

POSITION PAPER

PROPOSALS FOR A GLOBAL PLASTICS TREATY THAT BOOSTS CIRCULARITY AND SUSTAINABILITY TO ELIMINATE PLASTIC POLLUTION

VinylPlus[®], the European PVC industry's commitment to sustainable development, supports the development of the "international legally binding instrument on plastic pollution" (hereafter, ILBI), including in the marine environment, which could include both binding and voluntary approaches, based on a comprehensive approach that addresses the full life cycle of plastics.

PVC is the third most produced polymer in the world¹. Most PVC applications are long-lasting, and PVC products bring critical societal benefits² (see Annex II). As such, it is critical to ensure that PVC becomes sustainable throughout the lifecycle of its applications and circular in all parts of the world. The EU PVC industry has worked towards this goal for over 20 years with three successive sustainability commitments (Vinyl 2010, VinylPlus 2020 and VinylPlus 2030). Based on this experience, VinylPlus can provide a blueprint and concrete solutions for how voluntary industry approaches can effectively support the implementation of binding global, regulatory instruments to achieve the objectives of the treaty. These approaches can in no way substitute binding requirements, only strengthen them through additional, monitored voluntary action. Given our efforts to develop circular business models and promote third-party sustainability certification, VinylPlus can also outline impactful action to combat plastic pollution.

In this paper, we'd like to put forward three key elements which VinylPlus believes should be integrated into the future ILBI:

1. A clear framework allowing for the systematic monitoring of voluntary industry commitments to complement binding global provisions.
2. An application-based approach to tackle challenges linked to plastic uses.
3. Ambitious provisions to boost circularity.

A clear framework supporting monitored voluntary industry commitments to complement binding provisions.

The plastics industry is global, which allows the industry to implement fast action and accelerate progress towards ending plastic pollution through voluntary action. We can bring global ambitions to market realities. The European Plastics industry has already begun the journey towards circularity. The ILBI presents an opportunity to build on the progress already achieved.

For example, through successive 10-year commitments, VinylPlus has supported PVC in achieving:

¹ Plastics, the facts 2023 [Plastics – the fast Facts 2023 • Plastics Europe](#)

² [Infographic: PVC from production to recycling](#)

- The substitution of lead stabilisers in PVC in a proactive way, ahead of regulation
- Proactive phase out of cadmium stabilisers
- Proactive phase out of low molecular weight ortho-phthalates and replacement by safe high molecular weight ortho-phthalates and other plasticisers; this was achieved over 25 years in the EU with investments of over 6 billion Euros.
- Strong increase in PVC recycling, with 8.1 million tonnes of PVC recycled since 2000.

VinylPlus 2030³, the third 10-year Commitment of the European PVC industry to Sustainable Development, is built on clear targets to scale up PVC Value Chain Circularity to advance towards Carbon Neutrality and Minimise our Environmental Footprint and Building Global Coalitions and Partner for the SDGs.

VinylPlus believes that several aspects of its commitment can serve as a blueprint for measures to eliminate plastic pollution. Specifically, we propose that wording be added under Part IV of the ILBI with a new section on voluntary industry commitments. Such commitments should follow guiding principles:

1. Industry commitments should seek to involve full value chains with the clear objective of achieving a sustainable circular economy globally.
2. Targets and deadlines should be measurable and demonstrably contribute to achieving the objectives of the ILBI and/or national plans.
3. Targets should cover safe production, use, and waste management with reuse and recycling as key elements.
4. Transparency and accountability should be guaranteed through the involvement of external third parties in the monitoring and verification of progress and achievements (i.e. audit of monitoring reports, monitoring committee involving different stakeholders including regulators).
5. Commitments should include science-based and holistic solutions, underpinned by system-thinking.

Objectives and targets should be regularly reviewed to ensure industry commitments continue to be effective and ambitious.

An application-based approach to solve challenges linked to plastic uses.

VinylPlus believes that an application-based approach is necessary to address plastic pollution while preserving the positive contribution of plastics such as PVC to sustainability^{4 5}.

VinylPlus supports:

1. Having a plastic-application-based decision tree approach to identifying problematic applications and solutions. Decisions should be taken after comparative life cycle assessments have been conducted, to avoid regrettable substitution.
2. Using existing tools: VinylPlus believes that tools such as Life Cycle Assessments and Environmental Product Declarations should be used to assess the impact of products.

³ [VinylPlus 2030 Commitment - VinylPlus](#)

⁴ [Our contribution to sustainability - VinylPlus](#)

⁵ [PVC-from-manufacturing-to-recycling.pdf \(vinylplus.eu\)](#)

3. Acknowledging positive contributions of plastic applications to the environment, society and the economy and addressing challenges holistically. For example, freshwater supply (especially in the global south), medical devices, renewable energy, etc.
4. Coherent, science-based global policy: Global policies must remain coherent and not overlap, create confusion, or overcomplicate systems (Basel Convention, Stockholm Convention, Global Framework of Chemicals, etc). We strongly believe policies on chemicals used in plastics as well as plastics must remain science-based and consistent, creating predictability for industry to invest in its transition.
5. On additives, to incentivise global harmonisation, we propose leveraging existing chemical management schemes (UN Global Chemicals Framework agreed in September 2023, regional or national systems such as REACH in Europe, and other comparable chemical management systems) for countries which do not yet have such systems.

Ambitious provisions to boost circularity

VinylPlus believes an effective system to promote circularity must combine:

1. Transparency, traceability, and verification on additives: third-party transparency tools should be encouraged. Information disclosed should, as much as possible, be harmonised e.g. ICCA global additives database. Traceability is a key enabler of a circular economy. Knowing what additives are present in a product helps recycle them effectively. A system is needed to centralise and track information about the impact of a product from raw material to end of life.
2. Safe circularity: Chemical management systems (REACH, etc), should identify ways to ensure plastics which contain additives can be safely recycled.
3. Design for recycling: Plastics must be designed in a way that enables their recycling. Design for recycling can be supported by standards. For example, CEN is developing such standards for flooring, packaging, and windows⁶.
4. Extended Producer Responsibility: EPRs can be an effective solution to enhance traceability and circularity, ensure the producers are responsible for the management of their products throughout their lifecycle, and finance waste management. We support such schemes provided they are carefully thought through to incentivise good waste management, promote value chain and consumer responsibility with appropriate redistribution of funds and avoid product discrimination or negative incentives.
5. Recycled content targets per application/sector: such targets are critical to incentivise recycling, drive investment, and accelerate the circular economy. These targets must be carefully set in order to be achievable: there must be enough available recycled material, which can be more difficult for product with a long life, for example.
6. Mechanical recycling: everything that can be mechanically recycled should be mechanically recycled and mechanical recycling should be prioritised. Advanced recycling technologies such as chemical recycling should complement mechanical recycling where necessary.
7. Improvements to waste management processes including collection and sorting.

⁶ See for example: [CEN - CEN/TC 134 \(cencenelec.eu\)](https://www.cencenelec.eu/), [CEN - CEN/TC 261 \(cencenelec.eu\)](https://www.cencenelec.eu/), [CEN - CEN/TC 261 \(cencenelec.eu\)](https://www.cencenelec.eu/).

8. Adapting to regional specificities: Even with global objectives and measures, value chains need to be managed locally. This is to guarantee that Extended Producer Responsibility can work smoothly, with traceability, control of the recycling loops, and connecting all the value chain actors. This also means that regional circumstances and specific needs can be taken into consideration.

Annex I of this document presents VinylPlus' detailed comments on the revised draft text of the international legally binding instrument on plastic pollution, including in the marine environment⁷.

About VinylPlus®

VinylPlus is the European PVC industry's commitment to sustainable development. Through VinylPlus, the European PVC industry is creating a long-term sustainability framework for the entire PVC value chain, improving PVC products' sustainability and circularity and their contribution to a sustainable society. It covers the EU-27, the UK, Norway, and Switzerland. VinylPlus represents around 200 companies of PVC resin and additives producers and converters and coordinates a network of about 150 recyclers. Since 2000, VinylPlus has invested more than €120 million in sustainability in Europe.

About Recovinyl®

Recovinyl aims to consolidate and increase the steady supply of post-consumer and post-industrial PVC waste being recycled in Europe by promoting a demand for recycled PVC material from the converting industry. With an established European network of more than 150 companies operating in over 15 EU member states as well as the UK, Norway and Switzerland, Recovinyl monitors, verifies and reports European PVC recycling tonnages and the use of recycled PVC in Europe.

Contact details of VinylPlus® delegates to INC-4

- Charlotte Röber, Managing Director, VinylPlus
- Vincent Stone, Senior Technical and Environmental Affairs Manager
- Ingrid Verschueren, General Manager, Recovinyl

⁷ [RevisedZeroDraftText.pdf \(unep.org\)](#)

ANNEX 1

DETAILED COMMENTS ON THE OPTIONS OUTLINED IN THE ZERO DRAFT

Title	Comments
Part II	
1. Primary plastic polymers	<p>VinylPlus agrees with taking measures to “prevent and mitigate the potential for adverse impacts on human health [and][or] the environment from the production of primary plastic polymers [and secondary plastics], including their feedstocks and precursors [to manage production and consumption of plastics through product design and environmentally sound waste management, including through resource efficiency and circular economy approach” (‘Option1).</p> <p>We disagree with the proposed reduction targets (Sub-option1 and 2). Such measures will have severe unintended socio-economic consequences, particularly on lower-income families in the Global South, who will potentially have reduced access to critical plastic products used in construction (such as pipes, cables, and windows), transportation and healthcare. There are several hundred thousand companies globally which depend on the supply of plastic resins to make the products on which their livelihood is based, and which bring major benefits to society (including meeting of the UN SDGs). Many of these companies are SMEs, and their ability to manufacture products and innovate will be negatively impacted by such measures.</p> <p>We support measures to increase the production, supply, utilization, and demand of secondary plastics and circular polymers (Sub option 2OP3 ter). We believe design for recycling, recycled content targets, and extended producer responsibility should be included in such measures.</p>
2. Chemicals and polymers of concern	<p>VinylPlus believes that decisions to restrict chemicals of concern are best left to national/regional chemical management systems, complemented by global policies such as the Stockholm Convention, the Global Framework for Chemicals, etc.</p> <p>For polymers, we support an application-based approach, rather than negative lists. An application-based approach can better account for local circumstances and capabilities. Such an approach should be science-based and could use a decision tree, as proposed by Plastics Europe.</p>
3. Problematic and avoidable plastic products, including short-lived and single-use	<p>VinylPlus believes that a negative list of problematic plastics will be counterproductive. Listing some polymers as “problematic” even though they are used in applications where they are critical to society and</p>

plastic products and intentionally added microplastics	adequately managed throughout the life cycle will be detrimental, and vice versa, it would be an issue to generically label polymers as “not problematic” even when a specific application causes significant issues that are not being managed. Instead, we support an application-based approach. Such an approach should identify challenges linked to specific applications and propose a way to tackle them.
5. Product design, composition and performance	VinylPlus believes that design for recycling is an essential enabler of circularity. We support: <ul style="list-style-type: none"> - On point a): option 2 - On point b): option 4 - On point c): option 4 - On point d): option 3/ 3bis
6. Non-plastic substitutes	VinylPlus remarks that it is crucial that alternatives developed are assessed to the same degree as plastics over their whole lifecycle to avoid regrettable substitution.
7. Extended producer responsibility	VinylPlus supports Extended Producer Responsibility, especially option 2. We support such schemes provided they are carefully thought through to incentivise good waste management, promote value chain and consumer responsibility with appropriate redistribution of funds and avoid product discrimination or negative incentives.
8. Emissions and release of plastic throughout its lifecycle	VinylPlus supports minimising emissions and release of plastics throughout their lifecycle. We believe voluntary approaches involving full value chains can help support this objective and complement the proposed binding measures. Operation Clean Sweep (OCS), which targets pellet loss, is another example of such approaches.
9. Waste management	VinylPlus supports effective measures for waste management. We believe voluntary approaches involving full value chains can help meet this objective and complement the proposed binding measures. For PVC in Europe, voluntary industry recycling targets, as well as projects to enhance recycling and reuse have boosted waste management.
10. Trade, b. transboundary movement of (non-hazardous) plastic waste	VinylPlus believes that the future ILBI should not overlap or contradict other global and regional policies. As a specific example, the Basel convention already established rules for the transboundary movement of plastic waste. In the EU, the Waste Shipment Regulation also sets complementary rules to the Basel convention. We strongly oppose provisions on transboundary movement of waste being added in this legal instrument, given that other binding instruments also cover them.
13. Transparency, tracking, monitoring and labelling	VinylPlus supports transparency, tracking, monitoring and labelling, and remarks that: <ul style="list-style-type: none"> - Harmonised guidelines would facilitate global collaboration. - Voluntary approaches can also include labelling. For instance, VinylPlus currently offers two sustainability certifications (VinylPlus Product Label⁸ and VinylPlus Supplier Certificates⁹)

⁸ [Home - VinylPlus® Product Label](#)

⁹ [VinylPlus Supplier Certificates - VinylPlus® Product Label](#)

	which help customers identify the most sustainable and high-performance PVC products.
Part IV	
/	<p>VinylPlus proposes to add a new part 8. b. on complementary voluntary approaches, establishing a framework for such approaches with guiding principles with the following wording:</p> <p>For the purpose of meeting the objectives of this instrument, industry can take action in the form of commitments. Such commitments should be monitored and respect the following principles:</p> <ol style="list-style-type: none"> 1. Industry commitments should seek to involve full value chains. 2. Targets and deadlines should be measurable and demonstrably contribute to achieving the objectives of the ILBI and/or national plans. 3. Targets should cover safe production, use, and waste management. 4. Transparency and accountability should be guaranteed through the involvement of external third parties in the monitoring and verification of progress and achievements (i.e. audit of monitoring reports, monitoring committee involving different stakeholders including regulators). 5. Commitments should include science-based and holistic solutions, underpinned by system thinking.