

January 13, 2023

The Honorable Jyoti Mathur-Filipp
Executive Secretary of the INC Secretariat
United Nations Environment Programme
Intergovernmental Negotiations Committee on Plastic Pollution

Dear Executive Secretary Mathur-Filipp:

The undersigned organizations are pleased to provide comments on the proposed approach to develop the potential UN Environment Assembly plastics pollution treaty. We represent a wide range of businesses and manufacturers dedicated to protecting the environment, improving public health, and ensuring long-term economic growth for U.S. businesses and workers, and strongly support the full and effective instrument to eliminate plastics pollution from the environment.

The following are important principles that are critical for UNEA's consideration as you continue with the INC development:

Promote inclusive negotiations and recognize the important role of the business community. The business community is leading the way in developing solutions to address the plastic waste and marine debris entering the world's oceans. We must be included as a critical stakeholder in the INC negotiations process.

Develop materials neutral strategies. Policies should not benefit one material over another, and should be based on the best science and, to the extent consideration of environmental factors is authorized and appropriate, a holistic, comprehensive lifecycle analysis (rather than isolated consideration of only one aspect of a product's life) should be employed to ensure science-based decisions that would appropriately reduce risks and advance sustainability goals.

Recognize the many valuable societal values of plastics and packaging. This [blog](#) offers examples of the practical and innovative plastics solutions that are reducing greenhouse gas emissions and providing benefits for our climate. Our shared policies should not limit access to products that are vital to delivering health care, combating hunger, connecting communities, building infrastructure, and countless other critical missions.

Focus on the elimination of plastics in the environment, not arbitrary bans. Bans rarely work. We instead urge UNEA to advance policies that help create a circular economy, such as promoting widespread adoption of mechanical and advanced recycling technologies, enhancing access to modern waste management systems, and driving new investments in the collection and reuse of all materials. Technologies exist today to recycle plastics. Plastics not

being recycled today could be recycled with sufficient policy support and the infrastructure needed to collect, sort, and process these products.

Catalyze post-consumer materials collection, processing, and recycling infrastructure. Policies and initiatives can incentivize companies to be thoughtful in their packaging and material selection, leading to even greater circularity. Such policies should drive creation of collection, processing, and recycling infrastructure. Recycling plastics saves between 30 and 80 percent of the carbon emissions produced during virgin plastic processing and manufacturing.

Establish a public-private fund. Any financial instrument should provide the opportunity to combine public and private sector investments – and to help create the enabling conditions necessary for the private sector to continue to innovate.

Marine litter and ocean plastics pollution are global challenges that require a comprehensive internationally recognized instrument providing guidance to all countries. We recommend that the U.S. support calls for such an instrument, as progress continues in the United Nations Environment Assembly. We also encourage environmentally sound management practices to support the protection of human health and the environment including a circular economy that reuses valuable resources and promotes free market solutions. Supporting a circular economy and protecting the ocean from marine litter should not be mutually exclusive activities.

We stand ready to assist you.

Sincerely,

Plastics Industry Association

U.S. Chamber of Commerce