

Second Meeting of the Ad Hoc Open Ended Expert Group on Marine Litter and Micro-plastics

Business and Industry Major Group Submission

The Business and Industry major group welcomes the opportunity to contribute to the second meeting of the Ad Hoc Open Ended Expert Group on Marine Litter and Micro-plastics.

The use of plastics in emerging economies is a sign of a growing middle class with increased access to fresh foods, clean water, personal care products, essential health care items and facilities, energy, connectivity, transportation systems, and employment. Unfortunately, in some regions, growing demand for consumer goods has outpaced the infrastructure needed to manage used materials of all kinds.

Business and industry wants to be part of the solution and appreciates the opportunity to collaborate with member states and other stakeholders to develop policies and initiatives that will have a real impact where help is needed most.

Based on the relevant working papers and information papers prepared for this meeting we would like to highlight the following points for consideration by member states.

Information and Monitoring

- Business and industry appreciates the presentation from the World Health Organization (WHO) and found it to be very informative in terms of highlighting just how much we don't know and that we need to be careful with the conclusions we make with such an incomplete data set.
- The WHO's assertion that we currently don't have data on the impact of microplastics to human health and that the few studies performed to date in marine life have used concentrations that are inconsistent with real world conditions argues for the need for additional information on the impact of microplastics on human health and we welcome additional work in this area. We firmly support interventions made by various member states that the science should inform our actions and that we need to proceed with an evidence-based approach.
- We also agree that a better understanding of sources of marine debris, including the identification of gaps in solid waste infrastructure capacity of member states to reduce leakage of plastic to the ocean.
- We agree that more information is needed in a number of areas. We also agree with member states regarding the need to move quickly in the near-term to advance flexible and feasible actions that will help to reduce the amount of litter leaking into our ocean. Thus, we support prioritization of monitoring of the marine environment, identification of the material entering our ocean, and support for land based waste management.
- We also see a need for additional information regarding the environmental benefits and costs of alternatives to plastics.

- A 2016 study conducted by [Trucost](#), which updated a similar study for the U.N. in 2014, found that replacing plastics in packaging and consumer products with alternative materials could raise environmental costs nearly fourfold. Environmental costs include more food and packaging waste, more fuel used in transportation, more litter, and increased greenhouse gas emissions.
- More recently a 40-strong group led by academics from Heriot-Watt University drawing expertise from engineering, science, economics and social science, said that replacing plastics with other packaging such as glass or metal could double global energy consumption and could lead to a tripling of greenhouse gas emissions. The [UNEP study “Exploring the potential for adopting alternative materials to reduce marine plastic litter”](#) also supports this.
- All human activity has an impact on the planet, thus we have to be careful that a mission to reduce one type of impact, in this case ocean plastics, does not result in the unintended consequence of increasing another.
- We note the discussions by member states indicating some of the unintended consequences of alternatives. For example, problems with so called “biodegradable” materials not actually degrading in the environment under natural conditions or the issue of more material going to landfills after existing plastic products are replaced because alternatives use more material or negatively impact the recycling market. UNEP’s report, [“Biodegradable Plastics & Marine Litter, Misconceptions, Concerns, and Impacts on Marine Environment”](#), noted that “biodegradable” plastics are not the answer to marine litter.

Governance

- Business and industry supports the statements regarding the need for caution when considering a legally binding treaty when there is a great deal of uncertainty and the priorities for such a treaty are not defined. We need to carefully consider the options that would make sense to pursue in a global setting vs regional, national, and subnational settings.
- We also support statements noting the importance of allowing flexibility for countries to choose the options and solutions that fit their situation best. We agree that solutions in some countries may not work in others and countries need to be able to select the policies and actions that fit their national circumstances.
- Business and industry also recognizes the concerns raised regarding the resources involved in negotiating a legally binding treaty and that careful consideration should be made as to what would be the most efficient and expeditious pathway.
- We appreciate the work performed by the UNEP Secretariat to begin to examine the feasibility, effectiveness, limitations, and gaps in existing conventions, agreements, and international bodies and initiatives. This work has reinforced the need to utilize existing mechanisms and expertise as we agree that we must make sure that we do not duplicate efforts that are being undertaken in other fora including but not limited to the Basel and Stockholm conventions, SAICM, MARPOL and the Regional Seas Programmes. We also agree with member states that additional work in this area would be helpful to further identify gaps and how existing mechanisms could be strengthened.

- We agree that better coordination of existing efforts is needed, although question whether a legally binding mechanism would be the most expedient and effective process for increasing coordination.
- We support the need for more harmonized data collection methodologies, standards, common language, common units, as well as mechanisms to increase access to relevant data, however, again we question whether a legally binding architecture is the most effective mechanism of developing responses to these needs.
- We also welcome efforts to explore the feasibility and effectiveness of the Global Partnership on Marine Litter (GPML) or the Global Programme of Action for the Protection of the Marine Environment from Land-based Activities (GPA) to serve in a central coordination role.
- Strengthening of the GPA could include a focus on:
 - Collection, standardization, and dissemination of information related to marine debris.
 - Developing and sharing standardized methods for data collection on waste generation, collection, and treatment.
 - Disseminating information to policy makers on best practices for waste collection, complementing ongoing efforts in other fora (e.g. Basel Partnership on Household Waste); handling, and processing technologies; and information regarding life-cycle assessment and environmental trade-offs of various materials to reduce the chance for harmful substitutions resulting from bad policy decisions.

Options for Policy Makers

In terms of options for policy makers to consider, we believe that we should carefully follow the mandate from the marine litter resolution adopted at UNEA-3. Solutions to the issue of marine litter, and more specifically plastic marine litter, must be viewed in the context of the Sustainable Development Goals (SDGs) and the 2030 Agenda for Sustainable Development.

Plastics are critical to achieving the SDGs, plastic packaged food lasts longer, reducing wastage; use of plastic in pipes facilitates clean drinking water supplies; plastic enables lifesaving medical devices such as surgical equipment and drips; and due to its light weight, plastic use in vehicles has reduced carbon dioxide emissions from the transportation sector.

We agree that the ocean can't wait and suggest the following as options policy makers should consider to take this work forward:

- Further examine voluntary coordinating mechanisms such as the Global Programme of Action for the Protection of the Marine Environment from Land-based Activities and its Global Partnership on Marine Litter (GPML).
- Develop a series of focused, contextually structured cost benefit studies on different aspects including:

- Improving resource efficiency and basic solid waste collection, transport and recycling rates including through new technologies and innovations.
- Collate examples of costs of inaction in different contexts arising from lack of adequate waste management in freshwater, marine environments and on land; inadequate sectoral controls (e.g. fishing gears); poor air quality controls; and climate change.
- Gather information on the status of basic solid waste infrastructure at the national level and regional level including waste characterizations where possible.
- Develop a report on the harmonization of monitoring frameworks, indicators, and data on marine litter, for example between the Regional Seas Conventions; drawing from the ongoing work of the Joint Group of Experts on Scientific Aspects of Marine Environmental Protection.
- Work with other initiatives and conventions to analyze potential investment instruments for waste and wastewater technology infrastructure, research and development and capacity building.
- Analyze the barriers at the national level to enhance solid waste infrastructure and recycling.

Conclusion

We welcome the opportunity to contribute to these discussions. The business community is actively developing forward looking, ambitious, yet achievable, goals. Flexibility in allowing different sectors of the economy and regions to develop their own goals is allowing for the broadest range of commitments to be put forward, which further argues for a sub-global approach to certain issues. We are developing new technologies and innovations to recover value from all plastics, we are designing products and packaging for optimal efficiency and greater recyclability. For example, new innovations are being developed to break down plastics into their basic molecules so used plastics can be a feedstock. These technologies can produce raw materials for new plastics, basic chemicals for manufacturing, transportation fuels, waxes, and lubricants. The plastics industry is also advancing a more circular economy, developing new solvents, additives, and compatibilizers for processing and reusing mixed plastics. We are also working with groups such as Circulate Capital to support innovative financing structures to improve waste management and recycling where it is needed most. We agree that the status quo is not an option and look forward to continuing to engage in this process.