

U.S. Intervention on Environmental, Social, and Economic Costs and Benefits of Response Options

The background document (UNEP/AHEG/2018/1/INF/4) focuses at a very general level on the costs and benefits of the response options identified in the UNEP Assessment Report prepared for UNEA-3 on “the effectiveness of relevant international, regional, and sub regional governance structures.” Like others, such as New Zealand, have said, form needs to follow function. In our view, we haven’t had sufficient expert level discussion on, or time to digest, the suite of solutions to be sufficiently informed to provide a fulsome view on the costs and benefits of response options or solutions.

We fully understand and appreciate that there was neither sufficient time nor resources for a detailed analysis of costs and benefits of response options to be prepared in advance of this meeting, especially as we have not determined what those options even are. That said, we would like to provide our expectations for this Ad Hoc Open Ended Expert Group process and what an appropriate environmental, social, and economic cost/benefit analysis would be. It would be a more detailed, quantitative analysis that allows for informed decision making.

For instance, take consideration of one potential aspect of a response option: alternatives to plastic. As the delegate from Peru noted yesterday (and more today), there needs to be a cost-benefit analysis to assure that these alternatives are cost effective and will not just introduce another material that may have a negative impact on the environment or human health.

A good example of the type of analysis required is the 2016 TruCost study which utilizes Environmentally Extended Input-Output modeling and Life Cycle Analysis techniques to analyze several consumer goods (e.g. autos, soft drinks, toys, medical products, etc.). This study finds that the environmental costs of alternatives to plastic in these consumer goods are estimated to be almost four times higher. This is the type of analysis that can provide information on trade-offs and guide policy decisions as it indicates true costs borne out of decisions.

And further, in addition to the need for greater quantitative analysis to identify the true costs and benefits, we need to ensure we are looking at all potential response options per the UNEA-3 mandate. The UNEP/AHEG/2018/1/INF/4 document prepared for this session uses a previous UNEP assessment report as its basis (UNEP/EA.3/INF/5). However, that assessment report was limited to international, regional, and sub-regional governance structures. It does not meet the UNEA-3 mandate to QUOTE “identify the range of national, regional, and international response options” END QUOTE. Consequently, we aren’t taking advantage of the full potential of solutions available to us. Such as those at the national and sub-national level or solutions beyond governance that will truly address action on the ground.

Over the last day and a half, I have been inspired. We've heard about so many ways in which countries are grappling with marine litter – from S. Africa's plastic assessment to give them a better handle on where the problems lay to Finland and their ability to capture what was it – over 98% of microplastics from water treatment. This is amazing and I'm interested to learn more about how they do it. All of us understand there are costs to marine litter, but what this process is trying to determine is what are the costs and benefits of potential options. We have limited resources and abilities. Where can we get the biggest bang for our buck ... or I guess shilling may be more relevant given we are in Kenya right now.

We look forward to contributing our expertise in developing robust analyses as this Expert process continues to proceed.