



IPEN Intervention on agenda item 3.b.i.c
Technical guidelines for the identification and environmentally sound management of plastic wastes and for their disposal

I speak on behalf of IPEN, a network of more than 600 civil society organizations in over 120 countries. Many of these countries see the devastating effects of the over-production of plastics and unmanageable amounts of plastic waste generated.

We appreciate the work done by the Small Intersessional Working Group on the update of the Technical Guidelines addressing plastic wastes and appreciate the guidance it provides about prevention and minimization of plastic wastes as the first and most important steps in the overall waste management hierarchy. We also welcome the included information about hazardous chemical additives to plastics.

However, we are very concerned about both some information included in the guidelines as well as some clear gaps where key pieces of information are missing. We would therefore like to highlight a few points at this meeting, in addition to our more detailed submissions in the working group.

First of all, we note the inclusion of incineration-based techniques such as so-called energy recovery, pyrolysis and refuse derived fuel without full descriptions of the toxic pollutants such as dioxins generated by these techniques, not to mention their carbon footprint. While some chemical additives are mentioned in the guidelines, there are still a range of hazardous additives missing such as UV-stabilizers with known endocrine disrupting properties. Also, the fact that these hazardous additives will carry over or even generate new toxic substances in the recycling process is not sufficiently clarified. These are all very important aspects to consider in the context of environmentally sound recycling and management of these wastes.

We are also very concerned about the lack of any guidance on cured resins or condensation products, and fluorinated polymers. While we believe they should be classified as hazardous waste and have submitted scientific evidence as to why, it is important to remember that they were listed in Annex IX *provided they are destined for recycling in an environmentally sound manner*. If no guidance is provided, anyone can claim ESM recycling and these highly hazardous wastes can be exported without any controls.

We look forward to discussing these and other issues related to the guidelines further.