

WPC Recommendation on the “Proposals to amend parts of the Basel Convention, considered at the 14th Conference of the Parties.”

The World Plastics Council (WPC)ⁱ appreciates the opportunity to provide our perspective and recommendation on the *Proposals to amend annexes II, VII, and IX of the Basel Convention to be considered at the fourteenth meeting of the Conference of the Parties*, to be held in Geneva on 3rd to 5th May.

Plastics have unique material properties which are essential to ensure a sustainable future society, for example by reducing greenhouse gas (GHG) emissions and contributing towards climate change avoidance goals. The plastics industry is firm and united in its view that “end-of-life plastics” must not end up in the environment, and that the industry has a major role to play in delivering innovative, circular solutions. The scale and complexity of the challenge will require careful coordination among public and private sector stakeholders. It will also require a range of solutions which together create a cohesive and interdependent system to support sustainable consumption, improved products and delivery mechanisms, as well as waste policies and systems which incentivize efficient and well-managed collection and processing.

Work is underway to deliver solutions to a waste-free future. CEOs from our industry have launched an unprecedented effort to help end plastic waste in the environment. Working with leading consumer goods, recyclers and waste management sector, the Alliance to End Plastic Waste (AEPW)ⁱⁱ, has committed \$1.5B over the next five years to seed and leverage a range of investment in waste management infrastructure. To succeed, the private and public sectors must work together to provide effective waste management systems and infrastructure, including new business models that create a value for used plastics, and therefore a stronger economic incentive to avoid plastic leakage to the environment.

A collateral benefit of this work will be a more resource efficient and circular economy for *all* products and *all* materials. The need is urgent: the World Bank estimates that at least 33% of global waste is not managed in an environmentally safe manner.ⁱⁱⁱ Fortunately, improved waste treatment systems and technologies are already emerging to generate value from used plastics. Using these technologies to turn used plastic into new feedstock could create a new, economically viable circular economy for used plastic, stimulating innovation in the next decades.

With that in mind, it is therefore critical that policies impacting trade in used plastics be designed to support and incentivize (rather than unnecessarily restrict and discourage) movement and exchange of this commodity. The Basel Convention has an opportunity to help accelerate solutions, while at the same time ensure that the trading of waste and used plastic is also performed in a sustainable and environmentally sound manner.

The WPC acknowledges and agrees that some countries lack infrastructure to properly manage used plastic, which could lead to environmental and health impacts. We also agree that an update of the waste listings for plastics under the Basel Convention could encourage investments in recycling to enable a more local circular economy.

However, WPC fears these well-intended amendments would have significant unintended consequences. For example, the proposed restricted B3010 category (which will only apply to “single polymer uncontaminated plastic waste”) considered in the Norway proposal will inhibit, at least in the short and medium term, recycling of high quality plastic wastes (e.g. used polyethylene terephthalate (PET) bottles, which are typically mixed with caps made from polyethylene or polypropylene). In this situation the mixture of polymers does not limit recyclability, as separating the polymers can be performed easily and safely after the material is shredded.

In addition, the proposed amendment could create a barrier to innovative new technologies such as chemical recycling which are being developed specifically to recover some mixed or contaminated plastic wastes. Because in practice many countries will have insufficient time to increase their domestic recycling infrastructure, or improve their capacity to manage new and potentially diverse plastic waste streams under the Convention’s prior notice and consent requirements, the proposal in its current form could hinder efforts to address the plastic waste challenge. So in effect the amendment may exacerbate the many problems arising from inadequate municipal waste management infrastructure, and potentially result in an increase in plastic leakage to the environment.

Future investment in global waste management infrastructure will be key to addressing current waste challenges. While we share a bias for action, it is important that the parties to the Basel Convention not inadvertently act to inhibit or discourage investment in countries that may be actively looking to build their plastic waste management infrastructure and capacity, and/or ability to accept waste from other nations (e.g. for potential use as a chemical recycling feedstock).

Recommendation:

To avoid unintended adverse consequences, we recommend that the proposed changes to the annexes be deferred, to allow for the creation of an expert working group to first fully analyze the practical implications and consequences of the amendments proposed by Norway. We specifically request that this work group should focus on more precisely defining the terms ‘mixed waste’ and ‘contaminated’, to help allow environmentally sound management of waste without unduly restricting safe recycling routes.

The World Plastics Council (WPC) is the platform led by CEOs of the world's leading plastic resin producers, including companies based in Europe, North and South America, Japan, China, Russia, the Gulf, India and Thailand. WPC members are: Americas Styrenics, BASF, Borealis, Borouge, Braskem, Chevron Phillips Chemical, China Petrochemical and Chemical Industry Federation, Covestro, Dow, Equate, ExxonMobil, INEOS Styrolution, LyondellBasell, Nova Chemicals, PTT Global Chemical, Reliance Industry Limited, Shell, SCG, Sibur, SABIC, Total and Trinseo. The WPC receives secretariat support and institutional sustainability expertise from large regional/national plastics association heads from North America, Europe, the Gulf and China.

ii <https://endplasticwaste.org/>

iii <https://www.worldbank.org/en/news/immersive-story/2018/09/20/what-a-waste-an-updated-look-into-the-future-of-solid-waste-management>