

The Honorable Wilbur Ross
Secretary
U.S. Department of Commerce
1401 Constitution Ave., N.W.
Washington, DC 20230

Dear Secretary Ross:

We are writing to support the Administration position in the Organization for Economic Cooperation & Development (OECD) objecting to the adoption of new restrictions on trade in end-of-life plastics.

The Environmental Technologies Trade Advisory Committee (ETTAC) is a Federally-established committee whose purpose is to advise on the policies and procedures of the U.S. government that affect environmental technology exports. In this capacity, we especially appreciate the opportunity to provide our comments on marine litter, end-of-life plastics and appropriate options to address the issue.

We appreciate the Administration's letter to the OECD— signed by U.S. EPA Administrator Andrew Wheeler on July 3 – formally objecting to the OECD's automatic adoption of new restrictions on trade in end-of-life plastics that were recently adopted by parties to the *Basel Convention on the Control of Transboundary Movements of Hazardous Waste and their Disposal*.

As you work with EPA, USTR and State, we wanted to underscore the role of responsible collection, handling, processing and consumption in diverting these valuable materials from pollution or disposal. Placing trade restrictions on these materials may actually have the perverse effect resulting in more plastic litter heading to the ocean, as developing countries with insufficient waste management infrastructure will not be able to easily export their plastics, which will require going through a cumbersome consent process.

Furthermore, the Basel Convention's purpose is to ensure the responsible movement of hazardous waste, and the decision taken to impose restrictions on recovered plastics fails to acknowledge that plastics are not waste but valuable, recyclable commodities that are available to be processed into new, economically- and environmentally-friendly manufacturing inputs for new products. Developing new value-add supply chains based on recycled plastics will also generate jobs, economic development and opportunities for increased exports of environmentally-friendly U.S. technologies and goods.

We recommend that the U.S. advance efforts in the OECD to support creation of robust waste management infrastructure in countries that have insufficient collection, handling, processing and consumption processes. In fact, the U.S. Mexico Canada Agreement (USMCA) has important provisions, including Article 24.12, that call for trilateral cooperation to address primary causes of marine plastic litter, which include lack of a modern solid waste management infrastructure and individual behaviors, such as littering, that cause plastic bottles and other discarded plastics to end up in oceans and other bodies of water. Building on these provisions, the U.S. could advance efforts to significantly improve waste management and address the root causes of pollution in the marine environment.

A majority of the OECD members have robust recycling and disposal infrastructure, as well as mature manufacturing industries that require recycled plastic content. Therefore, discussions in the OECD could focus efforts on best practices and cooperation with countries that lack sufficient waste management infrastructure to address the cause of improperly disposed plastics. These discussions could also help

leverage a wide range of existing programs and efforts to promote effective waste management while enabling economic and environmentally friendly innovation.

We value your commitment to these issues and look forward to working closely with you to adopt and promote responsible policy globally. To that end, we are developing further, more detailed recommendations which we will provide to you shortly.

Sincerely,

A handwritten signature in black ink, appearing to read 'W. Decker', with a long horizontal flourish extending to the right.

William Decker
ETTAC Chair

Cc: Ambassador Robert Lighthizer
Administrator Andrew Wheeler
Secretary Michael Pompeo