

Submission of Sierra Leone

Call for written submissions – Proposed response template on the potential options for elements towards an international legally binding instrument

On 9th December 2022, the Executive Secretary of the INC Plastic Pollution Secretariat sent a notification inviting written submissions from committee members and observers. The template below is intended to provide guidance to members of the committee and observers in structuring the written submissions.

As requested by INC-1, written submissions will inform the secretariat in the preparation of a document with potential options for elements towards an international legally binding instrument, for consideration at the second session of the INC, without in any way prejudging what the committee might decide regarding the structure and provisions of the instrument. The document is to be based on a comprehensive approach that addresses the full life cycle of plastics as called for by UNEA resolution 5/14, including identifying the objective, substantive provisions including core obligations, control measures, and voluntary approaches, implementation measures, and means of implementation. The template below is meant to assist Members and Observers to prepare their written submission as a guide. A number of documents prepared for INC-1 are of relevance, notably UNEP/PP/INC.1/5 on 'Potential elements, based on provisions in paragraphs 3 and 4 of United Nations Environment Assembly resolution 5/14, including key concepts, procedures and mechanisms of legally binding multilateral agreements that may be relevant to furthering implementation and compliance under the future international legally binding instrument on plastic pollution, including in the marine environment'.

The template is divided into three sections:

- I. Substantive elements
- II. Implementation elements
- III. Additional input

All written submissions must be sent to unep-incplastic.secretariat@un.org. The statements received will be compiled and made available the INC webpage.

Please note that it is not required for all fields to be answered in the template for submission.

Deadline for submissions:

- 6th January 2023 for written submissions from observers.
- 10th February 2023 for written submissions from Members of the Committee.

TEMPLATE FOR SUBMISSIONS

Name of country (for Members of the committee)	Sierra Leone
Name of organization (for observers to the committee)	N/A
Contact person and contact information for the submission	Sheku Mark Kanneh Position: Director Email: shekkanneh@gmail.com / sheku.kanneh@epa.gov.sl Mobile: +23278411851 Environment Protection Agency Sierra Leone, Ministry of Environment and Climate Change
Date	13 th February 2023

I. Substantive elements

1. Objective(s)

a) *What objective(s) could be set out in the instrument?*

Proposed Objective:

Through the Ministry of Environment and Climate Change, the government of Sierra is committed to the elimination of Plastic pollution through Long-term, mid-term and short-term measures put in place to avoid the harmful effects of plastic waste on the environment and human health. This can be achieved through plastics life cycle that eliminates negative environmental, social, and economic impacts and supports economic growth and job creation through sustainable development and resource management.

The action aimed at;

- Providing the platform for healthy ecosystems and human settlements, ensuring sustainable consumption and production patterns that recognize strong environmental guiding principles;
- Promoting sustainable production and consumption and circular economy approaches to address plastic pollution, including resource efficiency, product design and reuse that retain plastics in the economy;
- Ensuring waste management hierarchy and the circular plastic economy in Sierra Leone.
- Improving climate through carbon offsetting, carbon emissions, reducing carbon footprint and benefiting from carbon credit financing;
- Ensuring a just and inclusive transition for the industry and its workers in developing countries, and informal waste workers and affected communities and industries;
- Avoiding adverse consequences of the implementation of the legally binding instrument on the climate, biodiversity, and food security;

Explanatory Text:

Plastics containing various chemicals additives which studies have shown to be toxic and can affect the endocrine system. Sierra Leone relies on imported plastic products and packaging – approximately 130,000 tons per annum in 2019 with an estimated import value of \$131 million¹. 89% of the plastics are imported as finished products or packaging. The remainder (approximately 12%) is imported as resins used by domestic manufacturing. The main types of imported plastic packaging products are bottles, and flasks, followed by plastic bags, boxes, and sacks as well as caps and other such items.² A large percentage of plastic waste is attributable to single-use items, such as water sachets, carrier bags, food, and beverage containers, among others. It is widely acknowledged that most waste is not properly managed but instead is discarded as litter, burned openly, disposed in uncontrolled dumpsites, or dumped in waterways or drainage channels. Therefore, to address this challenge among others, the objective of the treaty must be based on a precautionary principle and right to know (transparency) as well as the protection of human right to a healthy environment. With a clear, effective, transparent and ambitious objective, this will provide clear direction to the measures that the convention will have in ending plastic pollution in the spirit of the UNEA 5/14 resolution. The treaty should address the needs of vulnerable and affected communities, particularly the effects of legacy plastic pollution on the environment and the health of people in those communities, and the need for the transformation and transition of existing industries in developing

¹ Anteja report 2021: Sierra Leone Circular Economy in Plastics for Sustainable Tourism and Economic Diversification

² WBG, 2021. Mid Term Progress Report: Plastic Value Chain Mapping Report Sierra Leone Circular Economy in Plastics for Sustainable Tourism and Economic Diversification, prepared by Anteja ECG d.o.o,

countries that will be impacted.

The Plastic industry is crucial to Sierra Leone's economy. Promoting its sustainability can bring new opportunities for innovation and job creation, in line with the objectives of the Sustainable Development Goals (SDGs) and the country's Economic Recovery Growth Plan (ERGP). The Government of Sierra Leone is committed to addressing the Plastic challenges, evidenced in the current move to develop a national plastic waste management policy. The Policy promotes environmental protection, encourages resource efficiency and enhances the conservation of natural resources through sustainable production and consumption of plastics on a cradle-to-cradle approach. Sierra Leone is also quest to adhere to and domesticate treaties and agreements by implementing short-term, mid-term and long-term strategies developed through broad-based national consultations and validation with relevant stakeholders from all sectors.

Accordingly, all forms and sources of plastic pollution are within the scope of the new treaty, coopting climate change and promoting circular economy and sustainable consumption.

Details arising from such discussions, for example, the timeframe of bans, phase-outs and product design standard harmonization, and the range of substances and products for which such measures are applicable, conform with the scope and objectives of the UNEA resolution 5/14 MEA Treaty.

2. Core obligations, control measures and voluntary approaches

a) What core obligations, control measures and voluntary approaches would provide a comprehensive approach to addressing plastic pollution, including in the marine environment, throughout the full life cycle in line with the future objective(s) of the instrument?

Focusing on addressing plastic pollution from a life cycle approach, the following core obligations and control measures need to be included in the future objective of the instrument.

Upstream phase:

In the upstream phase of the life cycle, the key commitment and mechanisms should be in place for polymer production, sustainable consumption and natural capital tracing and conservation

The treaty should capture an article that stipulates the obligations and control measures for;

- Tracking types and volumes of natural capital/plastic feedstock, polymers, processed plastics,
- Tracking the ingredients of plastics (both the polymers and the additives) throughout the supply chain
- Harmonization of plastic product packaging specifications across brands
- Restrict the use of or implement terminal phase out of single-use (e.g. Styrofoam) plastics and/or additives with certain toxic characteristics based on sustainability criteria.

Midstream phase: The treaty should include an article on Product Design and Use specifying the following;

- ✓ Mechanism that prohibits or reduces the production and recycling of contaminated plastics or plastics containing toxic chemicals.
- ✓ Establishing National Waste Management Resource Action Program, Extended Producers' Responsibility for plastic Technology development and transfer and sharing of knowledge across the board (sub-region, regional and global levels)
- ✓ Tracking and transparency on the ingredients of chemicals in plastic products (both polymers and additives)
- ✓ Promoting waste to wealth and resource recovery schemes through the Promotion of appropriate technologies for recycling waste components like plastics, bottles, glass, metals, paper, organic matter, etc. and the establishment of recycling and take back centres at the

state and local level

- ✓ Establishment of product design criteria and plastic contamination limits
- ✓ Ban on waste trade, except where such trade enables circularity (e.g., plastic waste destined for recycling in accordance with the Basel Convention)
- ✓ Labeling and information disclosure requirements on the composition of chemicals in plastic products
- ✓ Harmonizing product design standards and requirements aimed at incentivizing reuse, durability, collection and/or recycling.
- ✓ Controlling plastic waste trade, except where such trade enables circularity (e.g., non-mixed plastic waste, free from contamination and destined for recycling in accordance with the Basel Convention) – including synergies with the Basel Convention and the Bamako Convention for the African region.
- ✓ Establishing mechanisms to implement Extended Producer Responsibility (EPR)
- ✓ Establishing a database of production and producers and providing support for the impacted sectors by implementing the agreement.

Downstream phase: The treaty should include an article on waste management and remediation specifying the following;

- ✓ Promoting environmentally sound management systems for plastic waste in line with resource efficiency by implementing community-based waste-to-wealth business schemes, Managing carbon offsetting and carbon emissions and reducing carbon footprint or benefiting from carbon credit financing.
- ✓ preventing the production and release of toxic emissions from plastics waste management, policies should prevent the following dangerous practices: open burning, incineration, co-firing in coal-fired power plants and waste-to-energy processes, co-processing in cement kilns, and chemical recycling
- ✓ Defining ESM for plastic waste to guide future preventions, moratoriums and investment criteria, for example, to avoid lock-ins to solutions which harm human and environmental health
- ✓ Suitable investments accessible for enhancing local and national capacities.

Sectorial and Source-specific Strategies

In addition to the commitments and control measures addressing each phase of the life cycle, sectorial strategies should be adopted for a specific source of microplastics, fishing gear and agricultural plastics, among others.

Voluntary approaches

Adoption of voluntary pro-environment behaviour in societies (e.g., Education, communication and public awareness campaigns, industry standards, voluntary certification schemes).

II. Implementation elements

1. Implementation measures

- a) *How to ensure instrument implementation at the national level (e.g. role national action plans contribute to meeting the objectives and obligations of the instrument?)*
- b) *How to ensure effectiveness of the instrument and have efficient national reporting?*
- c) *Please provide any other relevant proposals or priorities here on implementation measures (for example for scientific and technical cooperation and coordination as well as compliance).*

There are two main implementation measures that the treaty should adopt as mandatory. These are

- National Action Plans
- National reporting

National Action Plans (NAP): The action plan should include the following elements;

- ✓ Development of national action plans must involve all stakeholders at the national level (including state and Local governments), and parties ensure that Private sector participants, collaborating MDAs, NGOs and CSOs are involved, as well as the most affected and vulnerable populations such as women, waste pickers, among others
- ✓ guidelines approved by the Conference of Parties for developing national inventories and national action plans
- ✓ update to date data on plastics national plastics and plastic waste management system
- ✓ mandatory clause for parties to meet their obligations and set out additional commitments to achieve their national objectives
- ✓ Set out a review process that monitor and evaluates the targets and desired outcomes
- ✓ The time frame for updating/reporting on the road map with clear reporting guidelines and duration.

National Level Reporting: the effort made by parties in accordance with the treaty, to establish mechanisms and responsible bodies to facilitate robust and salient research to expand our knowledge of the status and impacts of plastic pollution, and innovations relevant to strengthening and implementing the treaty's control measures.

Others implementation measures

- ✓ Encourage/fund Research and development of indigenous technological solutions in waste management
- ✓ Develop national guidelines and/or Standard Operating Procedures (SOPs) to implement the global instrument
- ✓ Technology development and transfer and sharing of knowledge across nations

2. Means of Implementation

With respect to means of implementation, document UNEP/PP/INC.1/5 covers the following elements: capacity-building, technical assistance, technology transfer on mutually agreed terms and financial assistance.

a) What measures will be required to support the implementation of the instrument?

On Financial Mechanism:

- Create a financial mechanism similar to the multilateral fund (MLF) model of the Montreal Protocol that provides for predictable, accessible, adequate and timely financial resources and technical assistance, including technology transfer, to least developed countries on a grant and concessional basis, with identified sources and facilitates access modalities, providing a complete package that allows for delivering the global and national goals, operating under the authority of the Parties.
 - ✓ Developed and industrialized countries shall contribute to the Fund established.
 - ✓ The established Fund shall subsidize producer parties lacking handling and recycling/transformation capacities of plastic wastes.
- Provide payment (e.g., grants) or tax concessions to consumers or producers for plastic pollution reduction. For example, dedicating subsidies for recycling plastic waste or recycled content, tax reductions / permit facilitations for industrial activities needed for circularity (e.g., installation of recycling plants).

- Introduction of a levy on the private sector that will fund implementation and remediation
- Ensure access to financing on a concessional basis from multinational financial institutions.
- Promote multilateral cooperation for proper management of this mechanism.

On Technical assistance

- Technical assistance in guiding best practices can support the implementation of policies and programs to eliminate plastic pollution and help build local organisations' capacity.
- Relevant and needed technologies for the phasing down of plastics and the effective implementation of the agreement as identified in the needs assessments by developing countries' action plans and other documents by the secretariat of the treaty should be available for African countries on a concessional and preferential basis.
- Provision of plastic recycling technologies, particularly to plastic manufacturers in African countries, that help reduce plastic pollution by promoting more sustainable raw materials.
- Provision of Capacity building for developing countries to transfer the knowledge, skills, and resources needed to all plastic industry stakeholders.

On Subsidiary bodies

The treaty should establish key subsidiary bodies to support implementation, including:

- A dedicated scientific, technical and socio-economic assessment body operating under the authority of the Parties, similar to the model in the Montreal Protocol
- Implementation Committee to consider and report on non-compliance with the provisions of the treaty reporting and control measures

On other measures

- The treaty should include mechanisms to ensure the resilience of those most vulnerable to the impacts of plastic pollution, including coastal communities in developing countries
- The treaty should ensure just transition pathways for developing countries with plastic and relevant chemicals industries, such pathways should also consider the social and economic aspects related to the implementation of the agreement.

Additional input

Please provide any other relevant proposals or priorities here (for example introductory elements; awareness-raising, education and exchange of information; research; stakeholder engagement; institutional arrangements and final provisions).

To effectively implement the treaty, it is important to conduct widespread public education campaigns to increase awareness and understanding of its goals and objectives. This education should also encourage stakeholders across the plastic value chain to change their behaviours to support the treaty's objectives.

Additionally, to ensure the treaty's sustainability, a self-financing system should be established by implementing an Extended Producer Responsibility (EPR) system at the national, regional, and international levels. This EPR system would place financial responsibility for the treatment and disposal of waste on the producers of the waste, thereby providing a steady stream of funding for the treaty's implementation and enforcement.

Extensive public education to raise awareness of the treaty and encourage behavioural change.

To enhance the agreement's implementation, joint research programs that include developing countries have to be established with a precise aim to provide affordable technologies to transition and replace plastics and harmful chemicals.

Technology transfer on a preferential and concessional basis is crucial for the agreement's implementation. Although, as such, a concrete and practical technology transfer mechanism have to be established, the implementation could be guided by the process established under the Montreal protocol.