

Plastics at Basel COP15

Plastic waste trade

Three years after the Basel Convention COP14 adopted the plastic waste trade amendments that came into force in January 2021, [the global plastic waste trade](#) has shifted but remains a cause of [environmental injustice](#), with communities and ecosystems in importing countries bearing a disproportionate portion of the toxic burden associated with the dumping, burning and environmentally-unsound recycling of plastic waste.

In particular, the accurate identification and control of plastic wastes and waste streams with significant plastic fractions remains a challenge. Y48 plastic wastes continue to cross borders uncontrolled, [buried in paper waste](#), in [refuse-derived fuel \(RDF\)](#), and as textile waste shipments. Meanwhile, waste PVC continues to be traded, ostensibly without prior consent, although it meets the Basel Convention criteria for hazardous wastes, both [as a halogenated polymer](#) and [because of additives](#) used in PVC. Finally, importing countries that have received illegal waste shipments continue to face obstacles to return shipments to their senders.

However, the *Draft updated technical guidelines for the identification and environmentally sound management of plastic wastes and for their disposal* (draft plastic waste guidelines) provide more confusion, rather than clarity, on all these challenges:

- by failing to clearly identify plastic waste streams that fall under the plastic amendments, including by failing to address multiple Basel Annex IX entries for uncontrolled wastes that could overlap with controlled plastic wastes (especially the Y48 listing);
- by failing to clarify the difference between environmentally-sound, and environmentally unsound recycling and other recovery operations, and failing to take into account climate impacts in particular;
- and by offering vague language on the critical issue of contamination that distinguishes uncontrolled plastic wastes (B3011) from controlled ones (Y48).

For all these reasons, **the COP must delay adoption of the plastic waste guidelines, to allow for vital further work** so they can fulfill their mandate of helping Parties and other stakeholders correctly identify plastic wastes according to the new listings B3011, Y48 and A3210, as well as manage plastic wastes in an environmentally-sound manner, with a priority on prevention.



What counts as plastic recycling?

The plastic waste amendments introduced trade controls that are partly based on the kind and quality of waste management in the importing country. In particular, entry B3011 exempts from trade controls plastic wastes that are clean, sorted and non-halogenated, when they are destined for “recycling in an environmentally-sound manner”.

However, distinguishing genuine plastic recycling from other recovery or even disposal is no easy task. The limits of mechanical recycling have come sharply into focus in recent years, both in terms of [overblown recycling rate claims](#) and of [toxics in recycle](#). [Existing but unsuccessful](#) thermal (pyrolysis, gasification) and solvent-based recovery processes for plastics have been marketed as novel “chemical recycling” or “advanced recycling”, when in fact their energy requirements are colossal, and they do not tolerate mixed or contaminated inputs, making them unfit for post-consumer plastic waste, and significant emitters of hazardous waste, or at best, [dirty fuel](#).

For these reasons, it is more important than ever for the draft plastic waste guidelines, and any change to the definition of recycling of organics (R3), to clearly identify plastic recycling as processes that actually convert plastic wastes into recycled plastic. Plastic-to-plastic processes are part of the circular economy to the extent that they [displace virgin plastic production](#) - which is not true of processes that merely convert plastic wastes into chemicals with no guarantee of their final use in the economy, whether they are even clean enough to be used as fuels, or must be disposed of as hazardous waste.

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Therefore, **the plastic waste guidelines must limit recycling of plastics (R3) to plastic-to-plastic processes**, which the current draft fails to do. It is unlikely that this issue, in addition to all the draft’s shortcomings in identifying plastic wastes, can be resolved by a contact group during COP, which is why **COP must delay adoption of the plastic waste guidelines** and allow work to continue intersessionally.

In addition, **any change to the definition of R3 recycling in Annex IV must similarly confine plastic recycling to plastic-to-plastic processes**, leaving plastic-to-fuel and plastic-to-chemicals as other forms of recovery.



Incineration: microplastics and climate impacts

[Critical new research](#) has [consistently found](#) microplastics in incinerator ash, due to the incomplete combustion of plastic waste in municipal waste incinerators. These findings are not included in the current version of the Draft technical guidelines on the environmentally sound incineration of hazardous wastes and other wastes as covered by disposal operations D10 and R1 (draft incineration guidelines).

These new findings on microplastics in incinerator ash **must be included in the draft incineration guidelines before their adoption at this COP**, and considered in decisions around siting of ashfills, and use of incinerator ash, in order to minimize harm to the environment and human health.

Furthermore, [the European Parliament acknowledges](#) that incinerating wastes emits significant carbon, aggravating climate change. Waste incineration can also act as a disincentive to waste prevention and recycling.

New paragraphs should be added to the General guidance section of the draft incineration guidelines, recommending that

- **The incineration of biogenic waste (bio-waste, paper, wood, etc) and plastic waste should only occur after separate collection, sorting, recycling and reuse are fully realized and exhausted;**
- **Taxes on incinerators' carbon emissions be used to incentivise waste-prevention and recycling.**