

First 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 open-ended ad hoc expert group to further examine the barriers to and options for combating marine plastic litter and microplastics from all sources, especially land-based sources as called for in the Marine Litter and Microplastics resolution from the third UN Environment Assembly meeting.

Plastics are critical to achieving the Sustainable Development Goals, plastic packaged food lasts longer, reducing wastage; use of plastic in pipes facilitates clean drinking water supplies; plastic enables life-saving 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. However, plastic can damage the environment when not managed properly after use and so like the other major groups we agree that plastic litter should not be part of the marine environment.

The International Council of Chemical Associations submitted a position paper which outlines our major points in terms of the barriers and potential response options. We would also like to provide the following summary in response to the papers that were developed for the first ad hoc meeting as well as provide our views on areas which we believe could benefit from additional clarification.

1. The ad hoc group expert should adhere to the resolution that was agreed to at the Third U.N. Environment Assembly meeting. We agree with member states that the discussions should closely follow the mandate that was agreed to in the marine litter and microplastics resolution that was agreed to at UNEA-3, specifically we believe that:

- We must be careful not to duplicate the work of other groups, frameworks and conventions and broaden the scope beyond what was agreed to at UNEA-3. For example, we believe that discussions regarding the toxicity of chemicals or additives to plastics should be addressed within existing frameworks such as SAICM as opposed to developing a new and separate forum for negotiations.
- We note that there are numerous national and international systems and frameworks to address health and environmental concerns regarding chemicals. A large proportion of the plastics which are leaked into the environment are used in the food packaging sector which member states have developed sophisticated regulatory frameworks to ensure health and safety. We believe that a risk-based, evidence based and science based approach is a well-established way to ensure the health and safety of the products we use.

- We agree with the majority of member states that more data and research is needed in order to develop the best policy options and should form the basis of any initial steps.

2. Solutions to the global issue of marine litter, and more specifically plastic marine litter, must be viewed in the context of the United Nation’s Sustainable Development Goals (SDGs) and the 2030 Agenda for Sustainable Development. Proposed solutions should be evaluated for their effects on the Sustainable Development Goals as plastics are widely recognized as key enablers to achieve most of the SDGs.

3. To solve the marine litter problem we must solve the waste management problem.

We believe that the issues of marine plastics and the waste management are inextricably linked. Multiple resolutions from UNEA, along with resolutions from the G7, G20, and APEC note the greatest barrier to combatting marine litter and microplastics is insufficient waste management in rapidly developing countries. A key reason for this is a lack of financing for waste management infrastructure.

4. Waste management is ultimately an issue that is addressed at the municipal, sub-national and national level. Different solutions will be required for different localities. We question whether proceeding immediately to a global framework makes sense and allows member states the flexibility to implement solutions that meet their specific needs.

5. The issue of plastics production must be decoupled from the issue of marine plastics. The Business and Industry group does not agree that marine litter is driven first and foremost by rising global plastic pollution. Figure 5.12 in the report from UNEP “Combating marine plastic litter and microplastics: An assessment of the effectiveness of relevant international, regional and subregional governance strategies and approaches” shows that in developed countries high levels of plastic production does not correlate with high levels of plastic leakage. Additionally, while the growing global middle class is driving projections for plastics production, these projections do not account for individual company actions and innovations such as light weighting.

6. Careful consideration should be given to the terminology used and the potential development of common definitions. There is currently a lot of ambiguity around various definitions. Harmonized definitions for key terms including plastics, microplastics and single-use plastics may help member states and relevant stakeholders engage more effectively on areas of mutual interest.

7. Improving Life Cycle Analysis: We appreciate the efforts of the scientific community and Life Cycle Analysis community to develop approaches for assessing marine litter as a potential environmental impact category in LCAs. We note the work done within the TruCost study that examined the natural capital cost, including the impact of plastics and of alternatives to plastic on the marine environment.

8. We believe a range of solutions will be required to solve the marine litter challenge. We do not believe it is prudent to limit innovation or potential solutions at the outset. For example, waste to energy technologies are being used in some of the cleanest and most advanced cities in the world. Plastics to fuel technologies may help small island states where issues of scale may limit the application of other technologies and developing countries when access to clean fuel is limited. Chemical recycling is providing recycling options for materials that were previously unrecyclable, as well as providing feedstock for other processes.

9. We support a holistic waste hierarchy that includes waste recovery. We must treat waste as a resource and recover its value. We support a waste hierarchy that prioritizes 1) source reduction and reuse; 2) recycling and composting; 3) energy recovery; 4) treatment and disposal.

10. The private sector is currently developing innovations and delivering capacity building programs around the world to help address the issue of marine litter and is eager to do more. Industry can act as a partner and resource in developing solutions and remains committed to working with willing partners to address the issue of marine litter (such as with the Operation Clean Sweep programme) and stop the flow of plastics into our rivers and oceans.