Open letter to European Decision-makers

The European Union (EU) will soon commence voting on the revision of the Waste Shipment Regulation. We, civil society organisations including those from countries receiving plastic waste from the EU, again call on the EU to end plastic waste shipments outside of the Union and European Free Trade Association (EFTA) countries.

We also stand in solidarity with EU countries and communities who, like some of us, bear the negative impacts of plastic waste shipments. We urge the EU to fully transpose the Basel Convention within the Union, in addition to other intra-EU safeguarding procedures to also protect all EU Member States from the impacts of the plastic waste trade.

Pollution from plastic waste exported by high-income, high-consuming countries affects all of us. This waste colonialism must not be allowed to continue.

1. Unjust job creation in plastic waste recipient countries

Many workers in waste sorting and recycling facilities are migrants or refugees working in squalid conditions that violate environmental and labour regulations, often with insufficient personal protective equipment and access to medical care. Turkey and Malaysia, two of the largest recipients of EU plastic waste, offer examples. At times, communities get locked into unsafe and underpaid jobs, with living spaces polluted by foreign plastic scraps. Farmers who used to cultivate land in Indonesia lament that they are now plastic farmers.

As with the workers, residents living around plastic recycling factories and illegal dumpsites are exposed to toxic emissions – including dioxins, furans, and polychlorinated biphenyls (PCBs) – when residual plastic waste is burnt or when open fires frequently occur at said sites. This exposure increases their risks of contracting serious life-long respiratory, neurological, and reproductive health conditions, and violates their rights to health and a healthy environment.

The EU has gained economically and environmentally by shipping their plastic waste to such regions, regardless of the hazardous working conditions and toxic leakage to nearby communities. This is extremely unjust. Job creation and economic resilience should be rooted in environmental sustainability and safe circularity across all sectors and regions, and create equitable and liveable societies that safeguard the environment for future generations.

2. Poisoning global circularity

The global plastic waste trade is not true circularity as export destinations may not have the infrastructure, capacity, and resources to support safe plastic waste management. Even when recycling is feasible, these operations can result in a “circle of poison” rather than a circular economy as toxic chemicals are recycled into new toxic products.

Laws have been passed around the world (e.g. Basel Convention) to address the waste trade and promote environmental justice. Yet, the plastic waste trade has led to increasing waste crimes, including corruption, waste trafficking, illicit dumping and burning. As it stands, current international law and recipient country measures alone are insufficient in combating this. The EU must enforce adequate policies that also protect others from the illicit trafficking of EU plastic waste – a plastic waste export ban is one of them.

Additionally, plastic waste exports have been shown to correlate with expanding global virgin
plastic resin production, helping to perpetuate single-use throwaway culture in major high-income exporting countries. Linked to this, far from mitigating the climate crisis through material circularity, plastic waste exports and the open burning of the unrecyclable fractions of exported waste release greenhouse gases and toxic additives into the environment, thus exacerbating climate change.

The biggest exporters of plastic waste are also the biggest consumers of plastic, including countries in the EU. The EU should reduce plastic production, consumption, and waste, rather than finding offshore hiding places for it. True circularity requires systemic change and upstream design measures that reduce waste at source and dependency on virgin materials.

3. Harming domestic waste management

When there is insufficient domestic plastic waste recycling capacity, plastic waste imports displace and undermine domestic waste collection, sorting, and recycling. This pushes domestic plastic waste treatment further down the waste hierarchy in recipient countries, increasing waste mismanagement.

In exporting countries, the shipment of plastic waste avoids a full internalisation of the costs of plastics by exporting negative environmental, human health, and economic externalities to other countries, thus removing market incentives for proper preventative waste management. Pollution and responsibility are traded off together with the waste, and local communities in destination countries and their environments pay the price.

The EU should never engage in exploiting others to bear the responsibility of their waste treatment in the name of free trade, especially weaker economies that have less ability to manage imported waste in addition to their own. Effective waste management should be based on the principles of proximity and the least transboundary movement of waste.

4. Time to end plastic waste exports

Plastic pollutes throughout its lifecycle and far too often, waste exports end up in weaker economies. This linear and exploitive flood of waste to less affluent nations must end now. Plastic waste should instead be managed through prevention mandates and a lifecycle approach. Exporting your problem is clearly not the answer.

The EU/EFTA is one of the wealthiest bloc of nations in the world, yet it externalises the costs and responsibilities of its waste. Nevertheless, recipient countries of EU plastic waste have already started to say no – China (historically, the largest importer) banned imports in 2018 and since then, more recipient countries are putting in place import restrictions of their own. Most recently, Thailand’s plastic waste and e-waste subcommittee agreed to a phased import ban by 2025.

We stand in solidarity with non-EU countries and EU Member States that face the brunt of this trade. With this opportunity of a new revised Waste Shipment Regulation, the EU must:

1. End exports of plastic waste of all kinds to countries outside of the EU/EFTA trade area.
2. Enforce adequate intra-EU safeguarding measures, including existing Basel Convention obligations.
Malaysia
1. Mageswari Sangaralingam, honorary secretary, Sahabat Alam Malaysia (Friends of the Earth)
2. Mohideen Abdul Kader, president, Consumers' Association of Penang
3. Pua Lay Peng, secretary, Kuala Langat Environmental Action Association
4. Wong Ee Lynn, coordinator, Malaysian Nature Society Selangor Branch Green Living Special Interest Group
5. Lee Jing, honorary secretary, Environmental Protection Society Malaysia
6. Sivaranjani, secretary, Environment Association of Klang
7. Hema Sulakshana Mahadevan, Public Engagement Campaigner, Greenpeace Malaysia
8. Individual: Tan Yang Sheng, lecturer at Universiti Tunku Abdul Rahman (UTAR)
9. Individual: Suhaizam Mohd Kassim, technical manager, member of Gabungan Lestari Alam Sekitar Kuala Langat
10. Individual: Lim Lianchuan, army retiree, member of Environment Association of Klang
11. Individual: Emily Tan, land agent, member of Environment Association of Klang
12. Individual: Dr. Farhan Nasa, medical doctor, member of Malaysia Stop Waste Trade Coalition
13. Individual: Gary Tan, traditional and complementary medical practitioner

Thailand
14. Premrudee Daoroung, coordinator, Project SEVANA South-East Asia
15. Penchom Saetang, director, Ecological Alert and Recovery - Thailand (EARTH)
16. Individual: Arm Punyathorn, environmentalist

Vietnam
17. Individual: Xuan Quach, Vietnam country program coordinator, member of Pacific Environment
18. Individual: Trương Thị Hải Yến, student, Vietnam Zero Waste Alliance
19. Individual: Pham Phuong Thao, environmental activist
20. Individual: Huong Thi Thu Huynh, office staff
21. Individual: Nguyễn Xuân Thanh, teacher, Dong Ngac Primary School

India
22. Individual: Priyanka Joshi, program manager, member of Parisar

Pakistan
23. Ali Amjad, manager - youth leadership program, Lahore Conservation Society

Bangladesh
24. Syeda Rizwana Hasan, chief executive, Bangladesh Environmental Lawyers Association (BELA)
Türkiye
25. Sedat Gundogdu, lead researcher, Microplastic Research Group

Mexico
26. Gustavo Castro Soto, general coordinator, Otros Mundos Chiapas/Amigos de la Tierra México
27. Marisa Jacott, director, Fronteras Comunes
28. Larisa de Orbe, president, Acción Ecológica México / director, Red Mexicana de Acción Ecológica
29. José Manuel Arias Rodríguez, president, Asociación Ecológica Santo Tomás, AC

Ecuador
30. Andrea Lema, directora general, Fundación PlastiCo. Project

Colombia
31. Tatiana Rodríguez Maldonado, general coordinator/political scientist with a master's degree in communication, Censat Agua Viva

El Salvador
32. Laura Mejía, bachelor's degree in social communication, CESTA Friends of the Earth El Salvador
33. Ricardo Navarro, chairman, CESTA FOE El Salvador
34. Individual: Ana María Vásquez, comunicadora social, member of CESTA Amigos de la Tierra El Salvador

Brazil
35. Valéria Nacif, coordenitar, ODESC Organização de Desenvolvimento Sustentável e Comunitário
36. Zuleica Nycz, director, Toxisphera Environmental Health Association
37. Individual: Ana Sackl, university teacher, FURB Universidade de Blumenau
38. Individual: Marcelo Alves de Souza, professor, Universidade Federal de Minas Gerais

Argentina
39. Natalia Salvatico, coordinator, Tierra Nativa

Chile
40. María José García Bellalta, commercial management/arquitect, Fundación El Árbol
41. Alejandra Parra, Red de Acción por los Derechos Ambientales RADA
42. Individual: B.Margot Ojeda, agronomist

Uruguay
43. Alberto Villarreal, general coordinator ATALC-Justicia Económica y Resistencia al Neoliberalismo, REDES-FOE Uruguay

Costa Rica
44. Alejandra Porras, Projects’ Director, COECOCeiba
Haiti
  45. Aldrin Calixte, executive secretary, Haiti Survie

Nigeria
  46. Tom Aneni, executive director, Sustainable Environment Development Initiative (SEDI)
  47. Ubrei-Joe Maimoni Mariere, program manager, Environmental Rights Action/Friends of the Earth Nigeria (ERA/FoEN)

Tanzania
  48. Ana Rocha, executive director, Nipe Fagio

Cameroon
  49. Gilbert Kuepouo, executive director, CREPD

Uganda
  50. Betty Obbo, chemicals management and gender desk officer, Bio Vision Africa

Tunisia
  51. Individual: Yasmine Ben Miloud, climate change activist

Zimbabwe
  52. Individual: Mikhail Aruberito, zero waste campaigner

Senegal
  53. Aminata Farima Tidjani, project coordinator, Zero Waste Senegal
  54. Armel Lamba, in charge of digital communication, Zéro déchet Sénégal

South Africa
  55. Susanne Karcher, co-founder, African Circular Economy Network (ACEN)

Poland
  56. Paweł Głuszyński, project coordinator, Society for Earth (TNZ)
  57. Tomasz Wojciechowski, coordinator, Instytut Gospodarki o Obiegu Zamkniętym (IGOZ)
  58. Joanna Kądziołka, Polish Zero Waste Association

Ukraine
  59. Anastasiia Martynenko, head, Zero Waste Society

Romania
  60. Alexandra Ghenea, vice president, Ecoteca
Germany
61. Marie Delaperrière, board member, Zero Waste Kiel
62. Samuel Höller, general manager, a tip: tap e.V.
63. Johanna Hausmann, senior policy advisor, WECF
64. Carla Wichmann, coordinator, Exit Plastik

Netherlands
65. Maria Westerbos, director, Plastic Soup Foundation

Spain
66. Carlos Arribas Ugarte, Área de residuos de Ecologistas en Acción (España)

France
67. Muriel Papin, general manager, No Plastic in My Sea
68. Condamine Pierre, overproduction campaigner, Amis de la Terre France / Friends of the Earth France

Ireland
69. Emma Jayne Geraghty, head of movement building, Friends of the Earth Ireland
70. Orla Coutin, researcher/admin, Zero Waste Alliance Ireland (ZWAI)

Italy
71. Franco Borgogno, environmental projects coordinator, European Research Institute

Hungary
72. György Szabó, zero waste program manager, Humusz Szövetség

Austria
73. Anna Leitner, campaigner for resources and supply chains, GLOBAL 2000 - Friends of the Earth Austria

Finland
74. Tanja Pulliainen, chairperson, Friends of the Earth Finland

Catalonia
75. Moisès Company, president, Associació Mediambiental Valdelges.net

United States
76. Jan Dell, independent engineer, The Last Beach Cleanup
77. Dianna Cohen, CEO and co-founder, Plastic Pollution Coalition
78. Jackie Nuñez, founder, The Last Plastic Straw
79. Jim Puckett, executive director, Basel Action Network

Europe
80. Meadhbh Bolger, resource justice campaigner, Friends of the Earth Europe
81. Piotr Barczak, European Environmental Bureau
Global

82. Sirine Rached, global plastics policy coordinator, Global Alliance for Incinerator Alternatives
83. Sam Cossar, program coordinator, Friends of the Earth International
84. Ana Hristova, global campaign strategist, Greenpeace International
85. Lauren Weir, senior ocean campaigner, Environmental Investigation Agency
86. Krista Shennum, fellow, Human Rights Watch
87. Plastic Waste Campaign Team, Greenpeace Mediterranean

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