

Organization: **World Economic Forum -- Global Plastic Action Partnership (GPAP)**

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### *Submission to the Secretariat for the INC on Plastic Pollution*

Definitions	
<i>Proposed element</i>	<i>Rationale / Context</i>
The instrument should include clear definitions upfront on “upstream”, “midstream” and “downstream” elements in the life cycle of plastics, including key sub-elements such as “reduction”, “reuse”, “repair”, “recycling” etc.	Clear definitions will be required to ensure the instrument’s effectiveness. They will also be foundational for specifying any target setting, commitments or reporting requirements set out by the instrument. For example, the terms “reuse” and “recycling” are often used interchangeably, or have different meanings depending on the stakeholders’ perspectives, on language/translation, or on context. Existing agreements or resources can serve as a robust foundation to ensure this clarity of definitions. <sup>1</sup>

Principles	
<i>Proposed element</i>	<i>Rationale / Context</i>
The waste hierarchy approach, prioritizing upstream over midstream over downstream solutions to addressing plastic pollution, should inform the scope and substance of the instrument	The waste hierarchy approach prioritizes prevention, minimization and reuse over recycling, recovery and disposal solutions. <sup>2</sup> A full life-cycle approach – aligned with the waste hierarchy principle – will ensure that the instrument takes an ambitious, systems-change approach, addressing root causes in the production and consumption landscape. ‘The most effective way to reduce waste is to not create it in the first place. [...] Reduction and reuse reduce the amount of waste that will need to be recycled or sent to landfills and incinerators.’ <sup>3</sup> Elimination of unnecessary plastics; improved product, packaging and material design to avoid or reduce material use; and the deployment of waste-preventative business models, such as refill and reuse systems, form part of an approach that is aligned with the waste hierarchy principle.

<sup>1</sup> See for example: <https://ellenmacarthurfoundation.org/topics/circular-economy-introduction/glossary>

<sup>2</sup> <https://wedocs.unep.org/handle/20.500.11822/8669>

<sup>3</sup> <https://www.epa.gov/environmental-topics/land-waste-and-cleanup-topics>

	The waste hierarchy principle has also informed the structure and priorities of existing national action plans to address plastic pollution. <sup>4</sup>
The instrument should champion multistakeholder collaboration to unlock systems change	<p>A successful instrument will require buy-in, expertise and implementation support from all actors in the plastics ecosystem, including governments, businesses, civil society, and academia.</p> <p>As a multistakeholder platform hosted at the World Economic Forum, GPAP serves as a leading convener of stakeholders across sectors. Its national partnership platforms (currently active in nine countries<sup>5</sup>) follow the same multistakeholder principle, ensuring engagement from all groups in society. The inclusion of marginalized perspectives, including those of women and informal sector workers, are critical to address the systemic challenge of plastic pollution.</p>
The instrument should enshrine an evidence-based approach	Targets, commitments and other measures will only receive broad support if based on scientific data and evidence. GPAP has championed the development of country-level plastic action based on a rigorous baseline assessment methodology provided by our National Analysis and Modelling (NAM) Tool. <sup>6</sup>

Core obligations, control measures and voluntary approaches	
<i>Proposed element</i>	<i>Rationale / Context</i>
Development and implementation of national action plans	<p>Countries should develop science-based roadmaps to accelerate their transition to a circular, low carbon emissions plastics system. Based on GPAP’s experience in deploying national action plans in multiple countries to date, countries should prioritize:</p> <ol style="list-style-type: none"> <li>1. Assess their plastic pollution situation via a rigorous, data-based approach, a critical foundation for aligning and rallying diverse stakeholders behind a national action plan to address plastic pollution</li> <li>2. Simulate a multitude of solution scenarios and their environmental, economic and social implications.</li> <li>3. Confirm the most effective and realistic System Change Scenario and outlines steps to achieve it.</li> </ol> <p>To deliver on these needs, GPAP’s National Analysis and Modelling (NAM) Tool<sup>7</sup> has to date been deployed in Indonesia, Ghana, Vietnam, Pakistan and Mexico-City. It is based on the Breaking the Plastic Wave methodology and compatible with UN Environment Programme’s (UNEP) and IUCN’s hot-spotting analysis.</p>
Reporting on critical plastic data	Global reporting requirements on key plastic flow data – including data on import/export, production, reuse, waste collection, recycling and disposal – will allow the instrument to ensure a level playing field

<sup>4</sup> See for example the national action plan developed by the Indonesia National Plastic Action Platform (NPAP), p.19: <https://weforum.ent.box.com/s/3dx0h6h3iyab847msnx7iw62kjt5myu>

<sup>5</sup> <https://www.globalplasticaction.org/countries>

<sup>6</sup> <https://weforum.ent.box.com/s/ynv83y4mu5v1ayj42nkwwkl4p9digicp>

<sup>7</sup> <https://weforum.ent.box.com/s/ynv83y4mu5v1ayj42nkwwkl4p9digicp>

	<p>for any target setting and commitments, as well as to assess progress towards achieving the instrument’s objectives.</p> <p>In the absence of a minimum of data available at the global level, the instrument will be unable to deliver on imperatives related to scientific rigor, transparency, accountability and impact.</p> <p>Basing data categories and metrics on existing frameworks such as the Breaking the Plastic Wave methodology and its translation into national efforts via GPAP’s NAM Tool or the UNEP/IUCN hot-spotting analysis provides a robust basis for ensuring consistency.</p>
Alignment of obligations and other measures with waste hierarchy principle	<p>In support of the principle outlined above (see ‘Principles’), core obligations and voluntary measures should be prioritized and specifically broken down by the elements and sub-elements contained in the waste hierarchy. For example, to allow countries and stakeholders to take action in specific solution areas, reuse and other upstream or midstream-focused measures should be defined and specified separately from recycling and other downstream-focused measures.</p>

Implementing measures	
<i>Proposed element</i>	<i>Rationale / Context</i>
National action plans should follow a standardized methodology / template	<p>National action plans should align with an agreed methodology to ensure that any global obligations, control measures or voluntary approaches can be translated transparently and consistently into national-level action. Conversely, progress at the national level can be re-aggregated at the global level to measure progress towards the instruments’ objectives and ensure accountability.</p> <p>In addition, a standardized methodology will facilitate cross-country information exchange, learning and collaboration. It will also facilitate the scaling up of technical assistance and other support programmes that can help countries develop and implement national action plans.</p> <p>GPAP’s National Plastic Action Platforms (NPAPs) have benefited from a standardized approach that is compatible with existing frameworks such as the Breaking the Plastic Wave methodology or the UNEP/IUCN hot-spotting analysis.</p> <p>A standardized methodology and templates to national action plans should not compromise the need to adapt the approach to country-specific circumstances and needs, especially to those of developing countries.</p>
National stakeholders and global institutions should collaborate to scale the development and implementation of national action plans	<p>The instruments should encourage collaboration among countries, stakeholders and leading global organizations in the plastic action space to coordinate their programmes and approaches with a view to facilitating synergies, consistency, transparency and learning, with the ultimate goal of maximizing the impact of national action plans.</p>

<p>Guidelines and standards for relevant life-cycle activities, and related metrics and reporting</p>	<p>In line with the above, and to support a clear set of definitions of key terms, the instrument should require setting shared standards for key activities – and related metrics and reporting - along the life cycle of plastics, such as</p> <ul style="list-style-type: none"> <li>- Eco-design for products and packaging</li> <li>- Reuse and refill solutions</li> <li>- Recycling operations</li> <li>- Disposal</li> <li>- Materials, including and especially undefined categories such as “biodegradable materials”, “bio-based materials” or “bioplastics”</li> </ul> <p>Whenever possible, the instrument should lean on existing standards. In emerging areas, such as reuse standards and metrics, existing work currently underway should be taken into account.<sup>8</sup></p>
<p>National action plans and associated reporting should take into account requisite financing mechanisms</p>	<p>Successful implementation of tailored national action plans will depend on access to capital, both catalytic and conventional. An instrument should acknowledge the role of the broader policy environment in enabling foreign investment, while also creating a mandate for financing</p> <ul style="list-style-type: none"> <li>a) via development assistance intended to de-risk and complement private sector investment,</li> <li>b) via government spending by harnessing e.g., climate and environmentally linked sovereign wealth funds, bonds, and bilateral and multilateral funds earmarked for infrastructure and innovation for plastics circularity<sup>9</sup></li> <li>c) via globally harmonized definitions and standards on financing which will encourage and crowd in private financing aimed at accelerating plastics circularity</li> </ul>
<p>The instrument should take into account the role value chains and trade policy can play in fostering circularity and both address and facilitate the transboundary movement of plastic waste.</p>	<p>Production and consumption patterns are global, including in plastics, and plastics trade accounts for 5% of global trade, even excluding embedded plastics in packaging. Global value chains and trade policy should be harnessed as a comprehensive tool to achieve cross-sectoral impact and scale. Governments can use trade policy to achieve their commitments in line with the instrument. Indeed, failing to bring trade policy in from the start could lead to a reduced impact, given the interconnected nature of value chains.</p> <p>The instrument should account for global coordination on environmentally sustainable plastic trade, substitutes and alternatives, and ultimately plastic waste, in order to foster circularity, including in partnership with the World Trade Organization’s Informal Dialogue on Plastics Pollution and Sustainable Plastics Trade (IDP). The instrument</p>

<sup>8</sup> See for example PR3 Standards (<https://www.resolve.ngo/site-pr3standards.htm>); Reuse Portal resources (<https://www.reuseportal.org/case-studies#>); “Measuring Reuse – Developing a comprehensive approach for reuse measurement and reporting ( [https://www3.weforum.org/docs/WEF\\_Consumers\\_Beyond\\_Waste\\_Summary\\_Document\\_Reuse\\_Metrics\\_Measurement\\_2022.pdf](https://www3.weforum.org/docs/WEF_Consumers_Beyond_Waste_Summary_Document_Reuse_Metrics_Measurement_2022.pdf))

<sup>9</sup> Unlocking Investment for the Plastics Circular Economy: Considerations for Policymakers <https://weforum.ent.box.com/s/k6x9juyyk4uyh8r3yqblpdpwdrriqhe8>

	can reinforce the national implementation of the Basel Convention plastic waste amendments in a way that eliminates illegal waste trade and yet facilitates responsible legal trade for recycling where appropriate.
The instrument and national action plans should be coordinated and aligned with national public policy on general waste management	To be effective, the instrument should cover the producer’s responsibility principle and require that national policy implementation related to general waste management be coordinated and aligned with the models and measures of the treaty. This will improve the effectiveness of the instrument, strengthening complementarity of efforts, maximizing resource efficiencies, and avoiding leakage of materials.

Means of implementation	
<i>Proposed element</i>	<i>Rationale / Context</i>
Support for capacity building and technical assistance	<p>The instrument should foresee mechanisms to support developing, and especially small island states and least developed countries, in developing and implementing national action plans. This should include assistance for key elements, such as local/regional multistakeholder convening (including a special focus on engaging the perspectives of women, informal sector workers and other marginalized groups in society); rigorous, evidence-based baseline assessments and scenario modelling; as well as developing financing roadmaps for addressing plastic pollution.</p> <p>GPAP’s tools (NAM tool<sup>10</sup>, financing case studies and roadmaps<sup>11</sup>, gender and social inclusion assessments<sup>12</sup>, trade policy analyses<sup>13</sup>, etc.<sup>14</sup>) and efforts led by global partners – including UNEP, IUCN, WWF and WRAP – can serve as delivery mechanisms for capacity building and technical assistance.</p>

<sup>10</sup> <https://weforum.ent.box.com/s/ynv83y4mu5v1ayj42nkwwkl4p9digjcp>

<sup>11</sup> See for example Unlocking the Plastics Circular Economy: Case Studies on Investment <https://weforum.ent.box.com/s/o984n3gtao1aul5v736z4umbqisr28io> or Ghana Financing Roadmap: <https://weforum.ent.box.com/s/xq75tbq22z0xh838q4ef6d4te1rmnkxe>

<sup>12</sup> See for example “An Intersectional Gender Equality Strategy for the Ghana National Plastic Action Partnership, 2022-2025 (<https://weforum.ent.box.com/s/q4lbn8rsataq3xqpgs74vpq5jxmx4sc>)

<sup>13</sup> See for example “Trade and Circular Economy: Plastic Action in South Africa”, Global Plastic Action Partnership, 2022: <https://weforum.ent.box.com/s/i61siqa419wywegc3fj7k708kll9d5g3>

<sup>14</sup> <https://www.globalplasticaction.org/tools>