



# GLOBAL HEALTH AT RISK: A PLASTICS TREATY SCORECARD

ASSESSING THE CURRENT DRAFT TEXT FROM THE CHAIR'S NON-PAPER

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## INTRODUCTION: WHY THE PLASTICS TREATY MUST DO MORE TO PROTECT OUR HEALTH

Plastics are not just a pollution problem — they are a toxic threat to human health. From the moment of birth, people are exposed to harmful chemicals used in plastics, many of which have been linked to cancer, infertility, hormone disruption, and developmental disorders. These chemicals do not just stay in products — they contaminate our bodies, food, water, and air, and they are found across ecosystems, from marine wildlife to mountain soils even in the most remote areas.

Unfortunately, the current draft text from the Chair of the global Plastics Treaty is not strong enough to protect human health. Although significant progress has been made in the negotiations and several countries have committed to reducing plastic production and eliminating hazardous chemicals, the draft of the Plastics Treaty needs strengthening to effectively protect human health and the environment. Countries have the opportunity at INC-5.2 this August to establish the foundations for an ambitious instrument capable of meaningfully addressing the plastics pollution crisis while safeguarding both human health and the environment.

In 2022, IPEN created a [Plastics Treaty Platform](#) to benchmark the ambition of a treaty that promotes an end to the toxic impacts of plastics and the hazardous chemicals in plastics on the health of citizens, workers, vulnerable populations, Indigenous Peoples, and the environment. With this 17-point platform, IPEN outlined how the Plastics Treaty should address the major issues around the plastics crisis and urged governments and stakeholders to seize the opportunity of the Plastics Treaty development process to create a global tool to achieve — by the year 2030 — **a full detoxification of plastic materials** so that toxic chemicals in plastics do not contaminate our food, bodies, water, soil, and air.

**IPEN's Plastics Treaty Scorecard** evaluates the Chair's current [draft treaty text](#) from December 1, 2024, that was developed following the fifth round of negotiations against IPEN's 17 key criteria for protecting human health from plastics and plastic-related chemicals. **The findings are clear: the draft treaty text does not go far enough to safeguard health.**

The stakes could not be higher with plastic production set to quadruple by 2060 and toxic chemical production projected to follow the same evolution. The Plastics Treaty must be more than a clean-up pledge — it needs to be a **detox plan** that addresses the toxic impacts from plastics across their entire life cycle, from production to disposal.

IPEN and its global network call on governments to deliver a treaty prioritizing human health. That means phasing out hazardous chemicals, ending toxic recycling, ensuring transparency and accountability, and upholding the human right to a clean, healthy environment.

**The science is clear. Solutions exist. But the treaty, as it stands, falls short.** This scorecard lays out what is missing, with recommendations for strengthening the current text.

### SCORECARD LEGEND

- = The text contains options that would align with key priorities identified by IPEN's Plastics Treaty platform.
- = Improvements to the current text are needed, or the text would only align with the platform through further work by the Conference of the Parties (COP) after the Treaty is adopted.
- = The text does not align with the platform — major changes in the text will be needed to reach a meaningful, health-protective Treaty.

Note: Brackets below reflect text options included in the Chair's draft. Brackets denote text that has not been agreed upon.

IPEN'S PLASTICS TREATY PLATFORM CALLS FOR THE TREATY TO:	DOES THE CHAIR'S TEXT CONTAIN OPTIONS TO ADDRESS THE KEY CONCERNS IN IPEN'S PLASTICS TREATY PLATFORM?	RECOMMENDED IMPROVEMENTS
<p>1. Have an overall objective to protect human health and the environment from all adverse impacts of plastics, including curbing toxic and climate pollutants, based on the precautionary principle similar to Article 1 of the Stockholm Convention.</p>	<ul style="list-style-type: none"> <li>● <i>The objective is to protect human health and the environment from plastic pollution, including in the marine environment [based on a comprehensive approach that address the full life cycle of plastics].</i></li> </ul> <p>Neither the objective nor the relevant provisions refer to the precautionary principle. The preamble of the text does refer to the Rio Principles which include the precautionary principle, but there is no specific reference.</p> <p>Also, plastic pollution is not defined so it is not clear if chemical pollutants are included.</p>	<p>A specific reference to the precautionary principle should be included in the objective.</p> <p>The bracketed text regarding the life cycle should be adopted so the objective clearly states that the Treaty will take a life cycle approach.</p> <p>Plastic pollution, if defined, should include toxic chemicals.</p>
<p>2. Address all types of plastics, including thermoplastics, thermoset plastics, and thermoelastomers, and the associated chemicals used or generated throughout their life cycle, as well as all forms of plastic pollution, including from micro- and nanoplastics.</p>	<ul style="list-style-type: none"> <li>● Potentially all types of plastics can be regulated under the Chair's draft. However, the options for how to regulate plastics are mainly limited to regulations on products or through voluntary design provisions. The text does not call for a life cycle approach to regulating chemicals or chemical pollutants. Micro- and nanoplastics pollution are regulated through provisions on releases and leakages and through voluntary provisions on design.</li> </ul>	<p>The Treaty should cover all types of plastic materials and include a mechanism for regulating and/or restricting chemicals throughout the life cycle of plastics.</p>
<p>3. Eliminate non-essential uses of plastics and promote innovation to safer, sustainable materials for a toxics-free circular economy.</p>	<ul style="list-style-type: none"> <li>● The Chair's draft does not take an essential use approach to plastics and fails to promote safer, sustainable materials and a toxics-free circular economy. However, it allows for the elimination of certain categories of problematic plastics.</li> </ul>	<p>Article 5 and its related provisions on products, chemicals, releases, and waste should establish design criteria to ensure that plastics are free of toxic chemicals, including a prohibition on recycling plastics that contain such harmful substances.</p>
<p>4. Lead to sustainable production and consumption of plastics with a focus on reduction and minimization.</p>	<ul style="list-style-type: none"> <li>● While some reduction of plastics production is foreseen in the text, including the elimination of problematic plastics, minimization is not clearly a principle inspiring the text.</li> </ul>	<p>The INC should ensure that global, legally binding controls on supply, production volume limits, and transparency and traceability requirements are included. To ensure sustainable production and consumption of plastics, the INC should set a mechanism for the COP to set ambitious, science-based production limits.</p>
<p>5. Require reporting and transparency on the types and amounts of plastics produced, imported, and exported (including the strengthening of the use of international trading HS codes for all transboundary movements of plastics and their associated chemicals), as well as plastic waste generation, collection, and end-of-life management.</p>	<ul style="list-style-type: none"> <li>● While there is a requirement to report on statistical data on primary plastics, the text is not sufficiently precise on what should be reported. The text does not address the issue of HS codes but strongly favors the need to avoid restrictions to trade. The text does not address plastic waste generation, collection, or end-of-life management.</li> </ul>	<p>While it is possible that the Conference of Parties may require detailed reporting, the INC should detail this more comprehensively in the text. Trade considerations should not be favoured over the protection of human health and the environment.</p>
<p>6. Require transparency on the chemicals used in plastics production and as plastics ingredients to be publicly available and communicated in the supply chain and to citizens through labelling and databases.</p>	<ul style="list-style-type: none"> <li>● Some transparency requirements are foreseen by Article 3; however, they are unclear and need to be strengthened to ensure the right-to-know about plastic chemicals throughout the value chain.</li> </ul>	<p>Transparency and traceability of plastic chemicals that are known to be hazardous should be specifically included if they are not banned from use in plastics.</p>
<p>7. Lead to identification and phasing out the use of groups of hazardous chemicals. Priority groups for phasing out that could be named in the Treaty include bisphenols, brominated flame retardants, chlorinated paraffins, phthalates, benzotriazole UV stabilizers, and PFAS.</p>	<ul style="list-style-type: none"> <li>● While grouping is not specifically mentioned, it is not excluded by the formulation of the text provisions on chemicals, potentially leaving this issue to the COP and the subsidiary bodies.</li> </ul>	<p>The text of the Treaty should specifically promote the need to avoid harmful (so-called "regrettable") substitution through, inter alia, adopting a grouping approach to chemicals identification, assessment, and controls, including eliminating chemical groups.</p>
<p>8. Lead to the phase-out of commodity plastics that are toxic, are rarely recycled, and are hazardous when disposed of, including but not limited to polyvinyl chloride (PVC), polyurethanes, polystyrene, and fluorinated polymers.</p>	<ul style="list-style-type: none"> <li>● There is no specific mention of the goal of eliminating polymers of concern, although these plastic polymers could be listed as hazardous chemicals for elimination.</li> </ul>	<p>The Treaty should aim to eliminate all types of hazardous plastic chemicals, including monomers and polymers.</p>
<p>9. Ensure an end to the toxic recycling of existing plastics that contain hazardous chemicals, to ensure a smooth transition to a non-toxic circular economy.</p>	<ul style="list-style-type: none"> <li>● The provisions on design and on waste management promote recycling without specifically promoting the creation of clean material cycles.</li> </ul>	<p>The recycling of toxic chemicals and the inclusion of toxic chemicals in new materials should be prohibited.</p>

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10. Require that plastics are assessed for their health impacts throughout their life cycle, in line with the precautionary principle. Like the Stockholm Convention, lack of full scientific certainty shall not prevent action. National action plans should specifically aim at the minimization of the adverse health impacts of plastics throughout their life cycle.	<ul style="list-style-type: none"> <li>● The text does not aim at assessing the impacts on health from plastics throughout their life cycle. While there is the intention of setting a target on limiting plastics production and elimination of specific plastics based on certain criteria, the health considerations in the draft are minimal.</li> </ul>	Health considerations should be included in all control measures in the Treaty, including by limiting plastics production, design of plastics, and on products and chemicals of concern. The Article on health (Art. 19) should require each Party to carry out a national plastics health assessment aiming to minimize risks to human health.
11. Promote the objectives of existing environmental agreements, including the Stockholm, Basel, Rotterdam Conventions, and SAICM <sup>1</sup>	<ul style="list-style-type: none"> <li>● In relation to the Basel Convention, the Chair's draft reaffirms that transboundary movement of plastic waste is allowed only for the purpose of environmentally sound management. None of the other agreements are considered.</li> </ul>	The Treaty should ensure that hazardous chemicals are identified and eliminated from their use in plastics, including Persistent Organic Pollutants as detailed by the Stockholm Convention. Further, the Treaty should ensure increased transparency on the identification, trade, and use of hazardous chemicals used in plastics in alignment with the Rotterdam Convention.
12. Prioritize environmentally sound end-of-waste policies with a focus on best available techniques such as zero-waste strategies and non-combustion technologies. To prevent the production and release of toxic emissions from plastics waste management, policies should prevent the following dangerous practices: open burning, incineration, co-firing in coal-fired power plants and waste-to-energy processes, co-processing in cement kilns, and chemical recycling.	<ul style="list-style-type: none"> <li>● While the Chair's draft promotes environmentally sound management of plastics, it also promotes "energy recovery" through burning plastic waste.</li> </ul>	The Treaty text should remove references that support energy recovery because burning plastic (waste to energy, refuse derived fuel, or other waste burning schemes) are neither safe nor environmentally sound waste management practices. The Treaty should not promote one technology over others, particularly since there are safer disposal methods, such as non-combustion technologies.
13. Provide new, additional, sustainable and adequate funding for the implementation of the Treaty and require the chemical and petrochemical industry to contribute to financing the prevention and remediation of the pollution their materials cause.	<ul style="list-style-type: none"> <li>● The text does not foresee credible means of implementation to ensure the control measures of the Treaty have new additional, sustainable, and adequate funding.</li> </ul>	The Treaty should seek sufficient and predictable funding to implement the Treaty by including provisions for a dedicated fund.
14. Apply the "polluter pays" principle, which requires that the costs of all impacts on human health, society, and the environment caused by the production, use, dumping, import and export of plastics are recovered through policies such as extended producers' responsibility.	<ul style="list-style-type: none"> <li>● Applying the polluter-pays principle means that producers of plastics should bear the costs of implementation of the Treaty. This is absent from the text.</li> </ul>	The Treaty should include provisions specifying the importance of the complementary role of financial contributions from private sources as an essential element of the means of implementation of the future treaty. A financial mechanism should ensure that the fossil fuels, petrochemicals, and plastics industries bear the environmental and health costs of their activities.
15. Ensure open, transparent, and inclusive participation for civil society, as well as provide resources to ensure broad, gender and regionally balanced public participation, particularly from low- and middle-income countries, allowing public interest organizations to work together with governments to ensure a cooperative multi-stakeholder approach in the implementation and further development of the Treaty.	<ul style="list-style-type: none"> <li>● There are several provisions in the Treaty that allow participation of civil society; however, provisions on access to information, public participation, and access to justice need to be strengthened.</li> </ul>	The Treaty should ensure that Parties provide the broadest public participation in formulating national plans, including participation of the populations most affected by the life cycle of plastics, and including gender-related provisions to ensure that gender-specific needs are met. Similar considerations should be foreseen for the establishment of subsidiary bodies. The Treaty should include stronger text around avoiding conflicts of interest, including during the future treaty's implementation.
16. Provide resources for capacity building and technology transfer to low- and middle-income governments and civil society.	<ul style="list-style-type: none"> <li>● While the article provides for capacity building and technology transfer, the implementation of this provision will be highly dependent on the availability of resources under the financial mechanism.</li> </ul>	The provisions on capacity building and technology transfer should clarify that technologies that have not been proven as environmentally sound should not be supported or promoted.
17. Include a compliance mechanism to ensure the effectiveness of the implementation of the Treaty, including provisions on access to justice.	<ul style="list-style-type: none"> <li>● Yes, a compliance mechanism is included in the Chair's draft.</li> </ul>	In addition to submissions from Parties, requests from COPs, and information provided by the Secretariat, the INC should ensure that the provisions on the compliance mechanism allow the committee to consider independent scientific studies and contributions from stakeholders and rights holders.

1 Now Global Framework on Chemicals



for a toxics-free future

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