

## Business Coalition for a Global Plastics Treaty comments on key elements of the ‘Non Paper 3.0’

### The Business Coalition appreciates

- The mentioning of a **full life cycle approach** in the draft preamble text, including managing plastic production and consumption at sustainable levels, while emphasising the critical role for circular design of plastic products
- The integration of either **sectoral or product-specific approaches** as part of many core provisions but **regrets the lack of a working structure** such as Dedicated Programmes of Work to further develop those
- The proposals on the need for **additional work on restrictions and phase outs, product design and Extended Producer Responsibility (EPR)** to be carried out in the interim period between the Diplomatic Conference and first Conference of the Parties
- The obligation for parties to collaborate on addressing **legacy pollution** and ensuring a **just transition**, highlighting the crucial role of promoting engagement of local communities, civil society, as well as the private sector, including workers in informal and cooperative settings.

### The Business Coalition calls out

- The missing alignment on global rules for **restrictions and phase outs** to avoid creating unnecessary trade barriers and implementation costs, ideally based on further work to be developed by a expert or subsidiary body to the treaty
- The lack of a core obligation for parties to cooperate on the development and implementation of **harmonised product design requirements** as an important area of convergence
- The omission of a strong provision for parties to promote **reuse and refill systems** as an effective means to reduce plastic pollution
- The lack of a clear definition of **Extended Producer Responsibility (EPR)**, together with binding recommendations for the adoption and implementation of effective and well designed **EPR systems**
- The lack of cooperation amongst parties in addressing **releases of microplastics** from the production, storage, transportation, use and end of life management stages
- The critical relevance of **effective decision making at the future Conferences of the Parties (COP)**, enabling the adoption of amendments to the agreement and/or potential annexes in cases when consensus cannot be achieved.

### The Business Coalition points INC members to

- The possibility to register **temporary exemptions** from restrictions and phase-outs agreed under the treaty, giving countries time and flexibility to prepare their implementation
- The importance of a provision addressing **sustainable levels of primary plastic polymer production** to continue discussions on potential elements and actions to achieve them, in line with [our support for the Bridge to Busan declaration](#)
- The lack of confidence on how the treaty would **support developing countries in the implementation of their obligations**, including through the establishment of a financial mechanism
- The need for more clarity and guidance on the **development and consultation of national plans** together with relevant stakeholders
- The relevance of the draft articles on **effectiveness evaluation, monitoring and exchange of information**, recalling the need for a **common framework on data collection** that integrates **corporate disclosures** on plastic-related risks, opportunities, impacts and dependencies.