Global Plastics Treaty – transparency requirement for chemical constituents in plastic is a must

Introduction

More than 6000 chemicals are found in plastics, including at least 1518 plastic-related chemicals of concern.[1] These chemicals include intentionally added, also known as additives, to ensure plastic has the essential properties that make it one of the leading materials in various sectors. They include plasticizers, flame retardants, pigments, and stabilizers. In addition, plastic may contain other substances, like solvents, processing aids and non- intentionally added chemicals.

However, no matter whether chemicals are intentionally or non-intentionally present in plastics, they can potentially leach from the polymers and "are released from parent plastic materials as they progressively fragment from the meso to micro and nano scale"[2], due to usage, aging, disposal or recycling.

Some of these chemicals are already banned or restricted by the existing global chemical conventions and the EU regional chemical regulations. Yet they continue to appear in plastic worldwide due to uncontrolled production and recycling, thus contributing to polluting environmental media, people's bodies, and wildlife.

Despite the importance of addressing chemical contamination caused by plastic, information about chemicals in plastic is not disclosed. Lack of transparency for the chemical composition of plastics undermines plastic management to reduce pollution. In this publication, we discuss the urgency of chemical information transparency in plastics and ways to address it within and outside the value chain and throughout the plastic lifecycle. We argue that disclosure of chemical constituents in plastic contributes to plastic pollution reduction, resource efficiency via toxic-free circular economy, and promotes the public right to know.

Poor transparency of information about hazardous chemicals in plastic undermines circular economy

The United Nations Environment Assembly (UNEA) 5.2 adopted resolution UNEP/EA.5/Res.14 for a new global instrument on regulating plastics.[3] The UN responded on May 30, 2022, by launching treaty negotiations in Dakar, Senegal, for an internationally legally binding instrument to end plastic pollution.

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1 Aurisano, N., Weber, R., Fantke, P., 2022. Enabling circular economy for chemicals in plastics. Current opinion in green and sustainable chemistry, 1-13. (https://www.sciencedirect.com/science/article/pii/S2452223621000699).

2 Barrick, A., Champeau, O., Chatel, A., Manier, N., Northcott, G. Tremblay, L.A., 2021. Plastic additives: challanges in ecotox assessment. PeerJ, 1-26 (https://peerj.com/articles/11300/).

3 Resolution UNEP/EA.5/Res.14 (https://wedocs.unep.org/bitstream/handle/20.500.11822/39764/END%20PLASTIC%20POLLUTION%20-%20TOWARDS%20AN%20INTERNATIONAL%20LEGALLY%20BINDING%20INSTRUMENT%20-%20English.pdf?sequence=1&isAllowed=y).

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It is envisaged that strengthened lifecycle management will be one component for reducing plastic waste and pollution and improving material resource efficiencies. Circular economy and related life-based models are gaining ever wider recognition as key strategies to advance the work for sustainable development, including for the achievement of the targets of a number of treaties and agreements beyond those directly linked to chemicals, such as the United Nations Framework Convention on Climate Change (UNFCCC), the Convention on Biological Diversity (CBD), and the Agenda 2030. This is reflected, for example, in a several resolutions adopted by the UNEA over the past few years.[4, 5, 6, 7, 8, 9, 10, 11, 12]

Access to information about chemicals in material cycles is critically important in a circular or life-cycle-based economy. It helps enable informed and appropriate decisions on material choice at the design stage, handling of materials during product manufacturing and use of the products, in connection with managing waste, and reuse/recycling of materials.

For plastics recyclers, information on the monomers[13] used for resins, the polymeric composition[14] of the plastics, and additives is essential for predicting which chemicals, or their break-down products, may interfere negatively with recycling operations. This information is also crucial for ensuring the quality of recyclates and identifying where to safely use the recycled materials.

However, at present, most recyclers operate without knowing what plastic chemicals they deal with. They often mix plastic waste from different sources and with unknown chemical compositions. Recycled plastic used as a secondary raw material may contaminate the value chain by recirculating already banned chemicals back onto the market. Spot checks performed by governments, academia and civil society regularly reveal such chemicals in consumer products.[15, 16, 17, 18] Depending on the concentration of these chemicals, for example persistent organic pollutants (POPs) regulated by the Stockholm Convention, some products may even be considered POPs waste.[19]

Thus, lack of information about the chemical composition of plastics limits markets for plastic recyclers, material resource efficiencies cannot be fully explored[20], and ultimately a non-toxic circular economy cannot be achieved.

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4 Resolution UNEP/EA.4/L.2 (https://papersmart.unon.org/resolution/uploads/k1900824.pdf#overlay-context=node/243).

5 Resolution UNEP/EA.4/L.5 (https://papersmart.unon.org/resolution/uploads/k1900849.pdf#overlay-context=node/231).

6 Resolution UNEP/EA.4/L.6 (https://papersmart.unon.org/resolution/uploads/k1900873_0.pdf).

7 Resolution UNEP/EA.4/L.7 (https://papersmart.unon.org/resolution/uploads/k1900897.pdf).

8 Resolution UNEP/EA.4/L.8 (https://papersmart.unon.org/resolution/uploads/k1900803.pdf).

9 Resolution UNEP/EA.4/L.9 (https://papersmart.unon.org/resolution/uploads/k1900787.pdf).

10 Resolution UNEP/EA.4/L.10 (https://papersmart.unon.org/resolution/uploads/k1900861.pdf#overlay-context=node/271).

11 Resolution UNEP/EA.4/L.23 (https://papersmart.unon.org/resolution/uploads/k1900741.pdf#overlay-context=node/252).

12 Resolution UNEP/EA.5/Res.11 (https://wedocs.unep.org/bitstream/handle/20.500.11822/39920/ENHANCING%20CIRCULAR%20ECONOMY%20AS%20A%20CONTRIBUTION%20TO%20ACHIEVING%20SUSTAINABLE%20CONSUMPTION%20AND%20PRODUCTION.%20English.pdf?sequence=1&isAllowed=y).

13 Important to know, since polymerization is never 100% and some un-reacted monomers can be highly toxic.

14 Important to know, since the identity of polymers and their combinations affect the choice of recycling methods and recyclability of the plastics, and quality of the recyclate.

15 Research Institutes of Sweden, 2019. Mapping and evaluation of some restricted chemical substances in recycled plastics originating from ELV and WEEE collected in Europe. Report 2019:28 ISBN: 978-91-88907-54-7.

16 Swedish Chemicals Agency, 2022. Highly hazardous chemicals in artificial lawns, in Swedish (https://www.kemi.se/kemiska-amnen-och-material/konstgrasplaner-och-fallskydd).

17 IPEN, 2022. Widespread contamination of recycled plastic pellets globally (https://ipen.org/sites/default/files/documents/ipen-recycled-plastic-pellets-v1_2.pdf).

18 WHO, 2018. Circular economy and health: opportunities and risks (https://www.euro.who.int/__data/assets/pdf_file/0004/374917/Circular-Economy_EN_WHO_web_august-2018.pdf).

19 Swedish Chemicals Agency, 2022. Highly hazardous chemicals in artificial lawns, in Swedish (https://www.kemi.se/kemiska-amnen-och-material/konstgrasplaner-och-fallskydd).

20 Swedish Environmental Protection Agency, 2020. Control of substances of very high concern in recycling (https://www.naturvardsverket.se/globalassets/media/publikationer-pdf/6900/978-91-620-6938-4.pdf).

Gaps in information transparency on chemicals in plastic have implications on health

To add on, current recycling practices and standards potentially come with serious health and environmental hazards. The World Health Organization (WHO) discussed this in a report in 2018.[21] Furthermore, in 2021, the UN Special Rapporteur on the implications for human rights of the environmentally sound management and disposal of hazardous substances and wastes, Marcos Orellana, put the spotlight on the human rights implications of toxic chemicals in the lifecycle of plastics, including on the rights of women, children, workers, and indigenous peoples.[22] Orellana called for disclosure of the full chemical composition of plastics and for control and elimination of toxic additives.

The position of the UN Special Rapporteur is supported by new data presented in the report by Human Rights Watch "It's as If They're Poisoning Us': The Health Impacts of Plastic Recycling in Turkey".[23] The report "documents the health impacts of plastic recycling on facility workers and residents living near facilities in Adana and Istanbul, Turkey, a major destination for the European Union's plastic waste".

Global plastic trade and gaps in information transparency cause chaos in developing countries

Despite the obvious environmental and health problems caused by plastic waste, recycling is still considered an important economic sector. For example, in developing countries, plastic waste could be used as a source of income for people, mainly in poor or disadvantaged communities, including women.[24] However, according to the OECD Global Plastics Outlook 2022, "only 9% of plastic waste is recycled (15% is collected for recycling, but 40% of that is disposed of as residues). Another 19% is incinerated, 50% ends up in landfill and 22% evades waste management systems and goes into uncontrolled dumpsites, is burned in open pits, or ends up in terrestrial or aquatic environments, especially in poorer countries"[25]. In addition, potential economic benefits of plastic waste trade are outweighed by the obvious disadvantages, such as the health consequences mainly caused by toxic chemicals in plastic.[26]

The lack of plastic waste recycling capacities in developing countries was recognized by the Basel Convention, which now includes amendments to annexes II, VIII and IX to control the transboundary movement of plastic waste. Plastic waste is now supposed to be traded and recycled only in countries with the necessary capacity to manage waste environmentally soundly. However, little or no information about toxic chemicals in plastic materials, including in waste, is an obstacle for countries to manage plastic waste safely, even if recycling facilities are installed and operating.

Thus, instead of providing countries with opportunities to boost their economies, global plastic trade, in combination with a lack of information transparency on chemicals in plastic, contributes to pollution and worsening the situation of poor communities and vulnerable populations.

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21 WHO, 2018. Circular economy and health: opportunities and risks (https://www.euro.who.int/__data/assets/pdf_file/0004/374917/Circular-Economy_EN_WHO_web_august-2018.pdf).

22 Marcos Orellana, 2021. Report of the Special Rapporteur on the implications for human rights of the environmentally sound management and disposal of hazardous substances and wastes (https://daccess-ods.un.org/access.nsf/Get?OpenAgent&DS=A/76/207&Lang=E).

23 It's as If They're Poisoning Us: The Health Impacts of Plastic Recycling in Turkey (https://www.hrw.org/report/2022/09/21/its-if-theyre-poisoning-us/health-impacts-plastic-recycling-turkey).

24 Washington State University news (https://news.wsu.edu/press-release/2021/05/27/plastic-waste-economic-benefit-developing-countries/).

25 OECD Global Plastics Outlook 2022 (https://www.oecd.org/newsroom/plastic-pollution-is-growing-relentlessly-as-waste-management-and-recycling-fall-short.htm).

26 Plastic waste is hurting women in developing countries – but there are ways to stop it (https://theconversation.com/plastic-waste-is-hurting-women-in-developing-countries-but-there-are-ways-to-stop-it-166596).

UN body recognizes plastic additives as a global threat

The issue of transfer of hazardous chemicals in materials and products that are part of global value chains, i.e. via globalized trade, has been recognized by the Persistent Organic Pollutants Review Committee (POPRC) to the Stockholm Convention on POPs. At the meeting in January 2022, experts agreed that the toxic plastic additives UV-328 and Dechlorane Plus are "likely, as a result of their long-range environmental transport, to lead to significant adverse human health and/or environmental effects such that global action is warranted"[27].

By taking the decisions to control toxic plastic additives, experts demonstrated understanding of the global nature of the plastics economy and supported the work of a technical expert workshop in February 2020 on criteria for substances of international concern beyond 2020.[28, 29] The suggested criteria recognized the issue of transfer of hazardous chemicals in materials and products that are part of global value chains, because such chemicals cause exposure far away from the sources of their original use. It was suggested by the involved researchers that this particularity, in combination with the fulfillment of additional hazard criteria, could motivate the classification of a chemical as a chemical of international concern.

Noting that trade with resins (monomers, partial polymers and complete polymers), plastic items and their wastes is highly globalized, many hazardous chemicals in plastics could potentially be considered chemicals of international concern. They would, thus, need to be managed in a globally harmonized and concerted way.

Disclosure of chemicals in plastics and its merits

Disclosing the chemical composition of plastic materials is the key to informed decisions that will support treaty implementation to efficiently address plastic pollution. It will provide the necessary information for substitution work[30], and justify regulatory actions, such as restrictions and bans for hazardous additives and plastic types.

With this precondition in place, the market for reusable plastics designed for a toxic-free circular economy that is resource efficient and at the same time safe to people and the environment can expand. Investments in waste management, return systems, as well as recycling technologies that do not allow the recirculation of hazardous chemicals in recycled materials will be encouraged.

It will also facilitate safe trade with plastic products and waste by disclosing information on hazardous chemicals throughout plastic life cycles. It will, thus, help make the right decision on recycling and disposal of problematic plastics.

27 Seventeenth meeting of the Persistent Organic Pollutants Review Committee (POPRC 17) (http://chm.pops.int/TheConvention/POPsReviewCommittee/Meetings/POPRC17/Overview/tabid/8900/Default.aspx).

28 Technical expert workshop on criteria for substances of international concern beyond 2020 (https://www.gu.se/en/fram-chemical-risk-assessment/news-and-events/conferences-and-workshops).

29 Technical expert workshop on criteria for substances of international concern beyond 2020 (https://unitar.org/technical-expert-workshop-criteria-substances-international-concern-beyond-2020).

30 Substitution work is the systematic replacement of hazardous chemicals with the least hazardous or non-hazardous alternatives.

A Global Minimum Transparency Standard (GMTS) as a way forward towards information disclosure

An option to disclose information on chemicals in plastic could be based on the already proposed concept for GMTS[31], as relevant to plastic materials.

In short, the GMTS concept promotes globally harmonized transparency for chemicals of concern, starting with those already regulated in global multilateral chemicals and waste treaties or regional progressive legislation:

Stockholm Convention chemicals: They include legacy chemicals and chemicals that currently still have some use-exceptions of relevance to plastic materials. Many studies have shown that Stockholm Convention legacy chemicals are re-circulated with recyclates in the economy.

Basel Convention Chemicals: The Basel Convention includes provisions for hazardous metals relevant as additives in plastics (see, e.g. Turner and Filella, 2021)[32]. It also contains provisions for hazardous and non-hazardous plastic waste covered by the pre-informed consent procedure (PIC), which could be interpreted to include controls on additives.

Rotterdam Convention Chemicals: The Rotterdam Convention requires the PIC procedure for some metals and organic compounds relevant to plastics.

EU Substances of Very High Concern (SVHCs): The EU SVHCs cover many hazardous chemicals beyond those included in the above-listed treaties. Many chemicals with SVHC properties are relevant to plastic materials.[33] SVHCs are identified using the same inherent hazard properties as prioritized for information disclosure by the SAICM Chemicals in Products Programme.[34] Thus, the SVHC concept builds upon an already multilaterally recognized instrument. Keeping track of restricted and banned chemicals with inherent hazard properties corresponding to SVHCs[35] is essential for establishing a safe, non-toxic circular economy.[36]

As the legal elements above are updated, the GMTS should be updated accordingly.

With very few exemptions, no formal transparency requirements exist for the chemicals in the above-mentioned global treaties. Spot checks made by government authorities, academia, and civil society organizations repeatedly show that chemicals regulated (banned or restricted) by these treaties are often present in consumer products, e.g. from recycled materials.[37, 38, 39, 40] Including chemicals from these treaties into the GMTS would, thus, address an information gap and promote treaty implementation.

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31 Global Minimum Transparency Standard (https://www.globalchemicaltransparency.org/wp-content/uploads/2022/02/GMTS-White-Paper.pdf).

32 Turner, A., and Filella, M., 2021. Hazardous metal additives in plastics and their environmental impacts, Environment International 156, 1-10.

33 Use filtering options for the use of chemicals or based on industry sections in the SIN list (https://sinlist.chemsec.org/).

34 UNEP Chemicals in Products Programme, section IIB, chemical scope (https://www.saicm.org/Portals/12/documents/meetings/ICCM4/doc/K1502319%20SAICM-ICCM4-10-e.pdf).

35 Substances of Very high Concern (https://echa.europa.eu/candidate-list-table), based on Article 57 of the REACH Regulation (https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32006R1907&from=EN).

36 WHO, 2018. Circular economy and health: opportunities and risks (https://www.euro.who.int/__data/assets/pdf_file/0004/374917/Circular-Economy_EN_WHO_web_august-2018.pdf).

37 Research Institutes of Sweden, 2019. Mapping and evaluation of some restricted chemical substances in recycled plastics originating from ELV and WEEE collected in Europe. Report 2019:28 ISBN: 978-91-88907-54-7.

38 Swedish Chemicals Agency, 2022. Highly hazardous chemicals in artificial lawns, in Swedish (https://www.kemi.se/kemiska-amnen-och-material/konstgrasplaner-och-fallskydd).

39 IPEN, 2022. Widespread contamination of recycled plastic pellets globally (https://ipen.org/sites/default/files/documents/ipen-recycled-plastic-pellets-v1_2.pdf).

40 WHO, 2018. Circular economy and health: opportunities and risks (https://www.euro.who.int/__data/assets/pdf_file/0004/374917/Circular-Economy_EN_WHO_web_august-2018.pdf).

Transparency of information about polymers

Ideally, the transparency of information about chemical content of plastics should also cover disclosure of mono- and polymers from the beginning.

The American Society for Testing Materials (ASTM) International Resin Identification Coding System gives information only about the main polymer constituent in plastic materials.[41] However, plastics often consist of mixtures of polymers that may affect recyclability.[42] Therefore, the information provided by the coding system may be insufficient for a recycler to make an informed decision about the suitability of recycled plastics for a specific application with specific quality specifications. Furthermore, different countries have adopted different versions of the International Resin Identification Coding System or modified it.

Transparent information about the monomers used for manufacturing the plastics and the composition of homo- and co-polymers of the finished plastic product would significantly enhance the power of informed decisions along the lifecycle of plastics. It could boost material resource efficiencies in the plastic circular economy. As long as transparency for only the identity of monomers, homo- and co-polymers is requested, and not information about proportions, confidential business claims should not be an issue or valid.

At present, few jurisdictions have taken any significant steps to improve access to information on hazard properties of mono- and polymers and their use. The EU is now in the process of doing an oversight of the REACH regulation[43] and is looking at adding increased requirements for registrations of mono- and polymers.[44]

Transparency information about chemicals with epigenetic effects, including endocrine disrupting chemicals

Chemicals that cause epigenetic interferences[45] need much more attention in the future, as they may explain the etiology behind complex diseases, such as cancer and diabetes. Some epigenetic interferences may become hereditary, with inter-generational impacts. It is known that plastic chemicals, including bisphenols and phthalates, may cause epigenetic interferences.[46, 47, 48, 49, 50, 51] Some of these chemicals are also endocrine disruptors (EDCs).[52]

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41 ASTM International Resin Identification Coding System (https://www.astm.org/d7611_d7611m-21.html).

42 Samper, M.D., Bertomeu, D., Arieta, M.P., Ferri, J.M., López-Martinez, J., 2018. Interference of biodegradable plastics in the polypropylene recycling process. Materials 1-18.

43 REACH is the EU legal act with provisions for chemicals management, mandatory for the member states to adopt into national legislation (https://echa.europa.eu/regulations/reach/legislation).

44 REACH refit evaluation (https://ec.europa.eu/info/publications/reach-refit-evaluation_sv).

45 Epigenetic interferences are caused by environmental stimuli, e.g. chemicals, modifying methylation patterns of genes and associated proteins in the DNA helix, which in turn affects the activity of the genes without changing the underlying genomic sequences. Although epigenetic effects can be reversible, some modifications may become hereditable and cause inter-generational impacts.

46 Sing, S., and Li, S S.-L., 2012. Epigenetic effects of environmental chemicals Bisphenol A and Phthalates. International Journal of Molecular Sciences, 10143-10153.

47 Weinhold, B., 2021. More chemicals show epigenetic effects across generations. Environmental Health Perspectives 120, no.6, A128.

48 Mannikam, M., Tracey, R., Guerrero-Bosagna, C., Skinner, M.K., 2013. Plastics derived endocrine disruptors (BPA, DEHP and DBP) induce epigenetic transgenerational inheritance of obesity, reproductive disease and spermeipmutations. PLOS One, vol. 8, 1-18.

49 Van Cauwenbergh, O., De Serafino, A., Tygat, J., Sourby, A., 2020. Transgenerational epigenetic effects from male exposure to endocrine-disrupting compounds: a systematic review on research in mammals. Clinical epigenetics 12.65, 1-23.

50 Engdahl, E., Svensson, K., Lin, P.-I. D., Alavian-Ghavanini, A., Lindh, C., Rüegg, J., Bornehag, C.-G., 2021. DNA methylation at GRIN2B partially mediates the association between prenatal bisphenol F exposure and cognitive functions in 7-year-old children in the SELMA study, Environment International 156, 1-8.

51 Li, Y., Lu, X., Yu, N., Li, A., Zhuang, T., Du, L., Tang, S., Shi, W., Yu, H., Song, M., Wei, S., 2021. Exposure to legacy and novel perfluoroalkyl substance disturbs the metabolic homeostasis in pregnant women and fetuses: A metabolome-wide association study. Environment International 156, 1-10.

52 An endocrine disruptor is a chemical that may interfere with the functions of hormone systems in organisms.

In 2022, the European Commission published a draft act setting out new CLP Regulation[53] hazard classes, including for EDCs. It notes that the need to establish legally binding hazard identification of EDCs is highlighted in the Commission's "Chemicals strategy for sustainability towards a toxic-free environment"[54], and is based on "the increased scientific knowledge and experience gained in identifying endocrine disruptors for human health and the environment".[55]

Chemicals with epigenetic potentials other than via EDC mechanisms may need separate criteria to be developed in the future.

How should the disclosed information on the chemical composition of plastics be handled?

The best and most effective way to handle data is in a centralized way. It could be passed on to downstream users, e.g. in the form of a product passport[56], or similar.

Chemical composition data for plastics should be publicly disclosed, or else it will not support informed decisions for all life stages of plastic lifecycles.

Paragraph 22 of the Dubai Declaration, stating that "information on chemicals relating to health and safety of humans and the environment should not be regarded as confidential"[57], must in this respect be honored. As long as there is no mandatory requirement to disclose exact concentrations of the plastic chemicals included in the suggested harmonized transparency requirement, honoring this paragraph should not be an issue for resin suppliers and plastics manufacturers.

A good example of a centralized system for disclosing information about chemicals in material and product life cycles is the EU regional SCIP database[58], developed by the European Chemical Agency to provide greater information transparency to manufacturers, consumers, and recyclers. According to the EU requirements, all SVHC from the EU Candidate List in concentrations of at least 0.1% by weight of all constituent components of products, including waste and waste materials traded to be reused or recycled, must be reported to the EU Chemicals Agency and will be included in the database.[59] This transparency requirement targets all manufacturers in the EU, and importers of materials and products to be placed on the EU market. Since January 2021, the SCIP database has displayed more than 7 million searchable article notifications, from nearly 7 000 companies across the EU. To improve traceability of materials, the EU is in the process of developing product passports that could link to data in the SCIP database.[60]

The SCIP database is only regional to the EU, and corresponding disclosure requirements do currently not exist outside the EU. However, discussions about a similar system is underway in other countries.

53 The CLP Regulation is the legal act that has provisions for how the EU member states shall implement the Globally Harmonized System (GHS) (https://echa.europa.eu/regulations/clp/legislation).

54 EU chemicals strategy for sustainability (https://echa.europa.eu/hot-topics/chemicals-strategy-for-sustainability).

55 Hazardous chemicals – updated rules on classification, labelling and packaging (https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13578-Introducing-new-hazard-classes-CLP-revision_en).

56 This could, e.g, be a printed specification of polymers and additives, or an electronic tag that can be retrieved by all stakeholders in plastic life cycles.

57 Dubai Declaration, underlying the Strategic Approach to International Chemicals Management, p. 11 (https://www.saicm.org/Portals/12/documents/saicmtexts/SAICM-publication-EN.pdf).

58 EU SCIP database (https://echa.europa.eu/sv/scip-database).

59 Substances of Very High Concern (https://echa.europa.eu/candidate-list-table), based on Article 57 of the REACH Regulation (https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32006R1907&from=EN).

60 Digital product passports (https://ec.europa.eu/commission/presscorner/detail/en/ip_22_2013).

Suggested way forward

We strongly recommend that the Parties developing and negotiating the prospective plastics treaty to include ambitious and binding requirements for harmonized transparency of information of chemicals used in plastic production and in plastic materials and products in the Plastic Treaty.

These harmonized requirements will ensure that manufacturers and suppliers of plastic resins disclose information about the additives, processing aids, and monomers used in the manufacturing process, as well as disclose the composition of homo- or co-polymers in the resins throughout plastic lifecycle. Provisions for publicly disclosing and transferring this information to all downstream stakeholders in the entire product lifecycle must be part of the prospective plastics treaty.

We recommend the Inter-governmental Negotiation Committee to establish a work group for elaborating the scope of the harmonized transparency standard for information on chemicals in plastic, and formats for how the disclosed information should be transferred between stakeholders along the entire plastics lifecycle.

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