IPEN
for a toxics-free future

www.ipen.org
ipen@ipen.org
@ToxicsFree

A SMALL SLICE OF THE TOXIC PIE:

WHY REGULATING CHEMICALS ONLY IN PLASTIC PRODUCTS WILL NOT PROTECT HUMAN HEALTH

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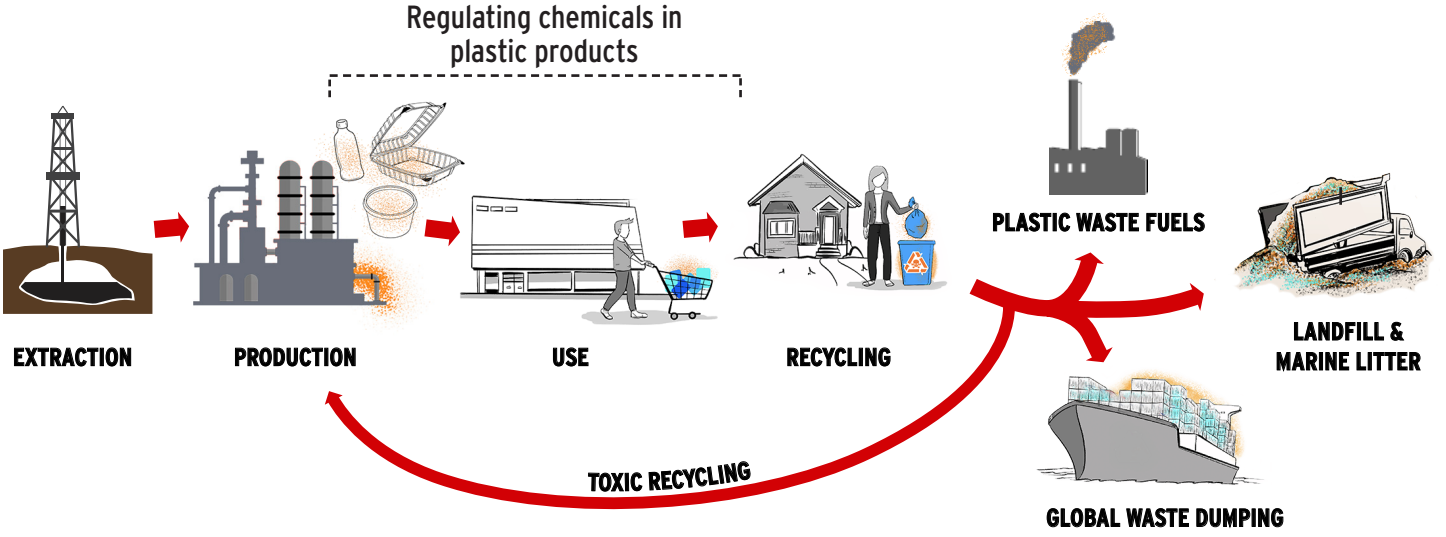
Plastics are chemicals, and of the over 16,000 chemicals linked to plastics, less than 1% are regulated worldwide throughout their full life cycles. Plastic chemicals have therefore been an important topic throughout the negotiations for a new Plastics Treaty, and the discussions have been centered around a full life cycle approach.

Yet the non-paper proposed by the INC Chair suggests that plastic chemicals could effectively be regulated as "chemicals as used in plastic products," even though toxic plastic chemicals can be released during production, use, and disposal, not only during the product stage.

Narrowly focusing on the plastic product stage would fail to address the broader environmental and health impacts associated with plastics throughout their entire life cycle.



Regulating chemicals throughout the **full life cycle of plastics** in accordance with UNEA resolution 5/14

Regulating plastic chemicals as "chemicals in plastic products" would be further complicated by the lack of an internationally agreed-upon definition of "plastic products" and would require further negotiation for a definition within a Treaty.

Moreover, the plastic production and supply chain is complicated and implementing a regulation that only covers part of it would be extremely challenging. Many products are made from different materials and components which may have different suppliers. Regulating chemicals in plastic products would shift the responsibility from the plastic manufacturer to the product manufacturer, which is likely to make compliance very challenging for products with a complex supply chain. For example, one country could produce plastic materials such as pellets or resins and export them to another country for product manufacturing. This would shift the responsibility for chemical management to the second country, making it harder to control the chemicals than it would be by regulating them throughout the entire life cycle.

Conversely, a comprehensive, full life cycle approach would be in line with UNEA resolution 5/14 that sets out the mandate for the Plastics Treaty. Addressing the full life cycle of plastic chemicals is the only way to effectively reduce harmful impacts on human health, the environment, and the climate while promoting sustainable alternatives.

By looking side-by-side at approaches to regulating plastic chemicals, the deficiencies of a products-based approach are clear:

	REGULATING PLASTIC CHEMICALS THROUGHOUT FULL LIFECYCLE OF PLASTICS	REGULATING CHEMICALS OF CONCERN IN PLASTIC PRODUCTS
 Protects human health	**Yes,** through transparency and regulation throughout the full lifecycle of plastics.	**No/Very limited** since definition of products often excludes the stages of production and wastes.
 Prevents environ-mental pollution of leaching chemicals	**Yes,** through regulation throughout lifecycle.	**No/Very limited.** Products will only capture a small part of lifecycle and may not include pollutants resulting from the products at other stages.
 Improves circularity through ensuring that toxic chemicals are not recycled	**Yes,** through transparency, traceability and regulation throughout lifecycle.	**No/Unlikely** as it will only address a part of the lifecycle, not including wastes.
 Prevents export of plastics with toxic chemicals	**Yes,** through transparency, traceability and regulation throughout lifecycle.	**No/Very limited** since it only addresses part of the lifecycle

PROTECTION OF HUMAN HEALTH: Regulating chemicals throughout the full life cycle of plastics provides better protection for human health. If chemicals are only regulated in plastic products, large amounts of uses and emissions remain uncontrolled during other stages of the life cycle, such as during production and waste management, which will likely lead to continued exposures for workers and fence-line communities.

ENVIRONMENTAL PROTECTION: Toxic chemical emissions and releases begin during resource extraction for plastic feedstocks (from extremely polluting oil, gas, and petrochemical operations) and continue through transport, use, recycling, and waste disposal (especially in relation to incineration, plastic waste fuels, and burning). Product-based approaches would fail to capture most of these pollutants.

ENDING TOXIC RECYCLING AND PROMOTING A SAFE, CIRCULAR ECONOMY: If the regulation only applies to plastic products, emissions from plastics once they become wastes are left uncontrolled. This would, for example, not address hazardous chemicals in plastics that are spread when plastics are recycled. It would also mean that transparency and traceability of chemicals will not extend throughout the full life cycle, so recyclers would not know when they are dealing with toxic plastic wastes. Moreover, recycling processes and waste management processes also lead to the formation of toxic plastic chemicals which would not be addressed in a products-based approach.

ENDING EXPORTS OF TOXIC PLASTICS: Similarly, transparency and traceability throughout the life cycle are vital for tracking and ending exports of toxic plastics, since plastics are exported both before and after their product stage, for example, as resins and wastes.

The Treaty needs to include control measures that allow for regulating toxic chemicals in plastics **throughout their full life cycle and across all sectors.**

For more information on how to regulate plastic chemicals, see: Troubling Toxics, IPEN Quick Views.