

Dear industry colleague,

As you may know, the United Nations Environment Programme (UNEP) has identified Plastic Pollution as a topic to deal with urgently.

Towards this, they are planning to implement a Global Plastics Treaty (GPT) targeted to be rolled out mid-2025.

The GPT will be implemented via a set of clauses that are listed in the attached document, called ILBI (Internationally Legally Binding Instrument).

These clauses cover various aspects of plastics – production, usage, disposal, financing, etc.

One of the clauses is “**Chemicals of Concern (CoC) in plastics**” (Sr. no. 2 in Part II, page 8 in the attached ILBI).

- Over 13000 chemicals linked to plastics and their production processes have been identified across applications.
- 7,000 chemicals have been screened for their hazardous properties,
- 3200+ identified Chemicals of potential concern based on their hazardous properties

Identified Chemicals of potential concern based on their hazardous properties	
Sl. no	Chemicals
1	Plastic monomers
2	Chemical Additives & Processing aids
3	Specific flame retardants
4	Metals and metalloids
5	Polyfluoroalkyl substances (PFASS)
6	Bisphenols
7	Certain alkylphenols and Alkylphenol ethoxylates
8	Non-intentionally added substances*
9	Ultraviolet light stabilizers
10	Biocides
11	Polycyclic aromatic hydrocarbons (PAHs)
12	Phthalates

***Note - non-intentionally added substances such as polychlorinated dibenzo-p-dioxins and furans (PCDD/Fs) or other contaminants in new products made from recycled plastics.**

The clause will have a deep impact on not just the Plastics industry worldwide, but in India too.

These clauses are currently being discussed by all Governments at various international forums to reach its final text. The next 2 rounds of discussions will be held in July 2024 itself. Depending on what the countries discuss and decide, there would be a ban or restriction on certain chemicals that are considered harmful to humans or the environment. Accordingly, business may get affected.

At this stage, the Government of India is formulating its stand to put across at UNEP. Hence, as the apex body The All India Plastic Manufacturers's Association, this note is to request you to:

- To Get the overview of ILBI please read the attached Zero Draft Document. Also familiarise yourself with the UN document (attached) on "Chemicals in Plastics"
- Check for Restricted Chemicals and inform us if any of your additives contain chemicals that are on the restricted lists of international regulations such as EU 10/2011, RoHS, or TSCA. This means you need to look at the specific chemicals that these regulations prohibit or limit.
- Review UNEP Publication and examine Section 2.1 of the UNEP report "Chemicals in Plastics" attached to see if your additives include any of the chemicals mentioned there.
- If your additives do contain any hazardous chemicals, explain why they are necessary for your product. This could involve discussing their functional importance or how they contribute to the product's performance.
- Search whether you can develop alternatives that do not include hazardous components. This involves researching safer substitutes that can provide similar functionality without the associated risks.

Your urgent response (no later than 23rd July) will help us forward a consolidated viewpoint to the Govt. of India.

Of course, it is no guarantee that India's stand will be accepted by the rest of the world, but we must give it a try.

Please note that we will not be responsible if we are not able to provide an input to the Govt. of India that will protect your just case.

Thanks and Best Regards,

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Chairman - Environment Cell

AIPMA