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Initial considerations for global rules in the international legally binding instrument to end plastic pollution 对具有法律约束力的终止塑料污染国 际文书中全球规则的初步意见

Response to the call for written submissions, issued
by the INC secretariat on 9 December 2022

对政府间谈判委员会秘书处2022年12月9日发布的
书面意见征集通知的回应

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Date 日期	5th January 2023 2023年1月5日

Information regarding the submission:

关于本意见书的信息:

As part of the Ellen MacArthur Foundation's [engagement to support the development of an ambitious and effective UN plastics treaty](#), our aim is to (1) showcase the need for concrete objectives, global rules and obligations in the international legally binding instrument to end plastic pollution ("the instrument"), and (2) provide initial options and considerations on the nature of these rules and obligations.

艾伦·麦克阿瑟基金会[支持制定一项目标远大、行之有效的联合国塑料条约](#)，就此，我们的目标是：(1) 阐明在具有法律约束力的终止塑料污染国际文书（“文书”）中载列具体目标、全球规则和义务的必要性，(2) 就这些规则和性质的性质提出初步方案和意见。

This submission is not intended to be exhaustive. It looks at the call for submissions particularly through the lens of:

本意见书并非详尽无遗，而是主要通过以下角度回应书面意见征集通知：

- Plastic packaging, which is the single biggest plastic application and source of leakage. The plastic packaging sector creates around 40% of total plastic waste today and is projected to almost triple by 2060.¹
- 塑料包装。包装是塑料最大的应用领域，也是塑料污染的最主要来源。目前，塑料包装行业产生的废弃物约占全球塑料废弃物总量的40%左右，预计到2060年，全球塑料包装废弃物将增长近三倍¹。
- How learnings from existing industry efforts and voluntary initiatives can inform initial considerations and options for global rules and obligations in the instrument.
- 从现有的行业实践和自愿倡议中汲取的经验教训可为文书中全球规则和义务的初步意见和方案提供参考。

Further insights to inform other potential elements of the instrument will be shared at a later stage.

为文书其他潜在要素提供建议的意见将于之后发布。

This submission was written by Mael Arribas, Jocelyn Blériot, Garance Boullenger, Mark Buckley, Andrea Cantu, Xiaoting Chen, Sander Defruyt, Lenaïc Gravis, Marta Longhurst, Ambrogio Miserocchi, Rob Opsomer, Thais Vojvodic, Jo de Vries, and Carsten Wachholz.

本意见书由Mael Arribas、Jocelyn Blériot、Garance Boullenger、Mark Buckley、Andrea Cantu、Xiaoting Chen、Sander Defruyt、Lenaïc Gravis、Marta Longhurst、Ambrogio Miserocchi、Rob Opsomer、Thais Vojvodic、Jo de Vries和Carsten Wachholz撰写。

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¹ OECD (2022), [Global Plastics Outlook: Policy Scenarios to 2060](#), OECD Publishing

¹ 经合组织（2022年），《全球塑料展望：到2060年的政策情景》，经合组织出版社

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I. Substantive elements

I. 实质性要素

1. Objective(s)

1. 目标

The instrument must aim to successfully end plastic pollution, including in the marine

environment, through the adoption of a comprehensive circular economy approach for plastics.

文书的总体目标是通过实施全面的塑料循环经济终止塑料污染（包括海洋环境中的塑料污染）。

A global goal to end plastic pollution is needed that seeks to address the problem swiftly, while acknowledging that some more transformational changes in today's plastics economy will require time. In this context, we welcome that governments in the High Ambition Coalition support a global goal to end plastic pollution by 2040.²

需要树立终止塑料污染的全球目标，以寻求尽快解决这一问题。同时，还需认识到推动当今塑料经济实现更深入的转型变革仍需时日。据此，我们对雄心联盟成员国支持到2040年实现终止塑料污染的全球目标²表示欢迎。

A **comprehensive circular economy approach** across the whole plastics lifecycle is essential to achieve this. The latest scientific analysis shows that this approach is most effective in avoiding plastic pollution, while offering the best economic, employment, and climate outcomes.³

要实现这一目标，必须在塑料全生命周期中采用**全面的循环经济模式**。最新的科学分析表明，该模式在避免塑料污染方面最为有效，同时也能带来最佳的经济、就业和气候效益。³

Such an approach mirrors the systems change solution to plastic pollution outlined in the pre-INC1 document on plastics science prepared by UNEP,⁴ which sets out four strategic goals: 该模式在联合国环境署于政府间谈判委员会第一届会议前编制的关于塑料科学的文件⁴中也有所体现，该文件概述了解决塑料污染的系统变革方案，包含四个战略目标：

² [High Ambition Coalition to End Plastic Pollution](#)

² [终结塑料污染的雄心联盟](#)

³ International Resource Panel (2021): [Policy Options to Eliminate Additional Marine Plastic Litter by 2050 under the G20 Osaka Blue Ocean Vision](#)

³ 国际资源委员会(2021年): [在G20《大阪蓝色海洋愿景》框架下实现2050年海洋塑料垃圾零增长的政策备选方案](#)

⁴ [U NEP/PP/INC.1/7](#)

⁴ [UNEP/PP/INC.1/7](#)

1. Reduce the size of the problem **by eliminating and substituting problematic and unnecessary plastic items**, including hazardous additives.
1. 淘汰和替代有问题和不必要的塑料制品(包括有害添加物), 降低塑料污染的规模。
2. Ensure that **plastic products are designed to be circular** (reusable, recyclable, or compostable).
2. 塑料产品的循环设计(可重复使用、可回收或可堆肥)。
3. Close the loop of plastic in the economy by ensuring that **plastic products are circulated in practice** (reused, recycled, or composted).
3. 塑料产品在经济体系中实现循环使用(重复使用、回收或堆肥)。
4. **Manage plastic waste that cannot be reused or recycled** in an environmentally sound manner (including existing pollution).
4. 以无害环境的方式处置不可重复使用或回收的塑料废弃物(包括历史遗留塑料垃圾)。

In line with this approach, **we recommend that the instrument underpins the global goal of ending plastic pollution with concrete objectives** in the following critical areas:

根据上述目标, 我们建议文书在以下重点领域设定具体目标, 支持实现终止塑料污染的全愿景:

1. **REDUCTION of plastic production and use**, focusing on those plastics that have high leakage rates, are short-lived, and/or are made using fossil-based virgin resources, because:
1. 减少塑料的生产和使用, 重点关注泄露率高、短寿和化石基塑料, 原因如下:
 - The elimination and substitution of selected problematic plastic items (see [Appendix A](#) for more details) is a good starting point, but we need to go further. It is crucial to reduce the size of the problem by tackling overall (virgin) plastics production and consumption.
从淘汰和替代部分有问题的塑料制品(详见[附录A所列清单](#))开始, 迈出塑料污染治理的第一步, 但仍需加快步伐。减少整体(原生)塑料的生产和消费对降低塑料污染规模至关重要。
 - Achieving at least an 80% reduction of plastic pollution by 2040 requires a 47% reduction and substitution of plastics, according to the most comprehensive scenario modelling to date.⁵
 - 根据迄今最全面的情景模拟结果, 若要在2040年前将塑料污染规模降低80%以上, 共计需要减少和替代47%的塑料⁵。
 - To remain within the industry's carbon budget for limiting global warming to 1.5°C, a 75% reduction of plastic consumption per person would be required by 2050, as recent modelling suggests.⁶
 - 一项近期的研究显示, 若要使塑料产业的碳预算满足全球升温限制在1.5°C以内的总目标, 则人均塑料消费量到2050年需要减少75%。⁶
 - Reduction is essential to close the collection and recycling infrastructure gap. The latter represents an enormous challenge even with today's volumes, let alone with continued business-as-usual growth.
 - 减量措施对于减轻收集和再生基础设施的负载至关重要。即便以目前废弃物产生的规模来看, 相关基础设施建设不足已成为一个巨大的挑战, 更遑论在继续照常增长的情况下。
2. **CIRCULATION of plastic items that cannot be eliminated**, keeping them in the economy at their highest value, including:
2. 循环使用无法淘汰的塑料制品, 使其在经济体系中保持最大价值, 要点如下:
 - Design. This determines whether a plastic item can be cost-effectively collected, reused, and recycled. In countries with an active informal sector, it significantly

influences the economic incentive for waste pickers to pick up an item.

- 设计。设计决定了塑料制品的收集、重复使用和再生是否具有成本效益。在非正规回收体系活跃的国家，设计极大地影响了拾荒者捡拾的积极性。
- Infrastructure. For plastic to be circulated in practice and at scale, systems for collection, sorting, reuse, recycling, and composting are also key.
- 基础设施。要使塑料在实践中大规模循环使用，收集、分选、重复使用、再生和堆肥系统也很重要。
- Establishing requirements on both design and systems for circulation of plastics has the potential to significantly reduce their leakage rate (see Appendices [B](#) and [C](#) for more details).
- 为塑料的设计和循环使用系统制定要求，有望显著降低塑料泄露率（详见附录[B](#)和附录[C](#)）。

3. PREVENTION and REMEDIATION of remaining hard-to-abate micro- and macro-plastic leakage into the environment, including existing pollution.

3. 预防和清理其他难以消除的微塑料和大塑料泄露（包括历史遗留污染）：

- While not the focus of this submission, the instrument should also tackle remaining hard-to-abate leakage that cannot be prevented via direct elimination, substitution, or circulation of plastics.
- 文书还应解决无法通过直接淘汰、替代或循环使用等方式来防止的，其他的塑料污染泄露源。虽然这并非本意见书的关注重点。

⁵ Pew Charitable Trusts and SYSTEMIQ (2020): [Breaking the Plastic Wave](#): A comprehensive assessment of pathways towards stopping ocean plastic pollution

⁵ 皮尤慈善信托基金会和SYSTEMIQ (2020年): [《力挽狂澜：破除海洋塑料污染》](#)

⁶ Eunomia (2022): [Is Net Zero Enough for the Materials Production Sector?](#)

⁶ Eunomia (2022年): [对材料生产行业来说，净零是否足够？](#)

These three objectives for the Treaty are also elaborated in a separate pre-INC2 submission by the [Business Coalition for a Global Plastics Treaty](#).

[全球塑料条约商业联盟（Business Coalition for a Global Plastics Treaty）](#)在政府间谈判委员会第二次会议前提交的文件中也阐述了这三项目标。

As part of the [New Plastics Economy Global Commitment](#) and [Plastics Pact network](#), the vision of a circular economy for plastics has been endorsed by over 1,000 signatories including 50 governments and businesses representing over 20% of the global plastic packaging market.

作为[新塑料经济全球承诺（New Plastics Economy Global Commitment）](#)和[塑料公约网络（Plastics Pact Network）](#)的一部分，塑料循环经济的愿景已得到千余个签署方的认可，其中包括50个政府，以及在全球塑料包装市场中占有率合计达20%以上的企业。

2. Core obligations and control measures

2. 核心义务与控制措施

Why global rules are essential⁷

全球规则的必要性⁷

1. Voluntary efforts are necessary but not enough. Voluntary initiatives play a vital role in pioneering solutions and demonstrating what is possible at scale. However, these efforts will by themselves never be enough to eliminate plastic waste and pollution. For example, four years after its launch, the New Plastics Economy [Global Commitment](#), a leading voluntary initiative, represents over 20% of the plastic packaging market. This is a significant proportion of the sector, but this also means 80% of the industry is still not involved and unlikely to act at the scale and pace required.

1. 自愿行动必不可少，但仍不足够。自愿举措在开创解决方案，以及证明哪些方案可以大规模推广方面发挥重要作用。然而，这些行动不足以消除塑料废弃物和污染。例如，作为一个领先的自愿倡议，新塑料经济[全球承诺](#)在发起四年后，其签署方在全球塑料包装市场的占有率超过20%。虽然这一比例相当大，但这也意味着该行业仍有80%的成员未参与其中，也不太可能以必要的规模和速度采取行动。

2. Global rules provide the best prospect for rapid and systemic impact. All countries acting in concert to prohibit certain problematic plastics and to unlock a circular economy for plastics at a global scale will have a profound and lasting impact. Applying binding, time-bound, and measurable obligations that all Parties to the legally binding instrument will be required to implement in their national jurisdictions will have a decisive impact, compared to waiting on a range of voluntary and often disparate actions taken at a national level.

2. 全球规则为产生迅速、系统性的影响提供了最佳前景。所有国家一致行动，在全球范围内禁用某些有问题的塑料并推行塑料循环经济，这将产生深远持久的影响。相比等待各国采取一系列自愿且往往各不相同的行动，具有法律约束力的文书可要求所有缔约方在其国家管辖范围内履行有约束力、有时限、可衡量的义务，并将产生决定性影响。

3. Other multilateral environmental agreements have successfully established effective global rules. Examples include the Montreal Protocol on ozone-depleting substances (1987), the Stockholm Convention on persistent organic pollutants (POPs) (2004), and the Minamata Convention on mercury pollution (2017). These agreements have been recognised for their successful impact.

3. 其他多边环境协议已经成功确立行之有效的全球规则。例如，《关于消耗臭氧层物质的蒙特利尔议定书》（1987年）、《关于持久性有机污染物的斯德哥尔摩公约》（2004年），以及《关于汞的水俣公约》（2017年）。这些协议因产生了积极影响而广受认可。

4. Governments, especially in developing economies, will benefit from global rules. Global rules would provide clarity and reduce implementation costs. The aggregate cost for every country to individually develop their own solutions would be significantly higher than if these activities were undertaken jointly. Developing a set of harmonised standards and requirements on issues such as product design, prohibited additives, or accepted polymers, would also allow joint actions without facing the risk of investors or businesses moving their operations elsewhere.

4. 各国政府(尤其是发展中经济体的政府)将受益于全球规则。全球规则清晰明确,可降低执行成本。每个国家单独制定解决方案的总成本大大高于联合开展行动的总成本。此外,就产品设计、违禁添加剂或允许使用的聚合物等议题制定一套统一的标准和要求,将使各国能够开展联合行动,同时无需面临投资者或企业将业务转移到他处的风险。

5. Businesses and investors will benefit from harmonised policy efforts. Global rules that avoid a patchwork of disconnected national solutions can help create a level playing field for an industry operating on a global scale. Because of the international nature of plastics products, packaging and waste trade, businesses will struggle to comply with diverging rules coming from 193 countries around the world. By harmonising regulatory standards, defining common metrics and methodologies, and supporting innovation and infrastructure development, global rules on plastic pollution can help drive the transition to a circular economy for plastics at speed and scale and with lower costs of compliance for the industry.⁸

5. 企业和投资者将从统一协调的政策措施中受益。全球规则避免了各国各自为政的解决方案带来的混乱,有助于为在全球范围运作的行业营造公平的竞争环境。由于塑料产品、包装和废弃物贸易的国际性,企业很难遵守全球193个国家制定的不同规则。通过统一监管标准、确立通用的指标和方法及支持创新和基础设施建设,全球塑料污染规则能够推动快速、全面地向塑料循环经济转型,并降低塑料行业的履约成本。⁸

⁷ Adapted and extended from WWF (2022): [Towards a treaty to end plastic pollution. Global rules to solve a global problem](#)

⁷ 世界自然基金会(2022年):《[推动达成塑料污染条约:全球规则解决全球问题](#)》,经改编和扩充

Examples of potential global rules for consideration in the Treaty

供条约参考的全球规则示例

The instrument needs to address as a priority those plastics that have high leakage rates or are short-lived products that become waste quickly, including packaging. Such prioritisation is critical in order to develop effective core obligations and control measures. While focusing on those priority areas first, the Treaty should also provide the option to cover additional sectors or plastic applications over time, without having to amend the legal text of the instrument.

文书需要优先关注泄露率高或那些很快成为废弃物的短寿塑料制品，包括塑料包装。这种优先考量对于制定有效的核心义务和控制措施至关重要。在重点关注这些优先领域的同时，条约还应提供备选方案，以便将来逐步涵盖其他行业或塑料应用时无需修改文书法律文本。

Based on our expertise of working with businesses in the packaging value chain, we believe there are various measures that have already gained broad support and that collectively will have a very significant impact. Therefore, **we suggest that the following areas should be prioritised for the consideration and development of potential obligations and control measures in a global treaty.** 根据我们与包装价值链上企业合作的经验，我们认为已有诸多措施得到广泛支持，且这些措施将产生十分显著的综合影响。因此，**我们建议在审议和制定全球条约中的义务和控制措施时，应优先关注以下领域。**

Non-exhaustive list of potential global rules in an international legally binding instrument to end plastics pollution 一项具有法律约束力的旨在终结塑料污染的国际文书中 潜在全球规则的非详尽清单	
REDUCTION 减量	<ul style="list-style-type: none"> ● Elimination of problematic plastics. This should include definitions, criteria, and an initial list of polymers, additives and formats to be eliminated, with an ultimate aim to phase out all problematic plastic materials and applications, including the avoidance of hazardous chemicals. (see Appendix A for more detail) ● 淘汰使用有问题的塑料。这一规则应包含定义、标准，以及需要淘汰的聚合物、添加剂和形式的初步清单，最终目标是逐步淘汰所有有问题的塑料材料和应用，包括避免使用危险化学品。（详见附录A） ● Limiting or reducing the total volume of plastics put on the market. There are still important questions to be resolved around how to best do this, including whether to focus on per capita or aggregate, virgin or all plastic, production or consumption, by sector or total, and how to consider different stages of development. Yet what's clear is that, based on the best available evidence,^{9,10} specific reduction targets and monitoring of volumes of different types of plastics put on the market need to be part of the solution. ● 限制或减少市场上的塑料总量。就如何最好地实现这一点，仍有一些重要问题需要解决，包括关注人均还是总量、原生塑料还是所有塑料、生产还是消费、按行业还是总体，以及不同发展阶段应如何考量。然而，根据现有的最佳证据，^{9,10} 可以明确的是，解决方案必须包括制定具体的减量目标，并对市场上不同类型的塑料数量进行监测。

CIRCULATION 循环使用	<ul style="list-style-type: none"> ● All plastic packaging to be designed for a circular economy by a certain target date. To be reusable, recyclable, or compostable in practice and at scale, harmonisation of packaging definitions, criteria, and design requirements are needed. (See Appendix B for more detail.) ● 在特定的目标日期前，实现所有塑料包装都必须为循环经济而设计。为了实现包装在实践中大规模重复使用、再生或堆肥，需要统一包装的定义、标准和设计要求。（详见附录B） ● Promoting reuse and refill, including mandatory obligations for applications where reuse is proven to work at scale (e.g. beverages, B2B packaging, home and personal care). ● 推广重复使用和重复灌装，包括要求已证实可大规模推行重复使用的应用领域（如饮料、B2B包装、家庭和个人护理）将其作为强制性义务。 ● Introducing minimum recycled content from post-consumer plastic waste, differentiated by application and geography where relevant. ● 制定消费后塑料废弃物的最低回收物含量要求，可视情况按应用类型和地理区域做相应区分。
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⁸ WWF, Ellen MacArthur Foundation, and Boston Consulting Group (2020): [The Business Case for a UN Treaty on Plastic Pollution](#)

⁸ 世界自然基金会、艾伦·麦克阿瑟基金会和波士顿咨询集团 (2020年): [《联合国塑料污染条约商业案例》](#)

⁹ Pew Charitable Trusts and SYSTEMIQ (2020): [Breaking the Plastic Wave](#): A comprehensive assessment of pathways towards stopping ocean plastic pollution

⁹ 皮尤慈善信托基金会和SYSTEMIQ (2020年): [《力挽狂澜：破除海洋塑料污染》](#)

¹⁰ Eunomia (2022): [Is Net Zero Enough for the Materials Production Sector?](#)

¹⁰ Eunomia (2022年): [对材料生产行业来说，净零是否足够？](#)

CIRCULATION Continued 循环使用 (续)	<ul style="list-style-type: none"> • Introducing mandatory Extended Producer Responsibility (EPR) schemes and ensuring their effectiveness. EPR legislation is essential to fund the necessary infrastructure and systems, guide design decisions, establish consistent recycling definitions and standards, build sound and inclusive waste management systems, and to make the economics work for plastics recycling. (See Appendix C for more detail.) • 引入生产者责任延伸(EPR)制度并确保得到有效实施。EPR立法对于为必要的基础设施和系统提供资金、指导设计决策、确立统一的回收定义和标准、建立健全包容的废弃物管理系统, 以及使塑料回收产生经济效益至关重要。(详见附录C)
PREVENTION and REMEDIATION 预防 and 清理	<p>This is not the focus of this submission, but we consider the development of global rules relevant also to tackling the remaining hard-to-abate micro- and macro-plastic leakage into the environment that cannot be prevented via direct elimination, substitution, or circulation of plastics.</p> <p>这部分并非本意见书的关注重点, 但我们认为制定全球规则也关乎应对无法通过直接消除、取代或循环使用塑料来防止的其他难以消除的微塑料和大塑料泄露问题。</p>

II. Implementation elements

II. 执行要素

This is not the focus of this submission but we will provide further input related to implementation measures and/or means of implementation for the international legally binding instrument to end plastic pollution at a later stage.

本部分并非本意见书的关注重点, 但我们将在今后提供与具有法律约束力的终止塑料污染国际文书中执行措施和/或执行手段相关的进一步意见。

III. Additional input

III. 其他意见

Definitions, measurement, and reporting

定义、衡量标准和信息披露

Robust national reporting, with common definitions and metrics, will be vital for the effectiveness of the Treaty. Effective national reporting can generate an evidence base of consistent, reliable, and high-quality information to set baselines, monitor progress against the instrument's objectives, and strengthen accountability and compliance.¹¹

遵循通用定义和指标的强有力的国家报告对于条约的成效至关重要。有效的国家报告可以形成由一致、可靠和优质信息构成的证据库, 监测文书具体目标的进展, 并加强问责和履约机制。¹¹

There are existing voluntary corporate reporting efforts to learn from, many of them are aligned with and complementary to each other. They include:

现有的自愿企业报告值得借鉴，其中许多报告是相互协调和互为补充的，包括：

- **The New Plastics Economy Global Commitment**, led by the Ellen MacArthur Foundation and UN Environment Programme, was launched in 2018. It has developed harmonised definitions and metrics to support the collection and reporting of data on plastic and plastic packaging at the individual company and government level. It is backed by more than 500 organisations, and businesses representing over 20% of the world's plastic packaging have used this reporting framework for four years. Industry-tested and approved reporting metrics include, among others, the volume and share of virgin (fossil-fuel) plastics, the volume and share of 'reusable', 'recyclable', and 'compostable' plastics, as well as post-consumer recycled content.¹² By making all this data [publicly available](#), the Global Commitment has created unprecedented transparency on what progress towards a circular economy for plastics is made by whom and where it is still missing.
- 新塑料经济全球承诺。该倡议由艾伦·麦克阿瑟基金会与联合国环境规划署于2018年联合发起。该倡议制定了统一的定义和指标，以支持在各个企业和政府层面收集并报告塑料和塑料包装的数据。该倡议已得到逾500个组织的支持，占全球塑料包装市场20%以上的企业使用这一报告框架已有四年。经行业验证和认可的报告指标包括原生（化石燃料）塑料的数量和占比，“可重复使用”、“可回收”和“可堆肥”塑料的数量和占比，以及消费后塑料回收物含量。¹² 通过[公开](#)这些数据，“全球承诺”提供了前所未有的透明度，展现了哪些企业和政府在塑料循环经济方面取得了哪些进展，以及哪些方面尚有欠缺。

¹¹ UNEP/PP/INC.1.7 [Plastics Science](#) (September 2022), para 13

¹¹ UNEP/PP/INC.1.7 [塑料科学](#) (2022年9月)，第13段

¹² [New Plastics Economy Global Commitment - Commitments, vision, and definitions: Appendix II: common definitions](#)

¹² 《新塑料经济全球承诺——承诺、愿景和定义》；附录II：通用定义

- **The partnership between CDP, The Pew Charitable Trusts, Minderoo Foundation, and the Ellen MacArthur Foundation** [announced in September 2022](#) (further elaborated in a separate pre-INC2 submission by the four organisations). This partnership is expanding CDP's global environmental disclosure system to include plastics reporting, building on some of the key Global Commitment metrics. It leverages CDP's leading reporting platform (over 18,000 companies, worth 64% of global market capitalisation, are already disclosing through CDP) to expand plastics reporting to thousands more businesses. With expertise from the Ellen MacArthur Foundation and committed multi-year funding from Pew and Minderoo, CDP's objective is to build a plastics disclosure mechanism that is comparable to that already in place for climate change.¹³ Questions and metrics on plastics will be added into CDP's annual disclosure questionnaires, beginning with a pilot in 2023. The full details of CDP's first year of plastics disclosure, including which companies will be requested to disclose initially, will be released soon, prior to the launch of the disclosure platform in April 2023.
- **CDP、皮尤慈善信托基金会 (The Pew Charitable Trusts)、明德鲁基金会 (Minderoo Foundation) 和艾伦·麦克阿瑟基金会** [于2022年9月宣布](#)建立的伙伴关系(这四个组织在政府间谈判委员会第二次会议前提交的文件中进一步阐述了该伙伴关系)。该伙伴关系将扩大CDP的全球环境信息披露体系,使之在一些关键全球承诺指标的基础上纳入塑料报告。该伙伴关系利用CDP领先的报告平台(目前通过CDP披露信息的企业超过18000家,占全球市值的64%),将塑料报告推广至额外的数千家企业。借助艾伦·麦克阿瑟基金会的专业知识以及皮尤慈善信托基金会和明德鲁基金会承付的多年资助,CDP的目标是建立一个与现有气候变化信息披露机制相当的塑料信息披露机制。¹³ CDP的年度披露问卷中将增加与塑料相关的问题和指标,于2023年开始试点。披露平台将于2023年4月上线,在此之前,CDP第一年塑料信息披露的全部细节(包括最初要求哪些公司进行披露)将于近期公布。
- **WWF's ReSource: [Plastic Footprint Tracker](#)** measures the plastic footprints and waste mitigation efforts of corporate users, including members of the U.S. Plastics Pact¹⁴ and Canada Plastics Pact.¹⁵ It aims to align with the New Plastics Economy Global Commitment when it comes to metrics measuring what plastic packaging companies are putting on the market, while adding additional metrics on the 'fate' of the packaging after its use (i.e. is it reused, recycled, incinerated, landfilled, or leaked into the environment).
- 世界自然基金会的ReSource: [塑料足迹追踪工具 \(Plastic Footprint Tracker\)](#) 衡量企业用户(包括美国塑料协议¹⁴和加拿大塑料协议¹⁵的成员)的塑料足迹和减少废弃物的行动,力求在塑料包装企业的市场投放指标方面与新塑料经济全球承诺保持一致,同时增加关于包装使用后的其他指标(即重复使用、回收、焚烧、填埋,或泄露至环境)。

Government reporting as part of the instrument should build on and, where relevant, align with these existing voluntary efforts. It would be useful for all national governments to report annually and in a harmonised way on key metrics relevant to track progress towards the instrument's objectives and to create transparency on the global plastics system overall. Such metrics could include plastics produced, exported, used, collected, recycled, incinerated, landfilled, and leaked in the environment, by plastic type and application.

文书中关于政府报告的规定应以这些现有的自愿报告为基础,并视情况与其保持一致。各国政府应每年以统一的方式报告有助于追踪文书目标进展的关键指标,提高全球塑料体系的整体透明度。这些指标可包括按类型和用途划分的塑料产量、出口量、使用量、收集量、回收量、焚烧量、填埋量和泄漏量。

Ideally, governmental reporting under a future UN Plastics Treaty would be aligned with voluntary (or mandatory) corporate disclosures as needed, allowing them to feed into each other. To do this, alignment on key definitions, metrics, and methodologies will be required.

理想的情况是,根据未来的联合国塑料条约,政府报告将根据需要与企业自愿(或强制)披露的信息协调一致,使二者能够相互补充。为此,必须统一关键定义、指标和方法。

¹³ [CDP Plastic](#) and CDP (2022): [CDP expands global environmental disclosure system to help tackle plastic pollution crisis](#)

¹³ CDP塑料和CDP (2022年): [CDP扩大全球环境信息披露体系, 助力解决塑料污染危机](#)

¹⁴ [U.S. Plastics Pact](#)

¹⁴ [美国塑料协议](#)

¹⁵ [Canada Plastics Pact](#)

¹⁵ [加拿大塑料协议](#)

Appendix A: Elimination of problematic plastic packaging

附录A： 淘汰有问题的塑料包装

Clear starting points and stakeholder alignment already exist

有明确的切入点，且各方达成基本一致

There is already significant alignment regarding the plastic materials, formats, and components most frequently identified as unnecessary or problematic. The following list of criteria is used by the Global Commitment signatories (a group of 500 signatories including businesses representing over 20% of the global plastic packaging market and 50 governments) and members of the Plastic Pacts network¹⁶ (national initiatives across five continents including in the Global South) to help identify problematic or unnecessary plastic packaging or plastic packaging components:

针对最常见的不必要或有问题的塑料材料、品类和成分已达成显著共识。“全球承诺”的签署方(超过500家, 其中包括占全球塑料包装市场份额20%以上的企业和50家各级政府)和塑料公约网络¹⁶(包括全球南方在内、横跨五大洲的国家倡议)的成员使用以下准则明确有问题或不必要的塑料包装或塑料包装组成部分:

1. It is not reusable, recyclable, or compostable in practice and at scale.
1. 在实践中无法实现规模化重复使用、回收或堆肥。
2. It contains, or its manufacturing requires, hazardous chemicals that pose a significant risk to human health or the environment (applying the precautionary principle).
2. 含有或制造过程需要使用对人类健康或环境构成重大风险的危险化学品(适用预防原则)。
3. It can be avoided (or replaced by a reuse model) while maintaining utility.
3. 可避免使用(或可被重复使用模式取代)但不影响正常功能。
4. It hinders or disrupts the recyclability or compostability of other items.
4. 妨碍或破坏其他物品的可回收性或可堆肥性。
5. It has a high likelihood of being littered or ending up in the natural environment.
5. 被丢弃或泄漏到自然环境的概率较高。

Additionally, members of the Consumer Goods Forum (CGF) have aligned on Golden Design Rules (GDRs) for packaging, including a largely overlapping list of ‘Problematic Elements’ to be eliminated from packaging. Below is a non-exhaustive table with plastics types and items most frequently identified* as unnecessary or problematic by relevant voluntary initiatives:

此外, 消费品论坛(CGF)成员单位就塑料的黄金设计原则(GDR)达成一致, 其中包括一个与上述准则高度一致的“包装问题成分”淘汰清单。下面的表格列出了相关自愿倡议中最常见的不必要或有问题的塑料类型和制品*(非详尽):

	Rationale quoted by selected stakeholders 部分利益相关方提出的观点	% of GC signatories^{17 **} 占全球承诺签署方百分比 ^{17 **}	No. of Pacts¹⁸ 所涉协议数量 ¹⁸	CGF GDR¹⁹
Materials/Additives 材料/添加剂				
ePS (Expanded Polystyrene) packaging ePS(发泡聚苯乙烯) 包装	CGF GDR/Kenya Pact : Too uncommon to make recycling economically viable. The material is rarely sorted from household waste and recycled. Most of the material is incinerated and landfilled. CGF GDR/肯尼亚塑料公约网络 : 回收不太可能具有经济效益。这种材料很难从生活垃圾中分选并回收, 大部分被焚烧和填埋。	80%	7	x
PVC (Polyvinyl chloride) packaging PVC(聚氯乙烯) 包装	CGF GDR/UK Plastics Pact/South Africa Pact : Not recyclable and acts as a contaminant if it enters the recycling system. Its presence negatively affects the quality of other recyclates. CGF GDR/英国塑料协议/南非塑料公约网络 : 不可回收, 若进入回收系统会成为污染物。这种材料的存在会对其他回收物的质量产生负面影响。	76%	9	x
Carbon black pigment 炭黑颜料	CGF GDR/French Plastics Pact : Undetectable in the sorting process when using Near Infra-Red (NIR) technology, which prevents it from being recycled. Most of the material is incinerated and landfilled. CGF GDR/法国塑料公约网络 : 使用近红外(NIR)技术分选时无法检测到这种材料, 故无法回收, 大部分被焚烧和填埋。	70%	5	x
PVDC (Polyvinylidene)	CGF GDR/Poland Pact : The presence of these materials	61%	4	x

¹⁶ Plastics Pacts that have published a list of problematic and unnecessary plastic types and items:

South Africa, United States, United Kingdom, Kenya, Chile, Portugal, Poland, France, and Canada

¹⁶ 已公布有问题和不必要的塑料类型和制品清单的塑料协议: 南非、美国、英国、肯尼亚、智利、葡萄牙、波兰、法国和加拿大

¹⁷ [Global Commitment Progress Report 2022](#)

¹⁷ 《2022年全球承诺进展报告》

¹⁸ [Plastics Pact Network page](#) (with the link for each Plastic Pact website)

¹⁸ [塑料公约网络页面](#) (包含各塑料协议网站链接)

¹⁹ [Consumer Goods Forum: Golden Design Rules](#)

¹⁹ [消费品论坛: 黄金设计规则](#)

	Rationale quoted by selected stakeholders 部分利益相关方引用的理由	% of GC signatories^{17 **} 全球承诺签署方占比 ^{17 **}	No. of Pacts¹⁸ 所涉公约数量 ¹⁸	CGF GDR¹⁹ 消费者论坛黄金设计原则 ¹⁹
Materials/Additives 材料/添加剂				
chloride, or polyvinylidene dichloride) PVDC (聚偏氯乙烯或聚偏二氯乙烯)	in packaging interferes with the recycling of other plastics, negatively affecting the quality of other recyclates. CGF GDR/波兰塑料公约网络 : 包装中存在这种材料会妨碍其他塑料的回收, 对其他回收物的质量产生负面影响。			
PS (Polystyrene) Packaging PS (聚苯乙烯) 包装	CGF GDR/UK Plastics Pact : Too uncommon to make recycling economically viable. The material is rarely sorted from household waste and recycled. Most of the material is incinerated and landfilled. CGF GDR/英国塑料公约网络 : 回收不太可能具有经济效益。这种材料很少从生活垃圾中分选并回收, 大部分被焚烧和填埋。	56%	8	x
Multilayer materials (multimaterial) 多层材料(多材料)	Portugal Pact : These are packages containing several layers of plastics, often of different and incompatible types. It is highly difficult to recycle. 葡萄牙塑料公约网络 : 此类包装包含多层塑料, 每层通常使用不同材质, 回收难度大。	44%	5	
PETg (Polyethylene terephthalate glycol) PETg (聚对苯二甲酸乙二醇酯)	CGF GDR/Kenya Pact/Poland Pact : Acts as a contaminant if present in the PET recycling stream, hindering the recyclability and value of PET materials. CGF GDR/肯尼亚协议/波兰塑料公约网络 : 在PET回收过程中为污染物, 影响PET材料的可回收性和回收价值。	43%	5	x
Oxo-degradable packaging 可氧化降解包装	CGF GDR/South Africa Pact/Kenya Pact : Fragments into microplastics, contributing to plastic pollution. Not suited for long-term reuse, recycling at scale, or composting. CGF GDR/南非公约/肯尼亚协议 : 易破碎变成微塑料, 造成塑料污染, 不适合长期重复使用、大规模回收或堆肥。	Not accounted*** 未统计***	7	x
Formats 形式				
Single-use plastic cutlery/serveware 一次性塑料餐具	South Africa Pact : High leakage into the environment and very unlikely to be recycled. 南非塑料公约网络 : 环境泄漏率高, 几乎不可能回收。	64%	5	
Single-use plastic straws 一次性塑料吸管	UK Plastics Pact/Kenya Pact/Portugal Pact : High leakage into the environment, their small size prevents them from being recycled. 英国/肯尼亚/葡萄牙塑料公约网络 : 环境泄漏率高, 因尺寸小而难以回收。	31%	5	
Single-use plastic stirrers 一次性塑料搅拌棒	Kenya Pact : High leakage into the environment, their small size prevents them from being recycled. 肯尼亚协议 : 环境泄露率高, 因尺寸小而难以回收。	Not accounted*** 未统计***	5	
Single-use cotton buds with plastic stems	UK Plastics Pact/Kenya Pact : High leakage into the environment.	Not accounted***	4	

一次性塑料棒棉签	英国塑料协议/肯尼亚塑料公约网络 ：环境泄漏率高。	未统计***		
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*At least 30% of GC signatories / at least 4 Plastics Pacts / complete list from GDR

*至少30%的全球承诺签署方/至少4个塑料协议/GDR的完整清单

**Percentage of GC signatories eliminating/reducing the category, out of the ones currently reporting having the category as part of their portfolio

**目前报告其业务涉及该类别的全球承诺签署方中，致力于淘汰/减少该类别的签署方占比

***Not accounted by industry members, but government signatories are reporting bans on these categories

***行业成员未统计，但政府签署方报告了对这些类别的禁令

In addition to the voluntary initiatives above, many governments have introduced legislation that feature single-use plastic bans, including, among many others, the [European Union](#), [Kenya](#), and [Chile](#).

除上述自愿倡议外，包括[欧盟](#)、[肯尼亚](#)和[智利在内的](#)许多政府已推出禁用一次性塑料的法规。

The Treaty must create common definitions and criteria for countries to phase out problematic plastic packaging

条约必须制定通用定义和标准，以便各国逐步淘汰有问题的塑料包装

The instrument should strengthen the current voluntary and/or fragmented efforts towards elimination of problematic plastic packaging by introducing harmonised regulatory standards and common definitions across markets.

为加强针对有问题的塑料包装的处理，文书应制定适用全球市场的统一监管标准和通用定义，以强化当前为淘汰这些包装做出的分散自愿性措施。

Voluntary efforts, while important to show what is possible and create alignment, quickly hit a ceiling in terms of the share of the market that signs up, and ultimately do not guarantee the elimination of problematic plastic packaging at global scale. Fragmented policies across countries are more costly for governments to separately develop and enforce, and for businesses to comply with.

尽管自愿性措施对展示可能方案和达成共识至关重要，但就签署方所占的市场份额来看，很快就会遭遇瓶颈，最终无法保证在全球范围内淘汰有问题的塑料包装。各国各自为政的政策，对政府来说，制定和执行的成本更高，对企业来说，遵守的成本也更高。

Therefore, building on the initial list of problematic plastic items identified above and turning it into a globally consistent regulatory approach towards phasing them out would be an important first step.

因此，在上述初步拟定的问题塑料制品清单的基础上制定全球一致的监管方法以逐步淘汰这些塑料制品，是必要的第一步。

The instrument should go beyond the voluntarily identified list of problematic items and more comprehensively address hazardous chemicals.

文书不应局限于自愿性举措所涉及的问题塑料制品清单，应更全面地解决危险化学品问题。

A large variety of different chemicals are used in plastic packaging. There is evidence that some of these chemicals have hazardous properties, and for other chemicals there is a lack of publicly available toxicity data, raising concerns about their potential impact on human health and/or the environment. Elimination efforts should aim to avoid hazardous chemicals to ensure that plastic packaging is safe to be made, used, reused, and recycled.

塑料包装中使用了多种不同的化学品。有证据表明，其中一些化学品具有危险性，而另一些则缺乏公开的毒性数据，其对人体健康和环境的潜在影响令人担忧。淘汰措施应以避免使用危险化学品为目标，确保塑料包装的制造、使用、重复使用和回收安全无虞。

While hazardous chemicals are part of the above criteria for identifying problematic plastics, this is not yet sufficiently reflected in the example list above. Other organisations who have specific expertise on hazardous chemicals need to be consulted in the Treaty process to ensure these are fully considered also for other applications beyond packaging.

虽然危险化学品是确定有问题塑料的一条标准，但这一点在上述的示例清单中并未得到充分体现。在制定条约的过程中，需要咨询在危险化学品方面具有专业知识的其他组织，确保这些化学品在包装之外的其他应用领域也得到充分考虑。

In addition, while the criteria at the start of this chapter identify as problematic all types of plastic packaging that are not reusable, recyclable, or compostable in practice and at scale, the table above covers only a fraction of those.

此外，虽然本附录开头部分的标准确定了不可在实践中大规模重复使用、回收或堆肥的所有塑料包装都是有问题的，但上述表格仅涵盖了其中一小部分。

Less than 29% of all plastic packaging put on the market is currently recyclable in practice and at scale.²⁰ The remaining 71% that is currently not recyclable does not necessarily all need to be eliminated *today*, but the instrument should contain a mechanism so that if, after a defined period, solutions are not found that are compatible with circular design rules for packaging (see [Appendix B](#)), these types of packaging go on the elimination list.

目前市场上只有不到29%的塑料包装可在实践中大规模回收。²⁰ 剩余的71%为不可回收的塑料包装，虽然不是要立即全部淘汰，但文书应包含一个机制，以确保若在规定时间内未能找到符合包装循环设计原则的解决方案（见[附录B](#)）时，将这类包装列入淘汰清单。

As an example, business-to-consumer **flexible plastic packaging** — e.g. sachets — is the fastest-growing packaging category, but currently not recyclable in practice and at scale.

例如，企业向消费者提供的**塑料软包装**（例如小尺寸的包装袋）是增长最快的包装类别，但目前无法在实践中大规模回收。

Some governments are already taking measures that go beyond banning materials and formats identified in the above mentioned list:

除上述禁用清单列出的材料和品类外，一些政府已采取其他措施：

- The 2022 proposal for an EU-wide Packaging and Packaging Waste Regulation (PPWR)²¹ requires that if a certain packaging category is not recyclable in practice and at scale by 2035, it cannot be put on the EU market anymore.
- 2022年欧盟《包装和包装废弃物条例》(PPWR)提案²¹要求,若某类包装在2035年前无法在实践中实现规模化回收,则不能再投放至欧盟市场。
- The Chilean government recently approved a bill²² to limit the use of a number of single-use products, including sachets for some industry categories.
- 智利政府近日通过了一项法案²²限制若干一次性产品的使用,包括某些行业使用的包装袋。

²⁰ Calculation is based on plastic packaging weight data from Wood MacKenzie and recyclability is assessed according to the Global Commitment definition — which requires that recycling is proven to work ‘in practice and at scale’ — and using the suggested thresholds and outputs of the 2022 New Plastics Economy Recycling Rate Survey. For more information see chapter 3 (“Reusable, recyclable, or compostable”) and Appendix I of the [2022 Global Commitment Progress report](#)

²⁰ 计算依据为伍德麦肯兹公司(Wood MacKenzie)提供的塑料包装重量数据,可回收性的评估依据为全球承诺的定义(即回收被证明可以“在实践中大规模”开展)以及2022年新塑料经济回收率调查的建议阈值和回收产出。详见《[2022年全球承诺进展报告](#)》第三章(“可重复使用、可回收或可堆肥”)和附录I。

²¹ [European Commission: Proposal for a Regulation on packaging and packaging waste](#)

²¹ [欧盟委员会:关于包装和包装废弃物法规的提案](#)

²² [Chilean Ministry of Environment: Law 21368](#)

²² [智利环境部:第21368号法律](#)

Appendix B: Circular design rules for packaging

附录B: 包装的循环设计规则

The instrument must include rules on design for circularity

文书必须包含循环设计规则

The elimination of types of plastic packaging that are commonly identified as problematic is essential (see [Appendix A](#)), but alone it is not enough to end plastic pollution. **The Treaty should also set a time-bound objective to ensure that all plastic packaging put on the market is designed for a circular economy.** This includes:

淘汰常见的问题塑料包装至关重要(见[附录A](#)), 但仅此不足以终止塑料污染。条约还应设定有时限的目标, 确保市场上的所有塑料包装都是为循环经济而设计的。这包括:

- **Making reusable packaging a priority** by setting reuse targets for different packaging categories based on common standards, definitions, and measurements to enable and incentivise the scaling of reuse and refill solutions.
- **优先确保包装可重复使用。**在通用标准、定义和衡量标准的基础上, 为不同类型的包装设定重复使用目标, 以促进和激励重复使用和重复灌装解决方案的推广。
- When it is not possible to eliminate packaging, any **packaging must be recyclable or— where relevant — compostable, in practice and at scale** (see below).
- 若不可能淘汰包装, 则任何**包装的回收或堆肥(如适用)都必须能在实践中大规模开展**(见下文)。
- **Design requirements and disclosure of information on chemical composition** is key to ensure that plastic packaging is safe to be made, used, reused, and recycled.
- **设计要求和化学成分披露**对确保塑料包装的制造、使用、重复使用和回收的安全至关重要。

Recyclability must go beyond just ‘technical recyclability’

可回收性必须超越技术层面

Out of all packaging circularity terminology, recyclability is perhaps the most ambiguous term.

在所有循环包装术语中, “可回收性”可能是最模棱两可的术语。

The first step is to ensure that plastic packaging is ‘designed for recycling’ or ‘technically recyclable’. Many guidelines already exist for this, and while they have some differences, they are broadly aligned across the world.

第一步是确保塑料包装是“为回收而设计”或“技术上可回收”的。在这方面已经有很多准则, 虽然各套准则之间多少有一些差异, 但在世界范围内是大致一致的。

A few examples of these guidelines include: [The Consumer Goods Forum Golden Design Rules](#), [The Association of Plastic Recyclers \(APR\) Design Guide](#), China National Resources Recycling Association:

‘General guidelines for the evaluation of plastics products’, [Indian Plastic Pact Design Guidance](#), [Australian Government: National Plastics Plan](#) and [Plastics Recyclers Europe RecyClass Guidelines](#).

这些准则包括: [消费品论坛的黄金设计规则](#)、[塑料回收协会\(APR\)的设计准则](#)、中国物资再生协会的《塑料制品易回收易再生设计评价通则》、[印度塑料协议的设计指南](#)、[澳大利亚政府的《国家塑](#)

料计划》和欧洲塑料回收协会 (Plastics Recyclers Europe) 的 RecyClass指南。

This high level of alignment on what ‘technically recyclable’ means is an important starting point, but is not enough by itself. It also needs to be proven ‘**in practice**’ and ‘**at scale**’ that a packaging type or format can be recycled.

“技术上可回收”在含义上达成高度统一是一个重要基础，但仅凭这一点还不够，还需证明一种包装类型或形式的回收“**付诸实践**”可行并可“**大规模**”实施。

‘**At scale**’ means that the proof needs to be more than a lab test, pilot, or a small region. It means that recycling of a certain packaging type needs to be proven to work in practice in multiple regions, collectively representing a significant and diverse geographical area and population, so that the practice is replicable.

“大规模”意味着这种可回收性不应局限于实验室测试、试点或局部地区，也就是说需要证明回收某类包装在多个区域(涵盖大量不同的地理区域和人口)都实际可行，从而易于推广。

‘**In practice**’ means that within each of these regions, it is proven that the collection, sorting, and recycling system (from consumer to recycled material) achieves recycling a significant share of all packaging of that type put on the market.

“付诸实践”意味着在这些地区，需要证明收集、分选和回收系统(从消费者到回收材料)可以回收市场上所有此类包装的很大一部分。

This ‘in practice and at scale’ approach is already used by more than 130 large businesses²³ in the Global Commitment to assess the recyclability of their plastic packaging portfolio. In the Global Commitment, and in a 2025 timeframe, the test and threshold to assess if the recyclability of a packaging design is proven ‘in practice and at scale’ is: does that packaging achieve a 30% post-consumer recycling rate in multiple regions, collectively representing at least 400 million inhabitants?

超过130家签署“全球承诺”的大型企业²³已采用这种“付诸实践且大规模”实施的标准评估其塑料包装产品的可回收性。“全球承诺”中，在2025年的时间框架内，评估包装设计的回收是否在“付诸实践且大规模”可行的标准和阈值为，该包装是否在多个区域(涵盖至少4亿居民)达到30%的消费后回收率。

²³ [Global Commitment 2022, Signatory Reports](#)

²³ [2022年全球承诺进展报告, 签署方报告](#)

The EU proposal for a Packaging and Packaging Waste Regulation (PPWR) also acknowledges the need to go beyond just design for recycling. It sets an objective for all packaging to be recyclable ‘at scale’ by 2035, meaning packaging is collected, sorted, and recycled through infrastructure covering at least 75% of the Union population.²⁴

欧盟《包装和包装废弃物条例》(PPWR)提案也提出,不能局限于为回收而设计。提案设定了一个目标,即到2035年,所有包装的回收都可“大规模”实施,也就是说,包装可以通过覆盖欧盟至少75%人口的基础设施来收集、分选和回收。²⁴

The Treaty should set a time-bound objective for all packaging to be recyclable or compostable in practice and at scale. Design standards to ensure recyclability are an important starting point, but the Treaty needs to go further and create a harmonised understanding of ‘recyclability’, reinforcing the principle of ‘in practice and at scale’.

条约应设定一个有时限的目标,使所有包装的回收和堆肥都可在实践中大规模实施。确保可回收性的设计标准是一个重要基础,但条约需要更进一步,制定统一的“可回收性”定义,强调“付诸实践且大规模”实施的原则。

Compostable plastic packaging is not a blanket solution 可堆肥塑料包装并非万全之策

Substitution to compostables should not be undertaken in place of eliminating plastic packaging or scaling reuse solutions. Compostable packaging relies on 100% virgin material input and must be considered as ‘single-use’ in the same way that conventional plastic or paper is.

用可堆肥包装作为替代方案不应取代淘汰塑料包装或推广重复使用的解决方案。可堆肥包装依赖100%的原生材料投入,而且必须与传统塑料或纸张一样归类为“一次性”包装。

Replacing conventional plastics with compostable plastics is not necessarily beneficial from an environmental point of view, except for a few distinct applications that have been identified so far. These include items that facilitate the collection of organic materials, items frequently found contaminating organic waste streams (e.g. tea bags, fruit stickers) and food packaging likely to remain highly contaminated with food (e.g. sauce sachets).²⁵

除了目前已经确定的少数特殊领域之外,可堆肥塑料取代传统塑料并不一定对环境有益。这些领域包括有利于有机材料收集的物品、往往会污染有机废弃物流的物品(如茶包、水果标签)以及可能残留大量食品的食品包装(如酱料包)。²⁵

²⁴ [European Commission: Proposal for a Regulation on packaging and packaging waste](#)

²⁴ [欧盟委员会:包装和包装废弃物法规的提案](#)

²⁵ [Ellen MacArthur Foundation: Substitution to compostable flexibles: Design and circulation](#)

²⁵ [艾伦·麦克阿瑟基金会:可堆肥软包装的替代方案——设计与循环使用](#)

Appendix C: Extended Producer Responsibility (EPR)

附录C:生产者延伸责任(EPR)

Mandatory EPR is a necessary part of the solution to manage packaging waste and reduce plastic pollution

强制性EPR是管理包装废弃物和减少塑料污染的必要举措

Mandatory, fee-based Extended Producer Responsibility (EPR) schemes are the only proven way to secure the required dedicated, ongoing, and sufficient funding to cover the net cost of the collection, sorting, and recycling of packaging. As such, they represent a necessary part of the solution to manage packaging waste and reduce plastic pollution.²⁶

强制性、收费式生产者责任延伸(EPR)制度是唯一经证实可为包装的收集、分选和回收的净成本提供专项、持续及充足资金的机制。因此,这类制度是管理包装废弃物和减少塑料污染的一项必要举措。²⁶

The collection, sorting, and recycling of packaging waste is typically not profitable and requires additional funding to operate. Through EPR legislation, all industry players introducing packaging to the market are required to provide funding dedicated to collecting and processing their packaging after its use. The alternatives – relying on funding from public budgets or from voluntary contributions alone – are unlikely to scale to the extent required and fall short of ensuring a long-lasting shift to a circular economy in the packaging sector.

包装废弃物的收集、分选和回收通常无法盈利,需要额外的资金支持。EPR立法要求所有将包装引入市场的行业参与者必须提供资金用于收集和处理使用后的包装。仅依靠公共预算或自愿捐款提供资金的替代方案不太可能达到所需的规模,也无法确保包装行业循环经济的长期发展。

In many geographies the collection of packaging and other municipal waste depends on people working in precarious conditions without basic social and labour protection. Socially inclusive EPR legislation can provide opportunities for the informal sector, while poorly designed schemes could present threats to the livelihoods of the waste picker community, for example by limiting their access to valuable waste streams.²⁷

在许多地区,包装和其他城市垃圾的收集依赖于工作条件不稳定、没有基本社会和劳动保障的群体。具有社会包容性的EPR法规可为非正规部门提供机会,而设计不当的EPR制度则可能对拾荒者群体的生计构成威胁,例如限制他们获得有价值的废弃物。²⁷

There is strong and growing support for mandatory EPR

强制性EPR日益得到广泛支持

There is now broad recognition by many different stakeholder groups that EPR is a necessary part of the solution to packaging waste and pollution. In 2021, [more than 100 leading businesses](#) from across the packaging value chain publicly endorsed EPR as a necessary part of the solution to manage packaging waste, recognising that without EPR policies “packaging collection and recycling is unlikely to be meaningfully scaled and tens of millions of tonnes of packaging will continue to end up in the environment every year”. EPR’s crucial role in improving waste management has also been acknowledged

by many environmental NGOs and other civil society organisations.

目前，许多利益相关方团体普遍认识到，EPR是解决包装废弃物和污染的必要举措。2021年，包装价值链上[超过100家领先企业](#)公开认可EPR是解决包装废弃物问题的必要举措，并认识到，如果没有这类政策，“包装的收集和回收就不可能得到有效推广，每年仍将有数千万吨的包装继续进入环境中”。EPR在改善废弃物管理方面的关键作用也得到了许多环保非政府组织和其他民间社会组织的认可。

Building on more than 30 years of experience, mandatory fee-based EPR schemes have now been implemented in many countries across the world. In recent years, legislation has emerged across all continents, including countries in South America, Southeast Asia, and Africa. Countries like the United Kingdom that previously adopted an alternative approach, such as the Packaging Recovery Notes (PRN), are now moving towards implementing mandatory, fee-based EPR. Other countries have progressively improved and expanded their already existing schemes.

强制性、收费式EPR制度积累了30多年的经验，目前已在全球许多国家实施。近年来，南美洲、东南亚和非洲等地诸多国家都启动了EPR立法。英国等国家之前采用的是包装回收记录（PRN）等替代方案，目前则致力于实施强制性、收费式EPR制度。其他国家也已逐步完善和推广现有制度。

²⁶ EPR schemes can be applied to product categories other than packaging. This document focuses on EPR for packaging only.

²⁶ EPR制度可应用于包装以外的产品类别，本文件仅关注包装行业的EPR制度。

²⁷ WIEGO (2022): [Extended Producer Responsibility and Waste Pickers](#); Global Alliance of Waste Pickers: [Position on EPR](#) (2021)

²⁷ WIEGO (2022年): [《生产者延伸责任与拾荒者》](#); 全球拾荒者联盟: [《关于生产者延伸责任的立场》](#) (2021年)

Criteria for determining what constitutes an effective EPR scheme

确定有效EPR制度的标准

To address important limitations and draw lessons from the implementation of EPR schemes to date, several reports and publications by different stakeholder groups have highlighted key considerations for what an effective and inclusive EPR scheme looks like.

为解决实施EPR制度的重要制约因素并从迄今已实施的工作中汲取经验，多个利益相关方团体发布了若干报告和出版物，并着重指出有效和具有包容性的EPR制度的关键要素。

After a thorough review of these existing publications, we have identified the key elements to take into consideration when designing effective EPR schemes:

在全面审视这些现有出版物后，我们总结了在设计有效的EPR制度时应考虑的关键要素：

1. **Scope of covered packaging types and materials:** it is important to clearly define what is considered as packaging, and to ensure the scope of covered packaging is comprehensive both in terms of packaging types as well as packaging materials.
1. 包装类型和材料的涵盖范围：必须明确界定什么是包装，并确保全面覆盖各种包装类型和包装材料。
2. **Scope of activities, and granular, ambitious and time-bound targets:** it is crucial to ensure that it is clear to all stakeholders what activities funding should be raised and used for, and what outcomes need to be delivered by when. Targets should be defined in a consistent way for all countries, while timelines to achieve them might differ and be defined starting from each country's individual baseline.
2. 活动范围以及具体、宏大且有时限的目标：必须确保所有利益相关方明确认识到应为哪些活动筹集和使用资金以及应在何时取得什么成果。必须以一致的方式为所有国家设立目标，实现这些目标的期限可以有所不同，可根据各国的基准确定。
3. **Roles and responsibilities of stakeholders:** to ensure successful implementation, any EPR scheme needs to clearly define who bears what part of the financial and operational responsibilities to fulfil the objectives and targets. It is also important to consult and include all stakeholders involved, including the informal sector, both in the design phase and implementation phase of the EPR scheme.
3. 利益相关方的职责：为确保顺利实施，任何EPR制度都须明确规定在实现目标和指标的过程中各方须承担的财务责任和运营责任。在EPR制度的设计和实施阶段，还必须咨询所有利益相关方（包括非正规部门），使其参与其中。
4. **Mechanisms to ensure robust and transparent reporting, monitoring, and enforcement:** failure to provide consistent enforcement undermines the performance of EPR schemes and creates unfair advantages for those who do not meet their obligations. Data and constant monitoring are needed to evaluate performance and determine what adjustments need to be taken.
4. 确保报告、监测和实施机制有力且透明：若无法确保执行的一致性，则会影响EPR制度的成效，而这将使不履行义务者获得不公平的优势。收集数据和持续监测执行情况也至关重要，这可以帮助评估成效并确定后续需要进行哪些调整。
5. **Waste prevention / circular design measures:** several countries have introduced, or have started looking to introduce, changes to their EPR schemes to further strengthen the incentives for upstream solutions. These include the introduction of eco-modulation of fees and reusable packaging targets.
5. 废弃物预防/循环设计措施：一些国家已经或已开始考虑修订其EPR制度，以进一步加强对上游解决方案的激励。这些更改包括引入费用生态调节机制和可重复使用包装目标。

Taking into account the elements above, the international legally binding instrument should provide global support for countries to develop and enforce effective EPR legislation, while acknowledging

the need for adaptation to the local context. The instrument should determine the core provisions and key principles to establish socially inclusive, harmonised, and transparent EPR schemes.

考虑到上述因素，具有法律约束力的国际文书应为各国制定和执行有效的EPR制度提供全球支持，并同时需要因地制宜地进行调整。文书应确定有助于制定具有社会包容性、统一和透明的EPR制度的核心条款和关键原则。

Selected publications from different stakeholders highlight a broad level of alignment on EPR as a crucial mechanism:

各利益相关方的部分出版物强调了对EPR作为关键机制的广泛认同：

- [Ellen MacArthur Foundation EPR Statement and Position Paper](#): unites more than 150 leading businesses and other organisations from across the packaging value chain behind the message that EPR is a necessary part of the solution to packaging waste and pollution.
- [艾伦·麦克阿瑟基金会的《生产者责任延伸制度声明和立场文件》](#): 联合了包装价值链上超过150家领先企业和其他组织，共同提倡EPR是解决包装废弃物和污染问题的必要举措。
- [WWF basic principles](#): establishes what an effective EPR scheme for packaging looks like. WWF has developed this set of 15 basic principles for designing and implementing effective EPR frameworks including general considerations, financing and controlling, scope and inclusivity.
- [世界自然基金会的基本原则](#): 确定了有效的EPR制度的基本要素。世界自然基金会制定了15项基本原则，为设计和实施有效的EPR框架提供指导，其中包括总体考虑、筹资和控制、范围以及包容性。

- [Global Waste Picker Alliance](#) and [WIEGO](#) put together best practices and basic principles on inclusivity, examining how EPR presents unique opportunities as well as threats to the informal sector community. They find that the success of an EPR system depends on an effective collection mechanism, and waste pickers are key to the attainment of material recovery targets.²⁸
- [全球拾荒者联盟](#)和[非正规就业妇女:全球化和组织化\(WIEGO\)](#)汇编了关于包容性的最佳实践与基本原则,研究了EPR为非正规部门带来的独特机遇与威胁。他们发现,EPR体系的成功有赖于有效的收集机制,而拾荒者是实现材料回收目标的关键。²⁸
- [Consumer Goods Forum \(CGF\) paper](#): highlights the optimal design of EPR programmes to improve the performance of waste management and recycling systems. Their key principles for optimal EPR are: Strong environmental outcomes; Efficient, cost-effective, transparent, and accountable; Shared financial responsibility; Convenience for consumers; Long-term financial sustainability; Producers' capability to secure material for closed-loop recycling; Social inclusiveness and fairness, especially in transitional markets with informal sector involvement.
- [消费品论坛\(CGF\)的文件](#):强调通过优化设计的EPR制度改善废弃物管理和回收系统的效果。优化EPR制度的主要原则包括:巨大的环境效益;高效率、低成本、透明度、责任制;成本共担;为消费者提供便利;长期财务可持续性;生产者确保材料闭环回收的能力;社会包容性和公平性,尤其是在有非正规部门参与的过渡期市场。
- [PREVENT Waste Alliance EPR Toolbox](#): the EPR Toolbox developed by the PREVENT Waste Alliance is a collection of internationally relevant knowledge on the topic of EPR for packaging. It provides concrete examples and case studies on the implementation of EPR schemes. Its aim is to enhance the development of EPR systems worldwide and could be used as a starting point for knowledge exchange under the Treaty.
- [废弃物防治联盟\(PREVENT Waste Alliance\)的EPR工具包](#):由废弃物防治联盟开发的EPR工具包集合了国际适用的包装行业EPR知识。该工具包提供了实施EPR制度的具体示例和案例研究,旨在推动世界各地EPR体系的发展,可作为根据条约开展知识交流的起点。

The Treaty must support the introduction of mandatory Extended Producer Responsibility (EPR) schemes and ensure the effectiveness of EPR legislation

条约必须支持引入强制性生产者延伸责任(EPR)制度并确保EPR法规的实效

Over time, EPR should become mandatory in every country around the world to reduce the amount of mismanaged packaging waste, and promote circular economy solutions in the packaging sector.

为减少管理不善的包装废弃物并在包装行业推广循环经济解决方案, **EPR**应逐步成为全球各国的强制性制度。

The global plastics treaty should provide **key principles and criteria** for packaging EPR schemes in terms of: the scope of covered material; the scope of activities and targets to be achieved; roles and responsibilities of stakeholders involved; and reporting, monitoring, and enforcement mechanisms.

全球塑料条约应为包装行业EPR制度提供以下方面的关键原则和标准:涵盖的材料范围,活动范围和须实现的目标,所涉利益相关方的职责,以及报告、监测和实施机制。

In addition, the Treaty presents a unique opportunity to provide the necessary support for setting up the legislative framework as well as enabling its subsequent enforcement. This could be achieved through a **global EPR hub** to help governments develop and implement effective

legislation, and facilitate knowledge exchange across countries as recognised by several Producers Responsibility Organisations (PROs) and EPR organisations.²⁹

此外，条约提供了独特的机会，为制订法规框架并促进其实施提供了必要支持。为此，可建立一个全球**EPR**网路帮助各国政府制定并执行有效的法规，并促进各国交流知识——这一点已得到若干生产者责任组织 (PRO) 和EPR组织的认可。²⁹

Mandating EPR at a global level, providing key principles and criteria, and a knowledge sharing platform for EPR implementation, would also enable better global data collection and transparency to support decision-making processes, and ensure harmonisation across countries – which is critical to manage packaging of globally traded products, and to incentivise upstream/midstream solutions and better packaging design.

在全球层面强制推行EPR制度，并为其实提供关键原则和标准以及知识共享平台，还能够改善全球数据的收集并提高透明度，从而支持决策过程并确保各国之间协调一致，这对于管理全球贸易产品的包装以及推动制定上游/中游解决方案和改进包装设计至关重要。

Harmonisation of EPR schemes globally would also be beneficial to business, including multinational corporations dealing with a multitude of different national EPR legislations, as well as SMEs who conduct some international trade, but do not have the resources and capacity to comply with the current complex legislative landscape.

在全球范围内统一**EPR**制度也对企业有利，包括需要应对各国不同EPR法规的跨国公司，以及业务涉及国际贸易但缺乏资源和能力应对当前复杂法律环境的中小型企业。

²⁸ WIEGO (2022): [Extended Producer Responsibility and Waste Pickers](#)

²⁸ WIEGO (2022年):《生产者责任延伸与拾荒者群体》

²⁹ CITEO [Integrate EPR within the international Plastics treaty](#) - pre INC-1 submission

²⁹ CITEO: [《将生产者责任延伸制纳入国际塑料条约》](#)——政府间谈判委员会第一次会议前提交的文件