



**Environment, Food
and Rural Affairs
Committee**

16th July 2025

Emma Hardy MP

Parliamentary Under-Secretary of State (Minister for Water and Flooding)

Department for Environment, Food and Rural Affairs

By email

Subject: Global Plastics Treaty

Dear Emma,

As you will be aware, the EFRA Committee held an oral evidence session on the Global Plastics Treaty on Tuesday 8th July 2025. This session, part of our themed inquiry into Preventing waste and enabling a circular economy,¹ was accompanied by a call for evidence² asking the following questions:

- What were the main reasons for the INC-5 talks in November 2024 failing to reach agreement on a Global Plastics Treaty?
- What are the main areas of agreement and divergence between parties?
- How might remaining areas of disagreement be overcome at INC-5.2 in August 2025?
- What would represent a successful outcome, and what are the prospects for this?
- What can the UK Government do to demonstrate leadership and drive ambition with regards to the proposed Treaty?

We received in excess of 30 pieces of written evidence³ from a wide variety of stakeholders including NGOs, academics and industry as well as your Department. In our oral evidence session,⁴ we heard from two panels of witnesses: the first comprised Greenpeace UK and academic experts specialising in waste law and plastic pollution; and the second involved industry representatives from across the plastics value chain, from production to waste management.

¹ EFRA Committee, [Preventing waste and enabling a circular economy inquiry page](#)

² EFRA Committee, [Call for Evidence: The Global Plastics Treaty](#)

³ EFRA Committee, [Preventing waste and enabling a circular economy: Written evidence](#)

⁴ EFRA Committee, [Oral evidence session: Global Plastics Treaty, 8 July 2025](#)

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I am writing to set out our observations together with a set of recommendations for your consideration heading into the anticipated final round of treaty negotiations: the second part of the fifth session of the Intergovernmental Negotiating Committee (INC-5.2) in Geneva, Switzerland, from 5-14 August 2025.

Reducing production of primary plastic polymers

A key fault line in the negotiations so far concerns whether or not the treaty should include legally binding obligations to reduce the production of primary plastic polymers. Proponents of such a proposal make up a large majority of the respondents to our call for evidence. Stakeholders present several reasons why, including the rising trend in plastic waste⁵; the limitations of waste management capacity and recycling processes⁶; and the harm caused by plastic waste leaking into the environment⁷. Some, however, caution of unintended consequences that could flow from a cap on production, with the key concern raised being that mass switching from plastics to alternative materials could result in a worse overall environmental impact⁸. Dr Peter Williams, Group Technology Director and Head of Investor Relations at INEOS Group, also told us that “most of the modern materials on which we rely contain plastics” and he did not believe in a production cap, instead suggesting it was more important to “choose the best material for the job”.⁹

We note that the UK, as a founding member of the High Ambition Coalition and signatory to both the Stand Up for Ambition statement¹⁰ issued in December 2024 at the close of INC-5.1 in Busan, South Korea, and the Nice wake up call for an ambitious plastics treaty¹¹ published in conjunction with the UN Ocean Conference in June, supports “the adoption of a global target to reduce the production and consumption of primary plastic polymers to sustainable levels”.

On the balance of the evidence we heard, we are convinced that legally binding targets for reducing production of primary plastics are essential if the tide is to be turned on plastic pollution. This was summed up by Professor Richard Thompson OBE FRS, who told us: “It is... really clear that the rate of production is escalating away at an exponential rate from our ability to manage that waste¹²”.

⁵ OECD, Global Plastics Outlook: Policy Scenarios to 2060, Executive Summary, 3 June 2022. This states that, on current trends, global plastic waste is forecast to almost triple by 2060.

⁶ The British Plastics Federation estimate the recycling rate of plastic packaging in the UK as 50% while Greenpeace suggest it is 17%; though both acknowledge a lack of recycling capacity

⁷ Q33

⁸ Q73

⁹ Q73

¹⁰ Stand Up for Ambition: Statement on Indispensable Elements for an Effective Treaty, 1 December 2024

¹¹ The Nice wake up call for an ambitious plastics treaty, 10 June 2025

¹² Q8



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Recommendation 1: *The UK Government delegation at INC-5.2 in Geneva in August should do everything possible to convince parties to include targets on reducing production, and should not accept a compromise agreement which lacks this element.*

Financing the treaty

We heard competing arguments as to whether the Global Environment Facility (GEF) is the right financial mechanism for the treaty or whether a new, dedicated fund is required. We note that the UK supports the use of the GEF to prevent “further fragmentation of the environmental financial architecture” and to allow for synergies with funding for related climate and nature challenges¹³. This view was echoed by Dr Allison Lindner, Founder and Chair of the Waste Law Research Group.¹⁴ Others, such as Trash Hero UK¹⁵, the Environmental Investigation Agency¹⁶ and WWF-UK¹⁷ advocate a dedicated new fund reflecting the ambition of the treaty and supporting its efficient implementation.

We accept that the GEF, as an existing and well-established financial mechanism to support multilateral environment agreements (MEAs), may have advantages in terms of administrative simplicity and potential alignment with the objectives of other MEAs. However, we note the concern that the GEF may not meet the needs of Global South countries who are worst impacted by plastic pollution¹⁸ and as such will limit the ability of the treaty to be successful. We also note that the establishment of a new fund has widespread support globally: your Department told us 122 countries backed such a proposal at INC-5 in Busan in November¹⁹, while Trash Hero UK put the number at 151²⁰.

Recommendation 2: *We support a new, dedicated fund, specifically designed to enable parties to deliver the treaty’s key objectives, as the financial mechanism underpinning delivery of the agreement.*

Chemicals of concern and harmful plastic products

¹³ [PWC0026](#)

¹⁴ [Q19](#)

¹⁵ [PWC0001](#)

¹⁶ [PWC0010](#)

¹⁷ [PWC0037](#)

¹⁸ [Q18](#)

¹⁹ [PWC0026](#)

²⁰ [PWC0001](#)

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We heard that there are thousands of chemicals in different types of plastic which are believed to have adverse effects on the health of humans, animals and the environment.²¹ The vast majority of respondents to our call for evidence support some form of restriction on chemicals of concern and harmful plastic products (such as non-essential items which are difficult to recycle and/or frequently littered). Given the large number of chemicals involved, suggestions were made that any restrictions should apply to groups of chemicals rather than individual ones²². We acknowledge there are some who argue the scientific evidence base for the exact effects of some chemicals on human health requires more research before restrictions are considered²³, while there are also concerns that mass material switching could have adverse effects, as noted above. To counter this, Prof Thompson suggested to us that criteria of essentiality, safety and sustainability should be applied when considering material switches "so that we are entirely certain that those things are better, not merely different".²⁴

While scientific knowledge can always be advanced, we believe there is sufficient evidence to justify restrictions on certain chemical groupings and harmful plastic products which are non-essential. However, we acknowledge that there are risks that imposing blanket bans could lead to mass switching to alternative materials which could have even worse impacts than the plastics they replace, and that some essential items – for example, certain medical products – may warrant exceptions if no viable substitute is available.

Recommendation 3: *The UK delegation should support the inclusion of a robust Article on chemicals of concern and harmful plastic products. This should comprise a ban on known hazardous chemical groupings and a phase-out of harmful plastic products, while ensuring potential substitutes for these are subject to the same criteria, thereby guarding against unintended consequences from mass switching. The scope and timescale of these measures should be governed by an independent standing scientific panel.*

Product design

Another element of the proposed treaty we examined was product design standards. We heard that harmonised standards on product design could encourage a more decisive shift to a circular economy and thereby reduce plastic pollution²⁵. The industry panel witnesses at our

²¹ [Q30](#) [Prof Thompson]

²² [Q30](#)

²³ [Q33](#)

²⁴ [Q4](#)

²⁵ [Q109](#)

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oral evidence session were in broad agreement that such standards need to apply across international borders in order to maximise collection and recycling rates.²⁶

We note that your Department convened a business roundtable in November 2024 and that the resulting statement calls for “clear global standards and harmonised regulation, which would create the enabling conditions for investments for a system transformation to end plastic pollution”.²⁷ We are also pleased to hear that the UK is working with Chile on developing a stronger Article on product design ahead of the Geneva negotiations.²⁸

Recommendation 4: *The UK should advocate harmonised global design standards aimed at maximising reusability and recyclability of plastic products, and minimising environmental impacts.*

The role of independent scientific advice

As noted above, the scientific evidence base for the impact of plastic pollution is constantly evolving, and will continue to do so. It is vital therefore to consider the role of emerging scientific evidence and how this may be integrated appropriately into any treaty to make it as ‘future-proof’ as possible. The Global Plastics Policy Centre at the University of Portsmouth suggest the establishment of a science-policy panel that will help the treaty to evolve on the basis of the best available evidence.²⁹ Similar suggestions were made during our oral evidence session by Dr Lindner³⁰ and Prof Thompson, who told us the need for a science mechanism is mandated in the original UN resolution (UNEA 5/14).³¹

During our evidence session we also explored concerns raised in written evidence regarding accusations of undue influence from those with vested interests in continuing the status quo interfering with the UNEA INC process.³² We were particularly disturbed to hear of the significant pressure and, in some cases, reported threats faced by independent scientists taking part in the treaty negotiations. We are clear that, while it is vital that all relevant stakeholders are engaged in the talks, and industry involvement is essential for a successful agreement, it is of fundamental importance to the integrity of the process that all parties taking part must be able to do so free of undue influence.

²⁶ Q75; Q109

²⁷ DEFRA, [Plastic pollution treaty: business roundtable statement](#) (accessed 14 July 2025)

²⁸ PWC0026

²⁹ PWC0031

³⁰ Q35

³¹ Q9

³² PWC0001; PWC0010; PWC0023



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Recommendation 5: *The UK delegation must do everything in its power to ensure the highest standards of openness, transparency and inclusivity are upheld at the INC-5.2 talks and should call out any behaviour witnessed which falls short of this.*

Recommendation 6: *We believe it is essential the treaty is based on the latest scientific knowledge, both now and in the future. We therefore support the establishment of an independent standing science-policy panel to assess the treaty's progress and effectiveness and to ensure that new evidence is integrated throughout implementation.*

Breaking the deadlock and maintaining ambition

The vast majority of stakeholders who responded to our call for written evidence believe there is no realistic prospect of the differences in position between the 'High Ambition' bloc and the 'Like-Minded Group' (LMG) of mostly oil-producing nations being resolved in a way which would enable the unanimous agreement of a sufficiently robust treaty. Indeed, the principle of consensus agreement (whereby effectively any single party has the power of veto) is criticised by many stakeholders, with Greenpeace saying it allows the least ambitious countries to "prevent the rest of the world from moving forward".³³ In light of this, various different options have been put forward as to how progress could be made.

Trash Hero UK note that, at INC-1, provisional rules of procedure were adopted that allow members to make decisions by a two-thirds majority vote if consensus cannot be reached, but this option has never been used, after members of the LMG stalled proceedings at INC-2.³⁴ A Plastic Planet,³⁵ the Environmental Investigation Agency³⁶ and WWF-UK³⁷ are among other organisations who stress the importance of agreeing rules of procedure on voting at INC-5.2.

Several ways forward are available in the case of continued deadlock. These include:

- A deal along the lines of the Paris Climate Agreement (under which countries decide their own 'nationally determined contributions' to deliver cuts in greenhouse gases); this could mean some countries deciding to phase out plastic production completely and quickly, while others take a more staged approach.³⁸

³³ [PWC0023](#)

³⁴ [PWC0001](#)

³⁵ [PWC0034](#)

³⁶ [PWC0010](#)

³⁷ [PWC0037](#)

³⁸ [PWC0005](#)



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- The creation of a two-tiered Treaty system, with universal membership to a framework agreement (the Treaty) and limited membership to an additional Protocol - an approach adopted by existing multilateral environmental agreements, such as the Ozone Treaty and the Convention on Biological Diversity.³⁹
- For 'high ambition' countries to proceed with a treaty outside the UNEA INC process – for example, under the auspices of the G7 or G20, or through a voluntary agreement⁴⁰

We are sceptical that the areas of disagreement in evidence at INC-5 in Busan can all be resolved in a way which doesn't severely compromise the objectives of the Stand Up For Ambition statement the UK has signed⁴¹, the aims of which we fully endorse.

Recommendation 7: *The UK delegation should seek to play a leading role in ensuring rules of procedure are agreed at the outset of INC-5.2 which allow for voting in the event of a lack of consensus.*

Recommendation 8: *The UK should not agree to a treaty which lacks any of the key tenets set out in the recommendations in this letter and, in the event that consensus proves impossible to achieve, should seek to take forward an agreement including these elements with other 'high ambition' parties in whatever way the collective parties see fit.*

We would be grateful for a brief response acknowledging our recommendations prior to the commencement of INC-5.2 in Geneva on 5th August; we will then seek a fuller response from you addressing each recommendation in turn in the Autumn once the Geneva talks have concluded.

Yours truly,

Alistair

³⁹ PWC0028

⁴⁰ PWC0001; PWC0010; PWC0031

⁴¹ Stand Up for Ambition: Statement on Indispensable Elements for an Effective Treaty, 1 December 2024



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