

January 19, 2022

The Honorable Gina M. Raimondo
Secretary
Department of Commerce
1401 Constitution Ave, N.W.
Washington, D.C. 20230

RE: Marine Litter and Ocean Plastic
ETTAC Recommendation 2021-06

Dear Secretary Raimondo:

The Environmental Technologies Trade Advisory Committee (ETTAC) is a Federally-established committee whose purpose is to advise on the policies and procedures of the U.S. government that affect environmental technology, goods, and services exports. In this capacity, we appreciate the opportunity to provide these comments and suggestions regarding a future international treaty addressing marine litter and ocean plastics, which will be discussed at the United Nations Environmental Assembly (UNEA) meeting next month in Nairobi.

ETTAC is pleased that Secretary of State Blinken announced in November 2021 that the United States will support the development of a global instrument governing marine litter and ocean plastic pollution. The amount of plastic in the oceans is unacceptable from both a human health and environmental perspective and global plastic production is expected to increase significantly in coming decades.

In August 2021, the State Department hosted a stakeholders' meeting to obtain input on whether the United States should support the development of such an instrument. Several members of the ETTAC participated in the State Department's stakeholders' meeting.

In consideration of the questions posed at the stakeholders' meeting and after additional review and discussion, ETTAC offers the following recommendations:

1. The instrument should contain both binding and non-binding provisions, and should establish impactful roles for stakeholders other than national governments, including sub-national governments, industry, non-governmental organizations, and others.
2. The scope of this instrument should:
 - i. Comprehensively assess the current scope of the issue, including reviewing current literature, assessing impacts, identifying potential obstacles, and identifying future challenges that could exacerbate the problems (e.g., extreme weather);
 - ii. Establish short term, mid-term and long-term targets;

- iii. Reduce the disposal of discarded plastic and other waste materials into waterways by encouraging the development of modern solid waste management systems that capture discarded materials, including mixed plastics, before they enter the environment. Most land-based plastic entering the marine environment is the result of poor solid waste infrastructure. In order to combat this issue, each country needs to have adequate systems in place. Resources should be explicitly allocated to ensure that adequate infrastructure is available to manage this material. This includes intercepting waste that does enter waterways, as well as:
 - a. Collection systems (i.e., trucks, containers)
 - b. Transfer stations
 - c. Sanitary landfills with environmental controls, including greenhouse gas emissions controls;
- iv. Encourage alternative management options for discarded plastics, including:
 - 1. Improving recycling
 - 2. Increasing recycled content in plastics
 - 3. Eliminating unnecessary use of packaging
 - 4. Reducing virgin plastic consumption;
- v. Provide for capacity building and technical assistance to assist developing countries and others;
- vi. Consider innovative financing mechanisms to expedite implementation of modern waste management systems;
- vii. Call for research on microplastics and mechanisms to address their impacts, including filtration devices at wastewater treatment facilities and on washing machines; and
- viii. Explore techniques that can remove plastics from the ocean and other waterways in an environmentally sound manner.

Marine litter and ocean plastics pollution is a global problem that requires a comprehensive internationally recognized instrument providing guidance to all nations. We fully support the United States' efforts to combat this challenge.

We appreciate the Administration's consideration of these comments and suggestions.

Sincerely,



William Decker
ETTAC Chair

CC: Secretary of State Antony Blinken
EPA Administrator Michael Regan