

## **Call for written submissions – Proposed response template on the potential options for elements towards an international legally binding instrument**

On 9 December 2022, the Executive Secretary of the INC Plastic Pollution Secretariat sent a notification inviting written submissions from members of the committee and from stakeholders. The template below is intended to provide guidance to members of the committee and stakeholders in structuring the written submissions.

As requested by INC-1, written submissions will inform the Secretariat in the preparation of a document with potential options for elements towards an international legally binding instrument, for consideration at the second session of the INC, without in any way prejudging what the committee might decide regarding the structure and provisions of the instrument. The document is to be based on a comprehensive approach that addresses the full life cycle of plastics as called for by UNEA resolution 5/14, including identifying the objective, substantive provisions including core obligations, control measures, and voluntary approaches, implementation measures, and means of implementation.

The template below is meant to assist Members and stakeholders to prepare their written submission as a guide. A number of documents prepared for INC-1 are of relevance, notably UNEP/PP/INC.1/5 on 'Potential elements, based on provisions in paragraphs 3 and 4 of United Nations Environment Assembly resolution 5/14, including key concepts, procedures and mechanisms of legally binding multilateral agreements that may be relevant to furthering implementation and compliance under the future international legally binding instrument on plastic pollution, including in the marine environment'.

The template is divided into three sections:

- I. Substantive elements
- II. Implementation elements
- III. Additional input

All written submissions must be sent to [unep-incplastic.secretariat@un.org](mailto:unep-incplastic.secretariat@un.org). The statements received will be compiled and made available the INC webpage.

Please note that it is not required for all fields to be answered in the template for submission.

### **Deadline for submissions:**

- 6 January 2023 for written submissions from stakeholders.
- 10 February 2023 for written submissions from Members of the Committee.

## TEMPLATE FOR SUBMISSIONS

Name of country (for Members of the committee)	Türkiye
Name of organization (for stakeholders to the committee)	Ministry of Environment, Urbanization and Climate Change
Contact person and contact information for the submission	DG Environmental Management dongusel@csb.gov.tr
Date	10.02.2023

### I. Substantive elements

#### 1. Objective(s)

a) *What objective(s) could be set out in the instrument?*

<p>Proposed Objective:</p> <p>To provide coherence, ratify commitments and guide action by States and stakeholders for eliminating plastic pollution in marine and other environments, developing zero waste hierarchy and for abating its adverse effects on human health and well-being, on the environment, and on sustainable development.</p> <p>Explanatory Text:</p> <p>Like in the case of other International Legally Binding Instruments, this instrument will strengthen international cooperation by mobilizing actors, defining the most effective approaches and the rules of cooperation, strengthening science-policy dialogue for a better understanding of the issues and effects of plastic pollution on marine and land ecosystems, mobilizing resources, ensuring coherence of action, safeguarding compliance, maximizing technical assistance, amplifying results, and offering a global forum on issues of plastic pollution.</p>
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#### 2. Core obligations, control measures and voluntary approaches

a) *What core obligations, control measures and voluntary approaches would provide a comprehensive approach to addressing plastic pollution, including in the marine environment, throughout the full life cycle in line with the future objective(s) of the instrument?*

<p>The instrument should introduce global common targets (eg. circularity of plastics) and timelines to reduce the plastic consumption and production addressing the entire lifecycle of the plastic, starting</p>
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with the production, and offer actionable measures at every step. In addition, the instrument needs to commit to reduce additional plastic pollution in the marine environment to zero by a certain year by recalling the Blue Osaka Vision declared by the G20 countries includes "reduce to zero additional pollution from plastic litter in the seas by 2050 with a comprehensive life-cycle approach". At this point, Contracting Parties should contribute to the process by showing their determination. In addition, it is important to establish a monitoring and reporting mechanism with traceable indicators that will assess whether the adopted measures are fulfilled, to evaluate the national monitoring reports produced within the scope of scientific methods and to provide technical and financial support to the countries where they are lacking. The development of appropriate methodologies for monitoring the scientific data to be produced should be the backbone of the Instrument.

It is of great importance to determine within the Instrument a global plastic strategy while preserving our natural resources and eco-systems in order to transition to a healthy and livable environment and circular economy for current and future generations. An internationally binding instrument should aim to protect our environment and reduce marine litter, greenhouse gas emissions and dependence on fossil fuels.

In this manner, this global plastic strategy should include systemic approaches for Circular Economy and eco-innovation, such as sustainable product policy, value chain and taking into account the entire life cycle assessment of plastic products. The instrument would aim to provide entirely new vision for plastics economy, that will encompass design and production of plastics respect reuse, repair and recycling needs as well as development of more sustainable and durable materials.

It is envisaged that the practices brought by the new instrument will be embraced by society and lead to habit changes. Thus, it will be beneficial for citizens to increase their sense of responsibility and awareness about consumption. In this way, we can be sure that the steps we take to protect the environment, biodiversity, and human health will be carried to better places by future generations. The new instrument shall result in more sustainable plastics industry where the product design and production shall enable higher recycling rates also respect the needs of reuse, the rights to repair. The new instrument along with national Circular Economy Strategies and NAPs shall enable economic growth and more jobs while in the same time cutting GHG emissions.

In this direction, issues such as organizing national and global awareness campaigns, exchange of information and best practices, research and development, stakeholder engagement and taking initiatives to include the subject in training programs should be included in the content of the new instrument.

The Secretariat should be obliged to carry out studies that reflect the importance it attaches to the subject in a transparent manner. The Secretariat should also carry out studies on comparability and interactions with other multi-lateral environmental agreements.

It would be beneficial to include a joint effort to ensure the initiatives of the world of science and technology related to the new instrument, which we can describe as a game changer in the coming years, in the content of the new instrument. In the realization of these studies, the Secretariat should be assigned to ensure that countries gain equal benefits in socio-economic and scientific dimensions.

## II. Implementation elements

### 1. Implementation measures

- a) *How to ensure implementation of the instrument at the national level (eg. role national action plans contribute to meeting the objectives and obligations of the instrument?)*
- b) *How to ensure effectiveness of the instrument and have efficient national reporting?*
- c) *Please provide any other relevant proposals or priorities here on implementation measures (for example for scientific and technical cooperation and coordination as well as compliance).*

a) National Action Plans: In order to ensure the implementation of the new instrument by the countries, national action plans should be prepared with the participation of all relevant stakeholders in the country and their views should be reflected in the NAPs. Therefore, a thorough stakeholder analysis is required to have a clear and actionable NAP. In order to ensure the principles of prevention, reduction and elimination, NAPs should include intended national targets, actions to achieve the targets and a timeline of targets, and monitoring and reporting requirements.

National Action Plans ( NAPs) in addition to the complementary tools such as national plastics strategies, national circular economy strategies and action plans, should be main implementation international instrument . The national action plans should be prepared in conjunction to other national relevant policies and circumstances.

The general scope, objectives and minimum requirements for reporting format of the NAPs shall be set by the international instrument, hence the detailed scope shall be set by the Contracting Parties.

Also, as different geographic challenges require different solutions; NAPs should be adaptable to all coverage areas.

NAPs can be a useful tool for promoting national practices, facilitating the monitoring of activities and keeping up with developments. In addition, the NAPs of the countries can set out the current situation regarding the actions so that the actions can be supported financially or technically by the international instrument.

Finally, having in mind the importance of international instrument's implementation it is suggested that it contains provisions on regional and cross border cooperation in the form of the cross border and regional cooperation able to establish the regional centers or commissions. NAPs to be aligned with the international instrument. NAPs should contain provisions on regional and international cooperation for achieving the set targets in the international instrument.

In this context, it is important that the new instrument contains provisions to ensure that countries prepare a national action plan, that financial opportunities and implications are recognized starting from the countries that need the most.

b) Monitoring the effectiveness of the new instrument and national action plans can be considered as two separate issues.

Transparency and timing are significant in monitoring the objectives and the contents of the national action plan.

While preparing the national reporting formats, it is important to consider the effectiveness in the preparation of the formats of the monitoring reports simultaneously.

The mandatory minimum criteria for reporting formats should be set in the international instrument while the optional formats should be at discretion to the Contracting Parties. Experiences and practices from other monitoring frameworks of related international agreements should be taken into consideration.

The frequency of reporting should be defined as well as availability of the reports to a general public.

Such monitoring and reporting can be used as a successful tool in measuring the success of national efforts and the effectiveness of the new instrument. A body responsible for reviewing reports and developing lessons learned would be most advisable.

On the other hand, it is absolutely necessary to have scientific evidence at the core of our work to monitor our national reports.

c) The new instrument should follow up the decisions of the science policy panel on chemicals and waste to prevent pollution by establishing subsidiary bodies such as committees i.e. monitoring committee, technical/scientific committee etc.

That will be expected from the Secretariat of the new instrument to evaluate the monitoring reports within a transparent process and submit the results and recommendations report to all member countries regarding the monitoring of progress. The international compliance mechanism should be established by the international instrument, which will facilitate the progress made in the implementation.

## 2. Means of Implementation

With respect to means of implementation, document UNEP/PP/INC.1/5 covers the following elements: capacity-building, technical assistance, technology transfer on mutually agreed terms and financial assistance.

a) *What measures will be required to support the implementation of the instrument?*

The different capacities and technical structures of the countries should be considered in the Instrument, and it should allow the provision providing the necessary financial funds. In addition, having a specific working unit for marine issues will provide faster results.

The instrument to form a basis for joint work of countries by bringing together not only national and global but also regional actors. Additionally, a functioning and effective mechanism to involve meaningfully categories of stakeholders in the definition of strategies and programs and in the review of progress is crucial. It would involve, among others, designers, plastic industry, trade (e.g. supermarkets), entrepreneurs, local authorities, consumer associations, etc.

Considering all these issues as annexes to the new instrument should also be kept on the agenda. The new instrument should cover broadly the sustainable consumption and production, life cycle assessment of plastics, measures and details describe the national action plans to ensure their implementation on a timely manner. And the new instrument should be established based on EPR and polluter pays principles.

It is essential that the separate collection at source, sorting and recycling, which are the basic principles in the environmentally sound management of plastic waste, is carried out by local governments. In this context, the new instrument should include provisions to determine a roadmap for combating plastic-containing marine litter, which is already a pollutant, and to ensure control measures and monitoring at national, regional and global scales.

Multilateral financial mechanism and technology transfer is imperative to support implementation, including capacity building, technical assistance, and finance. But how can we act together, we believe that today we are looking for the answer to this question. The important thing is to be sure that no one is left behind, as is said at UNEA. It should be our fundamental understanding to act strategically, to benefit from all kinds of investments, private sector, public, and other international financial mechanisms while carrying out studies on this subject.

Programming under existing and incoming financial framework mechanism, technology transfer and co-development should be taken into consideration.

When the new instrument is established, a unit related to budgetary issues should be established, and it should be ensured that it is controlled by a mechanism subject to independent auditing in terms of prioritization, project design, and technology and information transfer in the distribution of financial funds.

As in all other activities, transparency, sensitivity, and financial prioritization on the basis of subject and country are required.

With these mechanisms, we can get an integrated result from the efforts of developing and developed countries and ensure the end of plastic pollution.

The new instrument would encourage the Contracting Parties to put in place effective implementation compliance promotion and enforcement mechanisms to ensure the implantation of the vision set to the national action plans. In order to execute the process of implementation appropriately in the national and local level, sound enforcement mechanisms should be an essential part of the implementation measures. In addition, to ensure effective compliance with the national regulations to be published in line with the instrument, incentive and/or disincentive based enforcement mechanisms should be also adopted.

## Additional input

Please provide any other relevant proposals or priorities here (for example introductory elements; awareness-raising, education and exchange of information; research; stakeholder engagement; institutional arrangements and final provisions).

Different capacities and technical structures of the countries should be taken into account in the Instrument, and it should introduce a provision on providing the necessary financial funds. In addition, having a specific working unit for issues regarding plastic pollution in the marine environment will provide faster results.

The instrument should provide a basis for joint work of countries by bringing together not only national and global but also regional actors.

In this sense, establishment of regional centers should be necessary in order to provide technical assistance, capacity building and to promote the transfer of technology to Parties that are developing countries or countries with economies in transition in order to enable them to implement their obligations under the instrument. The responsibilities of each regional center may differ than other but not limited to one specific subject. On the other hand, every single regional centre may work on the same subject in different region.

Zero waste is an approach to resource and waste management based on circularity. It promotes sustainable production and consumption habits and encourages the efficient use of resources. Zero waste entails avoiding wastefulness and advocating for the prevention, reduction, reuse, and recycling of waste. This can help achieve positive socio-economic outcomes, including the development of social solidarity.

In this context, it would be beneficial to conduct studies on zero waste, support good practices, evaluate expertise and technology transfers, and prepare reports with a scientific approach on the role of plastics in the zero waste approach within the new instrument to be established.