

Position Paper SWITZERLAND

1. Name of your organization

Federal Office for the Environment

Department of the Environment, Transport, Energy and Communications

Switzerland

2. Your view on major barriers to combatting marine litter and microplastics

Switzerland is a landlocked country. Plastic fragments are ending up in lakes and are contributing some extent to marine plastic pollution through rivers systems. Two main sources are responsible for plastic litter in the aquatic environment:

- **Microplastics deriving from waste sources.**
- **Microplastics deriving other sources:**
 - tyre abrasion
 - washing of clothing
 - paints and road markings
 - loss of microplastic in the production processes of plastics and during the manufacturing of plastics.

At the national level the main gaps and barriers include (specific for Switzerland):

- **Tackling the disperse sources** mentioned under point 2 above.
- **The lack of well-funded data and information about the relevant sources of microplastics.** Also we don't have information about microplastics deriving from abrasion of plastics of buildings, used e.g. in agriculture.
- **The lack of technical solutions and/or the costs for them** when avoiding abrasion and filtering of microplastics.
- **Product policies** which **regulate** the use of **plastics in products.**

At the international level, the main gaps or barriers include:

- **The lack of clear binding standards on plastic pollution mitigation, especially from land-based sources.** This encompasses industry regulation, waste and wastewater management, reduction of non-recoverable microplastics, and human rights implications.
- **Missing or inadequate chemicals and waste management including wastewater management.**
- **The lack of science based product design and production in order to avoid unintentional loss of plastic** throughout supply chains or through wear of products.
- **Geographic gaps in the scope of existing conventions.** Many inland waters and watersheds are not always covered, areas beyond national jurisdiction are only marginally included, the main polluting areas are not covered by a legally binding convention;
- **The lack of a strong capacity-building scheme.**
- **Ineffective compliance and enforcement mechanisms** in multilateral environmental agreements.
- **Insufficient implementation of the polluter-pays principle** tailored to the issue at stake.
- **Solutions focused mainly on adaption measures instead of mitigation.** The overall source-to-sea point of view needs to be established to consider full cycle, i.e. the upstream design phase of plastic products to the final treatment of plastics.
- **Fragmented and/or partial consideration of the problem in existing instruments, organisations and fora and lack of coordination among existing initiatives.** Collaboration and discussions among member

states, among organisations and instruments, and of member states with organisations/instruments is insufficient to address the problem.

- **Current consumption and production patterns drive the issue of marine pollution.** Life cycle approaches and Green Economy principles have not been addressed to the full extent.
- **The environmental, social and economic costs of marine plastics and micro-plastic pollution are not entirely communicated or put in relation to environmental and human health.**

3. Your view on potential national, regional and international response options and associated environmental, social and economic costs

In general, Switzerland judges the option of maintaining the *status quo* as not sufficient. There is a diverse set of response options that speak to the national or international levels. The latter also includes the regional level. Overall, the response options should represent a holistic view on product cycles, including the development of new measures and legally-binding options as well to revise and strengthen the existing framework and add components to address industry. It is also a cross-sectoral approach between freshwater management, sustainable consumption and production, waste management, and coastal and sea management (shipping).

Non-existent or underdeveloped waste management systems result in plastic waste that contributes significantly to the level of marine pollution. Therefore introducing sustainable waste management systems (including wastewater treatment) at the national level, where they are not in place, is crucial. Plastics which are not recycled should be incinerated in an environmentally sound manner. Waste plastics can be used with as very good source of energy in cement kilns. With such waste management measures the input of plastics into the aquatic environment can be combatted very effectively.

The proposed options here aim at minimizing the environmental costs, and we are therefore not listing response options with high environmental costs, i.e. the post-treatment of pollution by marine plastics and microplastics. We focus on the response options that target prevention and mitigation. The costs of prevention and mitigation can be “high” at the beginning, they are, however, in any case minor to any post-treatment of pollution in the mid- to long-term perspective. Although the focus on response options should be on prevention, we must at the same time also do the “cleaning up” and embark in related response options while building up preventive measures.

The “costs of non-action” are always higher than any of the response options. In case we are evaluating the environmental, social and economic costs we also need, at the same time, to evaluate and assess the “benefits of action” of the options with respect to these three dimensions and contrast them to the costs.

The following response options are listed following no prioritization or weighting.

Sound Waste Management and Prevention

- Mainstream environmentally sound waste management and waste prevention into national development strategies. This includes prevention, collection, separation and environmentally sound disposal of waste.

Ban

- Ban of microplastics in cosmetic products.

Recycling

- Recycling rates for plastics need to be discussed, with particular focus on the quality of the recycled material and the aspect of the need of the existance of markets for the recycled material.

Voluntary Commitments

- Encourage and coordinate industry-led solutions and commitments
- Introduce voluntary national reduction targets

Advocacy and Action in Overarching Concepts

- Link the specific engagement of marine plastic pollution with the overarching concepts of Green Economy, Life Cycle Approach, and Sustainable Consumption and Production, and act within those areas, this includes product design or consumption patterns
- Link the topic with the overarching concept of pollution and the associated risks to health (includes human and environmental health)

Reporting

- Standardize global, regional and national reporting on production, consumption and final treatment of plastics, address the whole life cycle

Collaboration

- Increase the collaboration among member states in existing conventions, organisations, and fora, this includes a coherent national position across the responsible ministries
- Increase the collaboration and exchange among existing conventions, organisations, and fora in order to address the issue in a coherent and complementary way, in particular the ongoing work under the Basel Convention

Existing frameworks

- Review and revise of and building linkages between relevant existing instruments
- Harmonize international legal instruments and approaches (as in Regional Seas programmes)
- Promote the implementation of the sustainable development goals, specifically SDG 14 and SDG 12
- Promote the implementation of decisions and activities and guidances of existing instruments, such as the Basel Convention

Guidelines or Standards

- Develop/improve global industry guidelines (e.g. for the management of polymers and additives; adoption of global labeling)
- Establish global standards for industry plastic producers (e.g. encourages the use of extended producer responsibility schemes / polluter pays principle as well as providing information on adverse impacts caused by their products)

Global monitoring

- Establish a monitoring system that includes review and accountability and speaks to the Precautionary Principle (enables a holistic land-to-sea approach view)

Overarching Sustainable Consumption and Production

- Engage in existing overall mechanism and programmes that speak to sustainable consumption and production (existing UN wide instruments such as the UNEP 10YFP are important implementation mechanisms)

Legally-binding architecture

- Establish a new international legally binding architecture that include (all of the) response options presented above
- In parallel, take action in the interim and apply other response options

4. Your view on the feasibility and effectiveness of different response options

In general, we believe that the negative impacts of marine plastic litter and microplastics are detrimental at the biological, ecological and the socio-economic levels and cannot be underestimated. As a result, action on the issue is of utmost importance and evident. The relevance of the problem is ultimately linked to the feasibility as non-action is no longer an option.

At the national level, the feasibility and to some extent the effectiveness of various response options are dependent on the social, environmental and economic circumstances and the enforcement structures in the respective countries. Apart from those national particularities, the preventive measures are to be favored over others with respect to their

effectiveness, i.e. the impact towards the long-term goal of minimizing marine (micro-)plastic pollution. Prevention again, is the most effective solution with respect to the mid- to long-term costs and the issue at stake. The underlying source and causes of marine plastic pollution are primarily land-based. Appropriate (preventive) response options need to tackle land-based sources including harbors.

The feasibility and effectiveness of the response options are to some extent dependent on the fact if they are part of a legal framework and architecture or not. Obligation to set self-determined national reduction targets, development and maintaining national inventories on production, consumption, final treatment and trade of plastics, a duty to cooperate to determine global technical standards to ensure minimum environmental and quality controls by industry, compliance measures, liability and compensation, or funding and information sharing, can all be addressed coherently in a legal framework.

The feasibility and effectiveness is also to be judged with respect to time. Options mentioned above include measures that work with existing instruments and with voluntary measures. Among them there are options that can be taken on today or that can be started within a short period of time. The benefit of taking action in the interim is that we gain experiences that support the development of a potential legally binding architecture or help other medium and long-term response options.

In summary, we need response options that include legally binding and voluntary measures, concern the governments and other stakeholders (including the private sector and consumers) and work on national, regional and international levels as well as across the time scale. Given the extended list of response options the international community has to put their efforts into a few and tangible response options that lead to the highest impact when reducing marine plastic pollution. Time is ultimately an essential driver to move forward with valuable working solutions.

5. Any other inputs
