJSupport, the Center for Oceanic Awareness, Research and Education (COARE), and the Global Alliance for Incinerator Alternatives (GAIA), we would like to comment on the report [UNEP/AHEG/4/4](#) *“Summary of the analysis of the effectiveness of existing and potential response options and activities on marine litter and microplastics at all levels to determine the contribution in solving the global problem.”*

We would like to thank the Secretariat for the summary and the preparation of the information document.

Subparagraph 7.d of UNEA resolution 4/6 requested to *“Analyse the effectiveness of existing and potential response options and activities on marine litter and microplastics at all levels to determine the contribution in solving the global problem.”*

We agree with the report in the sense that *“Due to the complexity of this and the large number of variables, further attention can be given to options for strengthening implementation of these response options.”*

However, we do not totally agree with the finding of Subparagraphs 34a and 34 of the Summary, pertaining to the indicators on maturity and feasibility for the following reasons:

First, the maturity indicator should not be used for rating the effectiveness of a new international framework which is not established, yet. Therefore it should be stated that this indicator is “not applicable” here. However, measuring the maturity of the idea to pursue the option for a new international framework should lead to a high rating, as 2/3 of UN Member States have publicly either called for a new global instrument, or agreed to consider such an option to combat plastic pollution.

Second, in case the indicator on Maturity has been used *“for contribution of the response option to solving the global problem”*, it should not be either used for rating the effectiveness of a new international framework, since it is not possible to rate its maturity yet. In this case it should follow the logic of “not applicable”.

Third, the conclusions on feasibility do not reflect the referred document [UNEP/AHEG/2018/1/5](#) *“Discussion paper on feasibility and effectiveness of different response options”*, in which is indicated on *“Establish a new international legally binding architecture”* that *“is technically feasible to negotiate a new internationally binding instrument and (which will be) Effective if duplication with other international instruments is avoided.”* Therefore the feasibility part should be updated accordingly.

*Thank you for your attention,*

