

November 9, 2023

Jyoti Mathur-Filipp
Executive Secretary
Secretariat for INC on Plastic Pollution
United Nations Environment Programme

Re: Private Sector Engagement Following INC-3

Dear Ms. Mathur-Filipp:

The undersigned business organizations across North America appreciate the opportunity to collaborate with UNEP and the INC Secretariat on development of the proposed international legally binding instrument to end plastic pollution in the environment.

We applaud your interest in leveraging the expertise, technology, and best practices of the private sector and continuing to foster public-private partnerships on these issues. This coalition urges the INC to continue engaging stakeholders in meaningful discussions on important priorities and outcomes as it considers needed changes to the zero draft to ensure a framework that effectively addresses plastic waste, protects human health and the environment, and catalyzes business innovation.

Our groups propose holding a forum following Plastic Pollution INC-3 to identify what is needed to continue driving technology innovation that would prevent plastic waste, and to develop principles in support of those efforts. Working with UNEP, US negotiators, and other key global and national leaders, our proposed forum will convene the private sector, government, diplomatic, and NGO stakeholders to create strategies for public-private partnerships and to reinforce the importance of the Multi-Stakeholder Action Agenda that is being developed, upholding our shared responsibility.

Following is a summary of priorities we will build from during the session, compiled from our conversations with the business community, policymakers, and leading NGOs:

Foster ambitious action and bolster innovation. The current rate of plastic waste leaving our economy and entering the environment is unacceptable. Preventing plastics pollution in the environment and the research, development, and deployment of new plastics and new materials will require ambitious action to be matched by equally ambitious investments in innovation for achievement.

An all-of-the-above approach to technology with the potential to reduce plastic waste is essential to incorporating as many industry segments as possible in deploying solutions. Innovative technologies, including advanced recycling, can provide solutions for such industries and allow a greater and more sustainable flow of plastic waste feedstocks to manufacturers enabling greater amounts of high-performance recovered plastics.

Support a nonprescriptive, balanced, and country-driven approach. The need for a balanced approach that acknowledges the challenges faced by many countries must be underscored. A framework in which targets are set and countries determine how to reach them based on national circumstances would drive an ambitious agreement that all governments can join and implement.

Targets, if set properly, can send helpful market signals to the private and public sectors, and national action plans allow for realistic and effective strategies to be put in place by each country. We do not support targets aimed at curbing demand, production limits, product bans, price ceilings or any other measures that would hinder competitiveness. The focus should be on ensuring that all governments, especially developing economies, can effectively participate in any sort of agreement.

Additionally, it is crucial that we temper this country-by-country approach with learnings from current challenges implementing the Paris Agreement. For example, significant multilateral finance must be unlocked to allow for the implementation of a plastics treaty where progress is not limited to only the wealthiest countries and national action plans can become more ambitious over time.

Focus on the elimination of plastics in the environment and promotion of circularity, not arbitrary bans. The zero draft does not include specific measures to increase circularity. A plastic waste reduction agreement with sweeping material and production bans would not provide the necessary flexibility for every member state and industry segment to meaningfully participate. Essential uses must be recognized in the agreement. Instead, we urge parties to advance policies based on sound science and objective, transparent criteria that address sources of plastic pollution in a targeted manner and help create a circular economy.

These policies should promote circularity throughout the plastics product life cycle, facilitate widespread adoption of mechanical and advanced recycling technologies, enhance access to modern waste management systems, catalyze innovation in product design, and drive new investments in the collection systems and reuse of all materials. Plastics not being recycled today could be recycled with sufficient policy support, upgraded municipal capabilities, and the infrastructure and technologies needed to collect, sort, and process these products and develop new markets.

Promote inclusive negotiations, collaboration, and recognize the pivotal role of the business community. The magnitude of the challenges demand collaboration. No one organization, sector, or country can go it alone. The United States' recently launched End Plastic Pollution International Collaborative (EPPIC) as one example of bringing the best of the public and private sectors together to build capacity in the developing world. Another example is the National Agreement for the New Plastics Economy in Mexico, where the Mexican private sector and Senate together established ambitious goals by 2025 and 2030 on collection rates, recycled content and the transition of all plastic packaging to be reusable, recyclable, compostable, or recoverable by 2030.

Our proposed convening would help promote the innovation priorities needed and address the challenges to achieving them. Businesses in the North American market know firsthand how local and regional coordination can spur business action, incentivize new investments, and reduce barriers to the spreading and scaling of ideas, solutions, and capacity.

The North American business community is leading the way in developing innovative technologies and new materials to address the plastic waste and marine debris entering the world's oceans and the environment. Several significant knowledge gaps also persist within the continuum of plastic waste management where further collaboration between companies, policymakers, NGOs, and multilateral organizations would help. For instance, a microplastics research framework like the International Council of Chemical Associations' [Microplastics Advanced Research and Innovation Initiative \(MARII\)](#) would provide the data alignment and information exchange necessary to properly understand microplastics.

Plastic pollution is a global challenge that all stakeholders must come together to meet, including industry, government, the environmental community, and consumers. We must prioritize solutions first to eliminate plastic waste in the environment. We believe that more engagement around INC-3 will reinforce these essential principles and provide a springboard into meaningful discussion during the negotiations and intersessional efforts.

The business community stands ready to assist INC's efforts and looks forward to further collaborative opportunities throughout the development of a proposed plastics treaty.

Sincerely,

US Chamber of Commerce

Comisión de Estudios del Sector Privado para el Desarrollo Sustentable (CESPEDES)
(Commission of Private Sector Studies for Sustainable Development)

Canadian Chamber of Commerce

Alliance for Automotive Innovation

American Chemistry Council

American Fuel & Petrochemical Manufacturers

Communications Cable & Connectivity Association

Indiana Chamber of Commerce

International Bottled Water Association

Personal Care Products Council

Plastics Industry Association (PLASTICS)

PRINTING United Alliance

Vinyl Institute

The Vinyl Institute of Canada

US Council for International Business (USCIB)

cc:

The Honorable Ambassador Katherine Tai, US Trade Representative

The Honorable Jennifer “J.R.” Littlejohn, Acting Assistant Secretary, Bureau of Oceans and International Environmental and Scientific Affairs, US Department of State

The Honorable Marissa Lago, Under Secretary of Commerce for International Trade, US Department of Commerce

The Honorable Chrystia Freeland, P.C., M.P., Deputy Prime Minister and Minister of Finance of Canada

The Honorable Steven Guilbeault, P.C., M.P., Minister of Environment and Climate Change of Canada

The Honorable Mélanie Joly, P.C., M.P., Minister of Foreign Affairs of Canada