

# Global Plastics Treaty: Initial Considerations for INC-2

“Intelligence without ambition is a bird without wings” – Salvador Dali

This briefing provides a first look – our initial considerations – on specific documents on items to be discussed at INC-2, in particular the rules of procedure (UNEP/PP/INC.2/3) and Options paper (UNEP/PP/INC.2/4). In line with the scenario note for INC-2 (UNEP/PP/INC.2/2), which envisions two contact groups, one on the substantive elements and another on implementation elements, our initial considerations on the Options paper are similarly divided.

For additional information on our views, please see our initial considerations on operative paragraphs three and four of Resolution 5/14, available [here](#)<sup>1</sup> in both English and Spanish, and our initial considerations for INC-1, available [here](#) in English.<sup>2</sup>

UNEP/PP/INC.2/3	Initial Considerations – Rules of Procedure
<b>Rules of Procedure</b>	
	<ul style="list-style-type: none"> <li>▪ <b>Rules of Procedure.</b> The draft Rules of Procedure were negotiated at the Open-Ended Working Group (OEWG), after which only bracketed text related to the voting rights for regional economic integration organisations (REIO) remained (Rule 37). If quick agreement cannot be reached on Rule 37, EIA recommends the INC move promptly to vote relying on the current rules applicable to the INC.</li> </ul>

UNEP/PP/INC.2/4 Initial Considerations – Substantive Elements	
<b>Overview</b>	
	<ul style="list-style-type: none"> <li>▪ <b>Bundling of Substantive Elements.</b> In order to facilitate their consideration, various core obligations and control measures identified under the substantive elements could be bundled into five main categories and discussed together: upstream, midstream, downstream and leakage as well as specific sources and sectoral strategies and cross-cutting issues such as health.</li> <li>▪ <b>Voluntary Approaches.</b> Voluntary approaches represent the status quo and do not merit discussion at INC-2.</li> </ul>
<b>Objectives</b>	
	<ul style="list-style-type: none"> <li>▪ <b>Objectives in the Plural.</b> EIA believes that the new instrument should have multiple, complementary objectives, which should include formulations of ending plastic pollution, protecting human health and the environment, achieving sustainable production and consumption of plastics and promoting a safe circular economy for plastics.</li> <li>▪ <b>Open-Ended and Broad in Scope.</b> Negotiators should ensure the objectives are open-ended and broad in scope.</li> <li>▪ <b>Initial Exchange.</b> Following an initial exchange on objectives, the contact group should quickly move to – and spend the vast majority of its time on – core obligations and control measures.</li> </ul>
<b>Core Obligations and Control Measures</b>	
<b>Upstream</b>	<ul style="list-style-type: none"> <li>▪ <b>Core Obligations.</b> The Options paper identifies two core obligations focusing the upstream (polymers and chemicals) stage of the lifecycle of plastic, namely primary plastic polymers and polymers and chemicals of concern:               <ol style="list-style-type: none"> <li>1. Phase out and/or reducing the supply of, demand for and use of primary plastic polymers</li> <li>3. Banning, phasing out and/or reducing the production, consumption and use of chemicals and polymers of concern</li> </ol> </li> </ul>

- **Control Measures.** The Options paper thereafter identifies potential controls measures that, taken together, present a rather comprehensive approach for addressing this stage of the lifecycle, including:

**Targets** – Establish targets for reduction of production (*e.g.* global, nationally determined) – ¶10(a)

**Elimination** – Phase out chemicals and polymers of concern based on criteria – ¶12(a)(i)-(ii)

**Limits** – Establish limits on primary plastic polymer production (freeze and phase-down) – ¶10(b)(i)

**Tracking** – Develop inventories, baselines, types, volumes of polymers and chemicals – ¶10(b)(iii), ¶11(a), ¶12(b)(i)

**Transparency** – Ensure transparency (*e.g.* labelling, data sheets, databases) – ¶12(b)(ii)

**Licensing** – Establish licensing schemes for production, import and export – ¶10(b)(iv)

**Trade** – Establish import and export requirements on parties and non-parties – ¶10(b)(ii), ¶12(a)(ii)-(iii)

- **Complexity and Size.** The core obligations on primary plastic polymers and polymers and chemicals of concern are complementary: one reduces the complexity of the problem by eliminating polymers and chemicals of concern while the other reduces the size of the problem by reducing the primary plastic polymers we do use. Both support safe circular economy and resource efficiency, setting the stage for subsequent stages across the lifecycle.
- **Chemical Simplification.** EIA supports chemical simplification and urges negotiators to regulate groups of chemicals, where possible, as opposed to individual chemicals. Regulating groups of chemicals avoids the risk of regrettable substitutions implicit in regulating one chemical at a time. Negotiators should also consider how, in the absence of data on chemicals, to establish a general presumption against their use in plastics, in line with the precautionary principle.
- **Criteria.** Parties have suggested the adoption of criteria to guide the listing of polymers and chemicals of concern, *i.e.* toxic or hazardous, unrecyclable in an environmentally sound manner and where substitutes exist. EIA believes that, while such criteria could be considered during INC negotiations, it should not be included in the text of the new instrument or an annex but instead adopted via a CoP decision. In this way, the criteria is flexible and can be updated more easily.

	<ul style="list-style-type: none"> <li>▪ <b>Baseline, Freeze, Phase-Down.</b> It is well-accepted that production, consumption and use of primary plastic polymers have reached unsustainable levels, crossing planetary boundaries. EIA recommends negotiators first discuss how to structure an immediate freeze (and against what baseline) before turning to the mechanisms required to reduce production, consumption and use of primary plastic polymers to sustainable levels in the future, such as via decision by COP to update an annex.</li> <li>▪ <b>Intersessional Work.</b> Developing the framework to achieve the sustainable production and consumption of primary plastic polymers and identifying polymers and chemicals of concern to populate an initial annex should be two priorities for intersessional work for this contact group.</li> <li>▪ <b>Further Information.</b> Please see the EIA article in <i>Frontiers in Marine Science</i> for further information on designing a framework to achieve the sustainable production and consumption of primary plastic polymers, available <a href="#">here</a>.<sup>3</sup></li> </ul>
<p><b>Midstream</b></p>	<ul style="list-style-type: none"> <li>▪ <b>Core Obligations.</b> The Options paper identifies three possible core obligations focusing on the midstream (plastic products) stage of the lifecycle of plastic, namely problematic plastic products and packaging, eco-design and substitutes:             <ol style="list-style-type: none"> <li>2. Banning, phasing out and/or reducing the use of problematic and avoidable plastic products</li> <li>6. Fostering design for circularity</li> <li>8. Promoting the use of safe, sustainable alternatives and substitutes</li> </ol> </li> <li>▪ <b>Control Measures.</b> The Options paper thereafter identifies potential controls measures that, taken together, again present a rather comprehensive approach for addressing this stage of the lifecycle, including:             <ul style="list-style-type: none"> <li><b>Elimination</b> – Phase out problematic and avoidable plastic products – ¶11(b), ¶11(c)</li> <li><b>Eco-Criteria</b> – Establish eco-design criteria for other plastic products and packaging – ¶15(a), ¶15(b), ¶15(c)</li> </ul> </li> </ul>

**Recycled Content** – Introduce targets for minimum recycled content – ¶15(e)  
**Labelling** – Introduce labelling, transparency requirements, product passports – ¶15(d), ¶12(b)(ii)  
**Certification** – Establish committee and certification schemes for sustainable alternatives – ¶17(b)(i), ¶17(b)(ii)  
**Registry / Platform** – Establish a central data exchange registry / platform – ¶15(f), ¶17(a)(i)  
**Trade** – Import and export requirements on parties and non-parties – ¶11(d), ¶11(e)

- **Overall Approach.** The overall approach to plastic products and packaging is to eliminate (or significantly reduce) those plastic products and packaging that are problematic and avoidable while ensuring alternatives or substitutes are safe and sustainable. For plastic products and packaging not subject to elimination, they should be designed to promote a safe and non-toxic circular economy and protect human health.
- **Eco-Criteria.** A key function of the new instrument will be to adopt eco-criteria for plastic products and packaging, for listing in an annex or registry, that can be updated and supplemented over time. Eco-criteria can be general (*e.g.* durability, biodegradability, compostability, recyclability, reusability, circularity, safety) or product-specific (*e.g.* recycled content, packaging, agricultural products, types of fishing gear). In terms of products, the focus should initially be on priority products (*e.g.* those with high leakage rates or difficult to collect and recycle)
- **Whitelist.** A whitelist (positive list) allows only certain polymers and chemicals with all others deemed impermissible by default. A blacklist (negative list) explicitly disallows only certain polymers and chemicals with all others deemed permissible by default. Eco-criteria should follow a whitelist approach to avoid playing whack-a-mole.
- **Short-Lived vs Single-Use.** EIA supports the conceptualisation of “short-lived” plastic products as opposed to “single-use” plastic products when thinking about specific categories of problematic and avoidable plastic products, and urges against trying to define “problematic” and “avoidable” as this can be context-dependent.

	<ul style="list-style-type: none"> <li>▪ <b>Transparency.</b> Toxic chemicals create a major barrier to achieving true circularity for plastics and recycling of plastics as it currently exists is effectively downcycling with very few polymers able to be readily and functionally recycled for a same or similar use. The world needs only so many downcycled plastic park benches and fences. Plastic cannot be made circular if it is not safe when put back into use, which requires transparency across the value chain from cradle to grave (or cradle).</li> <li>▪ <b>Intersessional Work.</b> Developing the framework for adopting eco-design criteria for plastic products and packaging should be another priority for intersessional work for this contact group.</li> </ul>
<p><b>Downstream</b></p>	<ul style="list-style-type: none"> <li>▪ <b>Core Obligations.</b> The Options paper identifies three possible core obligations focusing on the downstream (waste) stage of the lifecycle of plastic, namely waste management, reduction/reuse/repair and just transition:             <ul style="list-style-type: none"> <li>5. Strengthening waste management</li> <li>7. Encouraging reduce, reuse and repair of plastic products and packaging</li> <li>11. Facilitating a just transition, including an inclusive transition of the informal waste sector</li> </ul> </li> <li>▪ <b>Control Measures.</b> The Options thereafter paper identifies potential controls measures that, taken together, also present a rather comprehensive approach for addressing this stage of the lifecycle, including:             <ul style="list-style-type: none"> <li><b>Targets</b> – Establish targets/indicators on reduction/reuse/repair/recycling – ¶14(a)(ii), ¶14(b)(iv), ¶14(d)(ii), ¶16(a)</li> <li><b>ESM</b> – Implement measures to ensure ESM – ¶14(c)(i)</li> <li><b>Waste Hierarchy</b> <ul style="list-style-type: none"> <li>- <b>Reduction</b> – Encourage reduction – ¶16(b)(ii), ¶16(b)(v)</li> <li>- <b>Reuse</b> – Encourage reuse – ¶16(b)(ii), ¶16(b)(v)</li> <li>- <b>Recycling</b> – Encourage recycling – ¶14(d)(i), ¶14(d)(iv)-(v)</li> <li>- <b>Recovery</b> – Prohibit specific recovery practices – ¶14(b)(ii)</li> <li>- <b>Disposal</b> – Prohibit specific disposal practices, including illegal dumping – ¶14(b)(ii)</li> </ul> </li> </ul> </li> </ul>

**EPR** – Require EPR and other producer obligations – ¶14(b)(v), ¶14(d)(iii), ¶14(d)(vi), ¶16(b)(iii), ¶16(b)(v)

**Guidelines** – Develop guidance on ESM and EPR – ¶14(a)(iii), ¶14(b)(iii), ¶14(d)(iii)(b), ¶16(b)(i)

**Waste Trade** – Various approaches on plastic waste trade – ¶14(b)(i), ¶14(c)(ii), ¶14(c)(ii), ¶14(c)(iv)

**Just Transition** – Various approaches towards ensuring a just transition – ¶20(a), ¶20(b), ¶20(c), ¶20(d), ¶20(e)

- **Waste Hierarchy.** EIA recommends strictly adhering to the waste hierarchy when promoting the environmentally sound management (ESM) of plastic waste, meaning practices such as chemical recycling, incineration, cement kilns, open burning, co-firing, co-processing and waste-to-energy should be prohibited except in narrowly defined circumstances. Likewise, reduction and reuse should be given priority over recycling.
- **Targets.** EIA strongly supports targets and indicators for prevention, separate collection and recycling – in addition to reuse and repair – accompanied by regular reporting obligations to monitor implementation.
- **Extended Producer Responsibility (EPR).** EPR is often raised as a critical tool to reduce the burden of plastic-waste management on local authorities. Negotiators should carefully consider the nature of an EPR obligation and how best to operationalise it within the new instrument. For example, Parties could be subject to an obligation to adopt national EPR schemes (or sub-national, where applicable) for certain plastic products and packaging in conformity with EPR guidelines adopted by COP. Negotiators should also exercise caution to avoid conceptualising EPR as exclusively about collection and recycling as EPR should also support and incentivise reduction and re-design.
- **Guidelines.** In addition to guidelines on ESM and EPR, EIA recommends that the new instrument empowers CoP to adopt other guidelines, including reuse and preparation for reuse. For example, guidelines on reuse could contain definitions, design standards, guidance for scaling of reuse infrastructure through incentives and investment, criteria for managed pool systems, collection rate targets and recognition of local and traditional reuse and refill systems. Guidelines on preparation for reuse could be adopted for different sectors and product categories, such as electronics, textiles,

	<p>agriculture and fisheries, providing guidance on take back, repair, cleaning and reusing products and components without additional reprocessing.</p> <ul style="list-style-type: none"> <li>▪ <b>Plastic Waste Trade.</b> EIA supports restrictions on the trade in plastic waste, in line with the principle of self-sufficiency, with a timeline for the general phase-out of plastic waste exports from developed to developing countries.</li> <li>▪ <b>Further Information.</b> Please see the EIA and DUH briefing on reuse for further information on the types of interventions available to encourage reuse, available <a href="#">here</a>.<sup>4</sup></li> </ul>
<p><b>Remediation</b></p>	<ul style="list-style-type: none"> <li>▪ <b>Core Obligations.</b> The Options paper identifies one core obligation related to plastic pollution in the environment (leakage) stage, namely addressing existing plastic pollution: <ul style="list-style-type: none"> <li>10. Addressing existing plastic pollution</li> </ul> </li> <li>▪ <b>Control Measures.</b> The Options paper thereafter identifies potential controls measures, including: <ul style="list-style-type: none"> <li><b>Strategies</b> – Develop strategies to remediate existing plastic pollution – ¶19(a)(ii)</li> <li><b>Remediation beyond national jurisdiction</b> – Remediation measures beyond national jurisdiction – ¶19(a)(i)</li> <li><b>Remediation of fishing gear</b> – Eliminate ghost fishing gear in cooperation with IMO and FAO – ¶19(b)(i)</li> <li><b>Remediation in specific contexts</b> – Conduct specific remediation activities (<i>e.g.</i> coasts, rivers, landfills, biodiversity hotspots) – ¶19(b)(ii)</li> <li><b>Criteria / Guidelines</b> – Develop criteria and guidelines on remediation – ¶19(b)(iii)</li> </ul> </li> <li>▪ <b>Existing and Future Plastic Pollution.</b> Core obligations and control measures on remediation should not be limited to plastic pollution existing at the time of adoption of the new instrument, but should set out an adaptive framework covering future plastic pollution, including large-scale plastic pollution events.</li> </ul>

	<ul style="list-style-type: none"> <li>▪ <b>Remediation Activities.</b> Identifying an indicative list of remediation activities to be undertaken would facilitate the conversation on remediation, in particular control measures and sources of funding. For example, the considerations involved in remediating fishing gear is different than that for soil, rivers and landfills.</li> <li>▪ <b>No Last Beach Clean-Up.</b> There is no last beach clean-up without meaningful and effective control measures at the upstream, midstream and downstream stages nor without strategies for specific sources and sectors.</li> </ul>
<p><b>Specific Sources and Sectoral Strategies</b></p>	<ul style="list-style-type: none"> <li>▪ <b>Core Obligations.</b> The Options paper identifies three possible core obligations focusing on sources and sectors contributing to plastic pollution, namely microplastics and other releases and emissions:             <ul style="list-style-type: none"> <li>4. Reducing microplastics</li> <li>9. Eliminating the release and emission of plastics to water, soil and air</li> <li>12. Protecting human health from the adverse effects of plastic pollution</li> </ul> </li> <li>▪ <b>Control Measures.</b> The Options paper thereafter identifies potential controls measures that, taken together, set out the contours of source- and sector-specific approaches, including:             <ul style="list-style-type: none"> <li><b>Sectoral Strategies</b> – Develop sectoral strategies and measures (<i>e.g.</i> agriculture, fishing, transport) – ¶18(a)</li> <li><b>Microplastics</b> <ul style="list-style-type: none"> <li>- <b>Intentional Use</b> – Ban, phase-out, reduce or control intentional use and releases – ¶13(a)(i), ¶13(a)(ii)</li> <li>- <b>Pellets</b> – Measures to avoid pellet loss during production, handling, transport and use – ¶13(b)(i)</li> <li>- <b>Wastewater</b> – Support innovative mechanisms for wastewater treatment – ¶13(b)(ii), ¶18(a)</li> <li>- <b>Guidelines</b> – Develop industry guidelines (<i>e.g.</i> washing, textiles, tyres, road paint) – ¶13(b)(iii)</li> </ul> </li> <li><b>Fishing Gear</b> – Set out measures to prevent loss of fishing gear – ¶18(d)</li> </ul> </li> </ul>

	<p><b>Industrial Controls</b> – Require best available technologies and prohibit dangerous practices – ¶18(b), ¶18(c)</p> <p><b>Human Health</b> – Evaluate risks and adverse effects of plastic pollution on human health – ¶21(a), ¶21(b)</p> <ul style="list-style-type: none"> <li>▪ <b>Dedicated Programmes of Work.</b> EIA encourages dedicated programmes of work to develop and implement comprehensive strategies for specific sources and sectors. For example, fishing gear will require multiple interventions far beyond those that can be taken by the International Maritime Organization (IMO) and UN Food and Agricultural Organization (FAO), implicating a broad range of stakeholders including fishing-gear producers, fishing and seafood companies, port authorities, local municipalities, recyclers, certification bodies and regional fishery bodies, among others. Other sources, such as microplastics from textiles and tyre dust, and sectors, such as agriculture and transport, also require their own dedicated programmes of work to develop and implement comprehensive strategies.</li> <li>▪ <b>Intersessional Work.</b> Identifying the framework for establishing dedicated programmes of work to reduce emissions and releases from specific sources and sectors should be another priority for intersessional work for this contact group.</li> <li>▪ <b>Further Information.</b> Please see the EIA briefing for further information on what a dedicated programme of work for fishing gear could cover, available <a href="#">here</a>.<sup>5</sup></li> </ul>
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UNEP/PP/INC.2/4	<b>Initial Considerations – Means of Implementation, Implementation Measures, Additional Matters</b>
<b>Means of Implementation</b>	
<b>Means of Implementation</b>	<ul style="list-style-type: none"> <li>▪ <b>Means of Implementation.</b> The Options paper falls far short of expectations on the means of implementation, in particular the section on financial assistance. For example, there is no discussion on the types of activities to be funded, despite being raised in multiple submissions, and only a brief mention of the financial mechanism(s). This contrasts with the rather extensive listing of innovative and other financing opportunities, which serves as a distraction and promotes problematic options, such</li> </ul>

as credit schemes, that have neither been proven to work nor will provide the necessary financial assistance to deliver the ambitions of the new instrument.

- **Activities to Be Funded.** EIA believes negotiators should focus first and foremost on the activities to be funded (*e.g.* enabling activities, agreed incremental costs) and the terms of that funding (*e.g.* grant, concessional) while also identifying other activities for which innovative and other financial opportunities should be explored. Following the identification of the activities to be funded, negotiators can then discuss the financial mechanism best suited for delivering them.
- **Enabling Activities.** EIA believes negotiators should first agree upon a set of enabling activities to be funded on a grant basis, ensuring a minimum baseline of activities across developing countries. Enabling activities can generally be placed into the following categories: (i) institutional strengthening; (ii) reporting and monitoring; (iii) capacity-building and training; (iv) policy development, including national action plans; and (v) pilot and demonstration projects. Given the fundamental importance of enabling activities to the success of the new instrument, these should only be on a grant, not concessional, basis. Following exchanges and alignment on enabling activities to be funded on a grant basis, the discussion should also cover the financial mechanism best positioned to deliver that funding – for further development during the intersessional period.
- **Incremental Costs.** Negotiators should then agree upon a set of agreed incremental costs to be funded on a grant basis, covering at least those related to compliance, while also identifying other incremental costs that should be on a concessional basis. Following exchanges and alignment on incremental costs to be funded on a grant basis, the discussion should also cover the financial mechanism best positioned to deliver that funding – for further development during the intersessional period.
- **Draft Decision for COP-1.** Given the importance of the financial aspects to the negotiated package, EIA believes that a draft decision on enabling activities and incremental costs should be negotiated alongside the text of the new instrument for adoption at CoP-1. This would ensure that the entirety of the negotiated package, including the financial aspects, is captured and clear. Examples of decisions on enabling activities and incremental costs can be found under the Montreal Protocol (available [here](#) on page 803)<sup>6</sup> and Minamata Convention (available [here](#)).<sup>7</sup>

- **Financial Mechanisms.** EIA believes that a dedicated multilateral fund established alongside the new instrument will be required to deliver new, additional, stable, accessible, adequate, timely and predictable financial assistance, in particular for enabling activities and agreed incremental costs of compliance, to be funded on a grant basis. This will allow the Parties to take a “country programme” approach toward ending plastic pollution – similar to that taken in the Multilateral Fund for the Implementation of the Montreal Protocol that is comprehensive in scope and tailored to national circumstances. For activities that fall outside of those funded by the dedicated multilateral fund, and for which funding is provided on a concessional basis, EIA believes an existing multilateral fund such as the Global Environment Facility (GEF) could be used.
- **Plastic Pollution Trust Fund.** EIA believes that a plastic pollution trust fund should be explored, one that would be replenished with private sector funding while operating under the authority of the Parties. However, the discussion on private sector funding should be separate from the discussion on funding from donor countries for enabling activities and incremental costs and should focus on providing supplemental funds to assist with funding projects, possibly those related to plastic-waste management or remediation.
- **Capacity-Building, Technical Assistance, Technology Transfer.** EIA believes that capacity-building, technical assistance and technology transfer on mutually agreed terms should not be discussed at length and, to the extent it is discussed, focus should be on differences to the approach taken in Article 14 of the Minamata Convention.
- **Intersessional Work.** Developing a shared understanding of the activities to be funded, upon what basis and the financial mechanisms for delivering the funding should be a priority for intersessional work for this contact group.
- **Further Information.** Please see the EIA briefing for further information on the activities to be funded and the different types of financial mechanisms, available [here](#).<sup>8</sup>

Implementation Measures	
<b>Implementation Measures</b>	<ul style="list-style-type: none"> <li>▪ <b>Implementation Measures.</b> Negotiators should avoid a prolonged discussions on implementation measures and instead focus on setting out the contours of the zero draft for national action plans, national reporting, compliance and periodic assessment, after which more meaningful negotiations on a specific framework can be had.</li> <li>▪ <b>National Action Plans.</b> Negotiators should avoid a prolonged conversation on national action plans, focusing instead on quickly agreeing to the obligation to develop and implement national action plans, subjecting them to common elements and minimum content (via an annex or guidelines), periodic review and update and independent evaluation.</li> <li>▪ <b>National Reporting.</b> Negotiators should ensure a robust and common national reporting framework, one that requires baselines and inventories, allows for monitoring of trends and facilitates implementation and compliance. To this end, national reporting should: (i) cover each stage of the lifecycle of plastic (upstream, midstream, downstream, leakage) and specific sources and sectors, designed to match the core obligations and control measures; (ii) be regular, i.e. annually or biennially; and (iii) be standardised, subject to common definitions, formats and methodologies adopted by the CoP.</li> <li>▪ <b>Compliance.</b> EIA recommends a facilitative rather than a strictly punitive approach towards compliance – though both non-punitive and punitive measures should available – focusing on implementation and compliance with the legally binding provisions. For this purpose, an implementation and compliance committee should be established, modelled on Article 15 of the Minamata Convention.</li> <li>▪ <b>Periodic Assessment.</b> Please see the EIA briefing on reporting and monitoring, available <a href="#">here</a>.<sup>9</sup></li> </ul>
Additional Matters	
<b>Additional Matters</b>	<ul style="list-style-type: none"> <li>▪ <b>Additional Matters.</b> Negotiators should avoid a prolonged discussions on additional matters.</li> </ul>

- **Awareness-Raising and Education.** EIA recommends that, following an initial exchange of views, awareness-raising and education should be tabled until the development of a zero-draft text based on the country submissions and INC-2 interventions, modelled on Article 18 of the Minamata Convention.
- **Exchange of Information.** EIA recommends that, following an initial exchange of views, exchange of information should be tabled until the development of a zero-draft text based on the country submissions and INC-2 interventions.
- **Research.** EIA recommends that, following an initial exchange of views, research should be tabled until the development of a zero-draft text based on the country submissions and INC-2 interventions.
- **Cooperation and Coordination.** EIA recommends that, following an initial exchange of views, cooperation and coordination should be tabled until the development of a zero-draft text based on the country submissions and INC-2 interventions.
- **Stakeholder Engagement.** EIA recommends that, following an initial exchange of views, stakeholder engagement should be tabled until the development of a zero-draft text based on the country submissions and INC-2 interventions.

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