



Monitoring trade in plastic waste and scrap (2026)

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General Comments

- A key takeaway from the paper is the continued movement of waste between OECD and non-OECD countries. At this point, it is crucial to determine whether these shipments are taking place legally or illegally, as this distinction is essential for designing targeted regulatory or enforcement measures. This question is especially pertinent when examining plastic-waste imports from countries that have not ratified the Ban Amendment, since this makes it more difficult to assess whether such trade is occurring under lawful conditions.
- Another concern is the assumption that plastic waste and scrap traded within the OECD is of higher quality than that traded with non-OECD countries, solely based on its higher value per kilogram. While quality may reasonably influence price, it is unlikely to be the only factor. Differences in costs associated with recycling across countries or regions may also drive price variations. Without additional evidence, the analysis risks being incomplete.

Specific Comments

- **Page 4, and para 9, 12, 13, 18, 19, 23, 32, 47:**

- Comment: while highlighting shipment trends between OECD and non-OECD countries is important, the paper should also clarify which of these shipments occur under legal or illegal conditions. This distinction is crucial to determine whether regulatory frameworks, enforcement mechanisms, or both require strengthening. As per paragraph 19, this would also contribute to understanding whether *«such exports could contribute to plastic pollution in these countries either directly, by generating unrecyclable residues during recycling processes, or indirectly by displacing domestically generated waste from available recycling capacities»*

- **Paragraph 45:** *«Among OECD exporters, Japan remains the top exporter to non-OECD countries, with 0.028 Mt of vinyl chloride waste shipped in 2024»*

- Comment: as reminded under paragraph 44, *«export volumes began to recover in 2023, and the continued rise in 2024 suggests a gradual rebound in trade flows of vinyl chloride waste to non-OECD countries despite bans on such trade in the context of the Basel convention»*. The paragraph implies that these shipments would be illegal because the Basel Convention bans are already in force. However, it does not clarify that this does not apply to countries that have not yet ratified the Ban Amendment, which creates ambiguity about whether this particular case involves an enforcement problem or simply reflects the current legal status of the parties involved.. Please also refer to paragraph 47, bullet point 5 *«Increasing vinyl chloride trade despite restrictions»*



- **Paragraph 6, box 1.2:** *«Exporters may also potentially categorise plastic waste and scrap not as “waste”, but as a primary form or “recycled” product (e.g. after having gone through some form of processing). This volume would not be reported under HS 3915».*
 - Comment: this paragraph creates confusion. Exporters may not categorize re-processed waste under the HS codes mentioned in the box because it may have already stopped being waste, and reached its End-of-Waste status. It should highlight the lack of a specific HS code for re-processed/recycled plastic coming from waste, that has reached its EoW status, as well as the lack of harmonized interpretation of when plastic waste reaches its EoW status
- **Page 4 (third bullet point), paragraph 35, 36, 47:** as per general comment, the paper takes for granted that higher prices for plastic waste and scrap traded within OECD vs non-OECD is only due to differences in quality, without considering other potential elements. The potential existence of other related elements (e.g., recycling costs ?) should be at least mentioned in the document.