19. 04. 2021

Marcos Orellana,

U.N. Special Rapporteur on toxics and human rights.

Dear Sir,

**Submissions on “The lifecycle of plastics and human rights”**

The Centre for Environmental justice would like to share few studies conducted on this regard to consider in your report.

1. Brand Audit 2019- Sri Lanka March 2020 Breaking the Plastic Cycle In Asia: <https://ejustice.lk/wp-content/uploads/2020/09/Sri-Lanka-Brand-Audit-2019-CEJ.pdf>

This report is based on self-reported data of 12 brand audits around the country. It was found that the most common plastic polluter in audited locations was plastic packaging. Among the rest included; yoghurt cups, bottles, tooth brushes, yoghurt spoons, bottle caps, disposable cups, shopping bags, lunch sheets, Jelly cups, transparent spice packets, plastic straws, fishing nets, Styrofoam boxes, apple wrappers, lunch boxes, cigarette butts etc. This indirectly relate the need of alternatives for these uses.

The Elephant house brand toped among the brands found during this brand audit. Coca Cola, Cargills, Nestle, and Unilever were the other brands that produces high percentage of single use plastics.

1. Pops Recycling Contaminates Children’s Toys with Toxic Flame Retardants: <https://ipen.org/sites/default/files/documents/toxic_toy_report_2017_update_v2_1-en.pdf>

This study was conducted by IPEN (a global civil society network), Arnika (an environmental organization in the Czech Republic) and several other NGOs including CEJ (Center for Environmental Justice), Sri Lanka. It revealed the contamination levels of three selected POPs; octabromodiphenyl ether (OctaBDE), decabromodiphenyl ether (DecaBDE), and hexabromocyclododecane (HBCD) in 95 Rubik’s cubes and 16 additional samples (including a thermo cup, hair clips, combs, headdresses, and children’s toys) from 26 Countries.

The study indicates that toxic flame retardants found in e-waste are widely found in children’s toys made of recycled plastic.

1. Plastic chain: <https://youtu.be/fem5ZZZZsQY>

This small video wraps up the plastic cycle with details on production, distribution and legal framework pertaining on plastics in Sri Lanka. It also talks about the vast choices of alternatives to plastics that helps any initiative to replace them emphasizing it’s a mere decision that counts. In managing the plastic cycle, regulations play a major role. Sri Lanka recently published a gazette notification announcing a ban on 3 selected single use plastics (sachets, inflatable toys, cotton buds with plastic stem) and using Polyethylene terephthalate (PET) or polyvinyl chloride (PVC) material for packing agrochemicals used for any process, trade or industry; (Gazette extraordinary No. 2211/51 published on January 21, 2021, to be effected from March 31st, 2021: <http://www.cea.lk/web/images/pdf/2021/regulations/2211-51_E.pdf> ). In addition, there are several regulations set to manage the plastics within the country: Prohibition of polyethylene products of twenty (20) microns or below, Prohibition of polyethylene food wrappers (lunch sheet), Prohibition of high-density polyethylene bags (HDPE), Prohibition of polythene in decorations, Prohibition of polystyrene products, and Prohibition of open burning of plastics/polythene.

1. False solutions to plastic management:

Recycling polythene and plastics or some of the polythene alternatives are not the solution to prevent plastic waste.

On one hand plastic recycling takes back only 2% of the used plastics and around 86% goes to the landfills and oceans (<http://hemanthawithanage.blogspot.com/2017/09/oxo-biodegradable-plastic-is-not.html>). It’s merely a profit lead business than a solution. This article discusses the problems associated with disposing plastics, once they enter the consumer cycle.

One of the solutions presented as an alternative to polythene bags is OXO-BIODEGRADABLE plastic sheets and bags, which is only another harmful than the conventional High-Density Polyethylene sheets (<http://hemanthawithanage.blogspot.com/2017/09/oxo-biodegradable-plastic-is-not.html>). This press release expresses the role of authorities in identifying false alternative materials in order to provide a true solution to polythene pollution.

Should you require further details on links provided, do not hesitate to contact us.

Thank you.

Yours sincerely,

**Centre for Environmental Justice.**