

# Summary of Steering Committee Consultation Feedback

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The Steering Committee provided valuable feedback during the consultation process for the Plastic Pollution Mitigation Action Framework (PAF). Their input helped refine the conceptual clarity of the framework, strengthen the methodological guidance, and improve the usability of the tool for practitioners.

Special thanks to the module reviewers:

- Katie Powell, Anthesis Group
- Julien Boucher, EA - Earth Action
- Laura Peano, Quantis
- Juan Pablo Trespalacios Miranda, Systemiq
- Daniel Habesland, WWF

Below is a summary of the main themes raised and how they were addressed in the final version of the framework.

## **Introduction**

Several reviewers encouraged strengthening the introduction to more clearly articulate why companies should adopt the PAF and how it fits within the broader sustainability and reporting landscape. In particular, reviewers noted that companies often look for a clear business case and alignment with existing reporting obligations.

### **Technical team response:**

The introduction was expanded to better explain the role of the PAF as the missing action-accounting layer for plastic leakage mitigation, complementing existing circularity and footprint measurement tools. Additional content highlights the business case for plastic mitigation accounting and clarifies how the framework connects with existing reporting and regulatory initiatives such as EPR schemes, PPWR, and broader ESG disclosure frameworks.

## **Pillar A – Attributional mitigation actions**

Some reviewers indicated that the distinction between Pillar A actions and other interventions could be difficult to interpret, particularly regarding actions implemented outside a company's direct operations but still linked to its value chain. Questions also arose regarding accounting boundaries and attribution rules.

### **Technical team response:**

The framework was revised to clarify that Pillar A actions represent attributional reductions in a company's own plastic footprint, even when interventions take place outside the company's direct operations. Additional explanations and examples were added to illustrate how actions affecting the management of a company's products or materials within its value chain remain attributable to that company. Further guidance was also included on accounting boundaries and attribution methods, particularly when companies participate in shared systems or infrastructure.

## **Pillar B – Systemic mitigation actions**

Reviewers raised questions about the distinction between actions that occur within a company's value chain versus those that influence broader systems, and how such interventions should be categorized within Pillar B. Some examples in the framework were perceived as potentially ambiguous, especially when the same action could be implemented internally or externally.

### **Technical team response:**

Additional explanations and examples were introduced to clarify the distinction between systemic interventions within the value chain and those affecting broader systems. The framework also clarifies that the classification depends on whether an intervention reduces the company's own footprint (attributional) or instead contributes to system-wide change beyond the company's direct footprint. In cases where actions generate both types of impacts, guidance was added to allow for split attribution across pillars.

## **Pillar C – Plastic recovery**

Feedback highlighted the need to clarify how plastic recovery actions are framed within the framework and how their role compares to prevention actions.

### **Technical team response:**

The framework was updated to more clearly state that plastic recovery addresses plastic that has already leaked into the environment and therefore does not prevent leakage. Clarifications were also made to the presentation of supporting research to ensure the prioritization of mitigation actions remains consistent with scientific analyses, which emphasize prevention and reduction as the most impactful strategies.

## **Recycling and Circularity**

A potential confusion around the relationship between circularity strategies (such as recyclability improvements or recycled content) and leakage mitigation was noted. Reviewers emphasized that circularity improvements do not always directly translate into reductions in plastic leakage.

**Technical team response:**

The framework now clarifies that circularity actions are only counted as mitigation actions when they demonstrably contribute to reducing leakage risk, depending on the local waste management context. Additional explanations were introduced to better articulate the complementary roles of circularity metrics and leakage accounting, and to ensure that users understand when such actions qualify as mitigation under the PAF.

**Prioritization and Target Setting**

Some reviewers pointed out that while the framework presents a hierarchy of mitigation actions, it does not yet provide detailed guidance on how companies should allocate efforts across different types of interventions.

The framework clarifies that the prioritization logic is informed by existing scientific analyses on plastic pollution mitigation. However, translating these system-level insights into corporate-level target setting and weighting guidance is identified as a future step in the development of the methodology.

**Additionality and Double Counting**

Reviewers emphasized the importance of ensuring that mitigation actions generate additional impact and that reductions are not counted multiple times when several actors participate in the same intervention.

**Technical team response:**

Additional guidance was introduced to clarify additionality principles and attribution rules, particularly for collaborative or co-funded interventions. The framework now provides clearer direction on how impacts should be allocated among multiple actors to avoid over-claiming.

**Data and Implementation Guidance**

Some reviewers recommended providing additional information to support practitioners in applying the framework in practice, particularly regarding data requirements and eligibility criteria for mitigation actions.

**Technical team response:**

The framework now includes expanded explanations on data quality, accounting boundaries, and eligibility conditions for mitigation actions. References to existing PFN resources and datasets were also added to help users access relevant data for leakage accounting.

## **Environmental Trade-offs and Scope**

Reviewers also noted that some mitigation actions could potentially create trade-offs with other environmental impacts, and suggested clarifying the scope of the framework with respect to indirect interventions such as behavior change campaigns.

### **Technical team response:**

The framework now more clearly encourages users to consider cross-impact trade-offs, such as climate or land-use impacts, when evaluating mitigation actions. It also clarifies that the PAF focuses on corporate-led interventions with measurable effects on material flows, while behavioral initiatives are only included when their impact on plastic flows can be quantified.