

November 11, 2023

Distinguished Chair and Members of the INC,

We represent a group of independent scientists mobilized by the International Science Council, the Scientists' Coalition for an Effective Plastics Treaty, delegates from the Global Council for Science and the Environment, lead authors of the report of the Minderoo Monaco Commission on Plastic and Human Health, Endocrine Society, Food Packaging Forum, Benioff Ocean Science Laboratory at University of California Santa Barbara, and Monterey Bay Aquarium. The International Science Council represents over 245 national scientific academies, regional scientific organizations, international scientific disciplinary unions and associations, and the Scientists' Coalition for an Effective Plastics Treaty has more than 300 individual members from 50 countries. We are raising our voices together at the start of INC-3 to call attention to the lack of a clear and formal platform for independent scientists to contribute their knowledge and expertise to members and the INC process.

An effective instrument on plastic pollution must be informed by, and be responsive to, the best available and most up-to-date scientific evidence and knowledge. This need is well-recognised and undisputed. Indeed, it is mandated by UN Environment Assembly Resolution 5/14, which requires that the INC consider the best available science, traditional knowledge, knowledge of indigenous peoples and local knowledge systems in its deliberations on the instrument. UNEA Resolution 5/14 also stressed the urgent need to strengthen the science-policy interface at all levels.

Numerous peer-reviewed reports evidence the significant scientific consensus regarding the detrimental impact of plastic pollution on human health and the environment, and there is ample research, real-world experience, expertise, and knowledge of all kinds for the INC to develop the text of the instrument and its annexes. In addition, interventions must be evaluated and guided by independent science to minimize the risk of regrettable alternatives and substitutes.

We stress that application and operationalisation of the precautionary principle is critical to ensure that the instrument's objective is achieved. UNEA Resolution 5/14 mandates that the INC take into account the principles of the Rio Declaration on the Environment and Development, which include the precautionary principle. In affirming the precautionary principle - that lack of full scientific certainty shall not be used as a reason to postpone effective (including cost-effective) measures to prevent further detrimental impacts to the environment, and human health, and human rights - there is implicit recognition of the ongoing emergence of science, data, insights and knowledge. This recognition too must inform all decisions, including those that establish the institutional framework for implementation and mechanisms for review and amendment, such that the instrument remains responsive to the best available science and knowledge as that evolves.

The scientific community represented by the undersigned bodies has repeatedly indicated readiness and preparedness to respond to the needs of delegates and has respectfully

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requested that delegates work with the INC Secretariat to define participation of independent science clearly in the INC process, including the intersessional period.¹

We express concern that as the midpoint of the INC process approaches:

- There is no formal platform for Member States to engage with scientific evidence and other forms of knowledge on targeted questions or for technical expertise; and
- Opportunities for scientific experts and knowledge holders to have clear access and meaningfully participate in the INC process as technical experts (rather than “observers” or interest groups) remain extremely limited under the current process.

We also highlight the need to urgently commence intersessional work and to define clear and appropriate modalities for that work which allow for timely scientific input on technical matters.

For example, intersessional technical work in critical placeholder sections will be important to start now in order to be ready by the end of 2024, such as a range of urgent assessment and monitoring criteria. We highlight that it will only be possible for this work to be informed by the best available science and knowledge if a formal platform for independent scientific, expert and other forms of knowledge into the intersessional process is established.

This could include the establishment of technical working groups and subcommittees comprising independent scientists and knowledge holders from across the range of relevant disciplines and knowledge systems, ensuring regional representation. The formal platform should also facilitate engagement and consultation with the wider scientific community, enabling full and meaningful participation to ensure usable, legitimate and trusted knowledge and solutions. The full and meaningful participation of those most impacted by plastic pollution is particularly key.

Engagement and consultation with the wider scientific community could include delegate-driven question and answer that enable timely responses from the independent science community on questions that are critical to the negotiation of the text. Dedicated consultations with the wider scientific community to test and validate knowledge and proposed solutions and interventions, including via submission processes, will also be important to effectively draw on the widest possible range of timely, credible inputs. A diversity of disciplinary expertise across the natural and social sciences, as well as other knowledge systems such as Indigenous, traditional and local knowledge, are needed to comprehensively tackle the plastic pollution issue.

The formal platform could be supplemented by more informal knowledge exchange mechanisms, for example, webinars and Q&A sessions for delegates that support general knowledge sharing and back and forth exchange.

¹ [INC2 Statement of the International Science Council, the Scientists' Coalition for an Effective Plastics Treaty, and the Global Council for Science and the Environment.](#)

We highlight the importance of establishing an ongoing subsidiary body to provide a dedicated science-policy-society interface and related technical support in the implementation phase. This subsidiary body must have a clear interface with relevant science-policy mechanisms established under relevant multilateral environment agreements as well as the Science Policy Panel on chemicals, waste and pollution prevention being developed pursuant to UNEA Resolution 5/8.

The text of the instrument should enable the creation of such a dedicated subsidiary body, including through establishing financing provisions that will support its effectiveness. Member States should also consider existing models and potential range of functions and principles that should guide the creation of such a mechanism. Expert advisory reports² provide useful background for these discussions and experts and academics on science-policy interface structures and options can be brought in to assist. Lessons from existing mechanisms should be considered to establish a successful mechanism.

In light of our concerns:

We call on the Bureau and the Secretariat to facilitate formal modalities for scientific input into the INC process (including intersessional work), guided by the principles of effective science-policy interfaces. The modalities that are established for scientific input should enable the best available and independent scientific information to inform the process in an agile and timely manner.

We urge Member States to work with Bureau members to ensure that independent science is brought more strongly into the INC process (including intersessional work), by

- Mandating the INC Secretariat to establish a formal platform for engagement between Member States, scientists and other knowledge holders in the INC process. We recommend that this formal platform facilitate a two-way dialogue between delegates, scientists and other knowledge holders, supporting the joint framing of policy questions and challenges and identification of areas in which scientific and knowledge-holder input is needed.
- Require intersessional technical work to begin on critical assessment and monitoring criteria.
- Defined modalities for independent and interdisciplinary scientific and other knowledge holder input into that technical work as part of the mandate for intersessional work between INC-3 and INC-4 and thereafter.

²See: International Science Council, 2023. ISC Policy Brief: Creating a strong interface between science, policy and society to tackle global plastic pollution. Paris, International Science Council. <https://council.science/publications/plastic-pollution-policy-brief/>; also: GRID-Arendal (2023). *Science-policy interface for plastic pollution*. GRID-Arendal. Arendal. Karen Raubenheimer, Niko Urho. <https://www.grida.no/publications/1007>

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- Including independent scientific expertise and representation of Indigenous and traditional owner groups on their delegations and providing funding for the participation of those lacking resources.

Thank you for your attention to our concerns and requests.

Signed:

The independent group of scientists mobilized by the International Science Council, the Scientists' Coalition for an Effective Plastics Treaty, delegates from the Global Council for Science and the Environment, lead authors of the report of the Minderoo Monaco Commission on Plastic and Human Health, Endocrine Society, Food Packaging Forum, Benioff Ocean Science Laboratory at University of California Santa Barbara, and Monterey Bay Aquarium in support of the INC process.