

## 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.

## Signatories

### 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 \(TNZ\)](#)

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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, [WECEF](#)
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 \(ZWA\)](#)

## 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 Valldelges.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

*As of 28 October 2022*