

EFFECTIVENESS OF NATIONAL ACTION PLANS



Mountain of Plastic Bottles (Thilafushi, Maldives)
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National Action Plans (NAPs) are commonly used by countries to deliver national obligations or contributions to international environmental agreements. NAPs are identified as a possible implementation vehicle of the Global Plastics Treaty in the 'Potential Options for Elements' document (UNEP/PP/INC.2/4). **This policy brief examines the factors that support effective NAPs.** The analysis is based on evidence from peer-reviewed articles on various NAP approaches, expert interviews, submissions from nations to the 'options' paper ahead of INC-2, and written and verbal contributions to INC-1. **The analysis shows that:**

1... NATIONAL ACTION PLANS THAT ARE UNCOORDINATED, UNMONITORED, AND NON-BINDING ARE LESS EFFECTIVE.
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2... YET, NATIONAL ACTION PLANS ARE UNDER CONSIDERATION FOR INCLUSION IN THE GLOBAL PLASTICS TREATY.
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3... IN ORDER TO MAXIMISE THEIR EFFECTIVENESS, PLASTICS NATIONAL ACTION PLANS SHOULD:

- be legally binding, supported by national legal and institutional frameworks.
- have stringent compliance measures to ensure national commitments are met.
- have robust monitoring, evaluation, reporting, and sharing of data.
- be revised frequently to incorporate new knowledge and adapt to policy successes or failures.
- be supported by technical and financial assistance to ensure successful implementation and compliance.
- include national targets and implementation measures aligned to the global treaty.

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BACKGROUND & UNDERSTANDING: National action plans

The use of NAPs to deliver national commitments under the global plastics treaty was advocated by some parties during the first intergovernmental negotiating committee (INC-1) in November 2022, yet nations remain divided on this approach. The prevalence of NAPs stems from their potential as catalysts of action that facilitate coordination between and within national governments, converting global or regional commitments to national action. Similar approaches are found in existing international or multilateral agreements such as the Paris Agreement and Stockholm Convention. However, the adoption of NAPs does not always guarantee effectiveness as they often rely on voluntary commitments and lack enforcement mechanisms [1,2].

1 Uncoordinated, unmonitored, and non-binding national action plans are less effective

Plastic pollution NAPs that incorporate all relevant stakeholders, sectors, and lifecycle stages present an acute challenge. In other international environmental agreements with collective targets, the impact of NAPs and similar approaches has been severely hampered by:

- Uncoordinated efforts, definitions, and metrics [2,3];
- Mandates requiring the production of NAPs but which do not specify their content [3];
- Unmonitored implementation and a lack of accountability resulting in uncertain effectiveness [2,3]; and
- Lack of transparency, funding, and legislative support for NAP objectives [2,4]

Most government-delivered plastic pollution NAPs have been published relatively recently (after 2017) and lack consistent data collection and monitoring, which means there is very limited evidence to evaluate their effectiveness [2]. Thus, little evidence exists as to whether NAPs can simultaneously curb nation-specific plastic pollution while effectively contributing to global action to tackle plastic pollution. Applying NAPs with uncertain effectiveness and a lack of monitoring is problematic. **There are two particular risks of applying NAPs:**

Low-ambition and isolated actions can result in collective action that fails to meet global goals [5]

Actions in NAPs are based on internationally inconsistent baselines and monitoring metrics, making progress difficult to validate [2,6]

Whilst the adoption of NAPs with voluntary commitments or lacking enforcement mechanisms has been identified as ineffective in other international or multilateral agreements [1], they have been widely supported in early discussions in INC-1. Altogether, 67 nations and international groupings contributed to the *'Potential Options for Elements'* document. These submissions indicated a strong preference towards NAPs, with 85% of submissions supporting NAPs (Table 1). Despite this support for NAPs, the lack of evidence of their effectiveness in tackling plastic pollution remains an issue warranting more scrutiny. This uncertainty was recognised by some nations whose submissions included suggestions for more effective action plans, including regular and mandatory monitoring, stakeholder consultations, and globally agreed timelines for NAP production and review.

Table 1. Support for NAPs, as expressed in the 67 nations' and international groupings' submissions to the UNEP INC Secretariat for the *'Potential options for elements'* UNEP paper (February, 2023).

Country Classification	Total Submissions	National support for NAPs expressed in submissions
High income countries	17	17 (100%)
Upper-middle income countries	20	15 (75%)
Lower-middle income countries	16	14 (87.5%)
Low-income countries	7	6 (85.7%)
Unclassified*	7	5 (71.4%)
Total	67	57 (85.1%)

* Including country groups and alliances

Of the 67 nation submissions, 61% were made by high and upper-middle income countries. The primary justification for a NAP approach in the submissions was that implementation can be tailored to national circumstances. Hence, NAPs would be convenient and contextually relevant for each nation. In addition, the prominence NAPs in the 'options' paper may, in part, be due to their inclusion in the template for national submissions to the UNEP, which may have served to lead responses towards NAPs.

To maximise the effectiveness of NAPs, there is evidence to suggest that the following six enablers are needed:

KEY ENABLER #1 NAPs should be legally binding, supported by national legal and institutional frameworks.

Having legally binding NAPs provides a mechanism to hold countries accountable for their commitments, establishes a level playing field and prevents some countries from evading their responsibilities while others take significant actions. Legal obligations help to ensure that countries continue their actions beyond short-term political cycles, providing greater certainty and continuity in addressing plastic pollution. A mandatory element within NAPs could be for nations to devise a legal and institutional framework to facilitate NAP implementation.

KEY ENABLER #2 NAPs should have stringent compliance measures to ensure national commitments are met.

The delivery of a NAP should not be the sole mandatory requirement of nations under the treaty, but should indicate how nations will comply with treaty requirements, in their national context. The treaty could define a selection of measures linked with its objectives, which would form a foundation for NAP actions and commitments (see Key Enabler 4), while driving national progress. Furthermore, a compliance mechanism is needed to ensure that commitments presented in NAPs are met to avoid NAPs simply remaining as 'paper policies' with little impact. The compliance and delivery of NAPs must be supported by robust monitoring and effectiveness evaluations at the national and global levels (see Key Enabler 3). Compliance mechanisms could take the form of penalties for non-compliance, or incentives for compliance.

KEY ENABLER #3 NAPs should have robust monitoring, evaluation, reporting and data sharing.

Accountability requires full transparency and disclosure. Consistent mandatory national monitoring and reporting is critical to achieving effective NAPs. There should be a globally agreed baseline and a timeline against which to assess progress. A transparent mechanism for the assessment of national actions, based on standardised and periodic reporting and peer review, is recommended. Self-reporting is unlikely to be sufficient. Therefore, a dedicated independent review committee might be necessary, similar to the Compliance Committee of the Aarhus Convention. Reporting by both governments and the private sector should be well communicated and open access to increase transparency and allow lessons to be widely shared.



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KEY ENABLER #4 **NAPs should be revised frequently to incorporate new knowledge and adapt to policy successes or failures.**

Experiences of measures implemented through NAPs, including legislation, regulations, and policies, should be shared amongst nations to allow for collaborative learning and adaptation (see Key Enabler 3). NAPs should function as living documents and be regularly revised, using the lessons learned from other countries. NAPs should have progressive staged targets as developments in capacity, infrastructure, technology, and innovation allow for improved plastic pollution reduction. Increasing ambition is strongly linked to the principle of non-regression, urging nations to sustain and enhance progress.

KEY ENABLER #5 **NAPs should be supported by technical and financial assistance to ensure successful implementation and compliance.**

Technical and financial assistance will support the implementation of NAPs, especially for nations with limited capacities. This includes: 1) technical assistance for NAP implementation and compliance; 2) guidance and tools to support national target setting and delivery; and 3) support for data collection to ensure alignment of standards and methodologies. Support could be provided through an expert science-policy group in collaboration with international development organisations. A financial mechanism, potentially based on the polluter pays principle, will offset the risk of low-ambition NAPs. NAPs should specify financial and technical arrangements at the national level, including identifying technology transfer needs and offers.

KEY ENABLER #6 **NAPs should include national targets and implementation measures aligned to the global treaty.**

Global goals generate a shared sense of what we are working towards and by when, which is critically important. Global goals, supported by nested national, regional, sector, or solution-specific targets can be a rallying call for, and a measure of, internationally consistent action. NAPs can be effective country-driven instruments for implementation as they recognize national circumstances and link them with the core obligations and goals of the treaty. However, NAPs should be coordinated at the global level rather than being disconnected individual plans.



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CONTRIBUTOR INFORMATION

Based at the University of Portsmouth, UK, the **Global Plastics Policy Centre** is an independent knowledge broker to support effective plastics policy-making in government and the private sector. The Centre provides evidence-based support at the interface of government, businesses, citizens, and researchers, including supporting the process to develop a legally binding instrument to end plastic pollution.

Dalhousie University, Canada, has been at the forefront of plastic pollution and plastic policy research which is led by Dr. Tony Walker with support from students, including Hunar Arora. They participate in roundtables and provide policy advice to help Canada develop effective policies to curb plastic pollution (e.g. Ocean Plastics Charter for Canada's 2018 G7 presidency, the Canadian Plastics Science Agenda, and roundtables leading up to INC-1 and INC-2 negotiations).



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ABOUT THIS POLICY BRIEF

This policy brief is based on findings from over 25 scientific articles, 174 stakeholder and all 67 member nation and international grouping submissions to the INC-2, analysis of statements made during INC-1 (see [Environmental News Bulletin Reports](#)), and NVivo analysis of 10 expert interviews engaged in the negotiations process. Evidence was reviewed and analysed by the authors. Data, detailed methods, and the full reference list are available upon request. The work of the Global Plastics Policy Centre to support the negotiations of the legally binding instrument to end plastic pollution is funded philanthropically by the Flotilla Foundation. For more information, please contact globalplastics@port.ac.uk

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