

## Open Letter to Ocean Conservancy regarding the Report “Stemming the Tide”

October 2, 2015

We, in the environmental, health, climate, and social-justice movements from the Asia-Pacific region, are deeply concerned about the recent report “Stemming the Tide” commissioned by Ocean Conservancy.

We are writing this open letter to Ocean Conservancy to state our response to the recommendations and assumptions made in this report, and to offer an initial technical critique of the technologies and solutions put forth here. This critique is available [here](#). Through this letter, we also want to share our heartfelt reactions to the report.

We are organizations and cities that are working hard to promote local solutions to waste and wasting based on shifting mindsets about how we use our resources, on engaging with communities and governments to create local solutions, and on changing unsustainable systems rooted in an endless cycle of extraction, production, consumption and disposal. We work with our cities and communities to conserve what’s left of our quickly-diminishing natural resources by pushing for proper resource use and management through the reduction of waste and problematic products, redesign, reuse, repair, re-purposing, recycling, composting, and other solutions that make best use of public funds and create opportunities for livelihood and active public engagement.

And we are deeply dismayed and offended that a report aiming to reduce plastics pollution in oceans seems to have missed fundamental facts to support this goal, and is recommending “solutions” that go strongly against and may well dismantle real solutions being implemented in countries mentioned in the report, which so many have worked so hard to achieve.

We share the same concerns that the report’s authors state: there is too much plastic pollution in the world today, not just in our oceans but in our schools, communities and cities. We agree that the plastic menace and the improper disposal of plastic and waste in general are causing massive damage to public health, the environment and the climate. We further agree that there is an urgent need to properly manage waste and plastics in a way that will not further harm human health and already-fragile ecosystems, and cause more irreversible damage to the climate. This need cannot be overestimated.

The report’s foreword states this: *We believe this is the best solution to the problem of plastic waste leaking into the ocean—stopping leakage in the first place, rather than treating it after pollution has already occurred.* This is puzzling to us, because this statement misses what seems to be glaringly obvious: the best solution to reducing plastics going into oceans is to reduce the generation of so much plastic and disposable products in the first place, and to create systems and implement solutions that work toward that goal, not against it. Consumer

goods designed for the dump naturally get dumped, which is why disposable plastics end up in dumpsites, landfills, waterways, and the oceans.

We agree that the focus should be on land-based solutions to prevent plastics from entering waterways, yet the recommendations in this report do not go far enough into the lifecycle of products. In order to stop the leakage of plastic waste, we must stop plastic waste itself. Real solutions pathways need to include redesigning products, packaging and overarching systems, and preventing the massive growth that the plastics industry currently aspires to achieve.

The authors of this report are seemingly resigned to the rapid expansion of global plastics production, which is projected to increase from 250 million metric tonnes in 2015 to 380 million MT in 2025, rather than the responsible approach of designing out problematic products in the first place. This mindset will certainly allow for more creation of waste, but we simply refuse to buy into this kind of thinking. This is why many NGOs in the Philippines, Indonesia, India, China and other countries in Asia are working with local government units (LGUs) and national governments to implement policies at the local up to the national level, banning or regulating problematic and disposable products.

We are also alarmed that the report puts heavy emphasis on using incineration technologies as one of the primary “solutions” to address plastics leakage. It has grossly underestimated how much it would cost to build these incinerators, much less operate them on a daily basis, and it glosses over the health and environmental impacts of burning so much waste. It is alarming that it is recommending to increase incineration rates in the countries mentioned, when citizens of these countries already struggle with so much air pollution in their cities.

Was it even considered at all in the making of this report that in the countries mentioned, citizens are working hard to promote solutions that do not rely on incineration, and that they may not want polluting and toxic technologies in their communities in the first place? There are hundreds of solutions being implemented in these countries that rely on community-based approaches of decentralized waste separation and collection, increased resource recovery, composting, recycling and waste reduction, that have opened economic opportunities for millions of waste workers and are being sustained at costs that are a fraction of what it would take to build an incinerator. Some of these stories can be found in the report, [“On the Road to Zero Waste: Successes and Lessons From Around the World”](#) a collection of case studies documenting places making real progress towards Zero Waste goals.

To suggest waste-to-energy incineration and refuse-derived fuel as medium-term solutions to plastic pollution also ignores why we need to wean off fossil fuel products such as petroleum and plastics right now. Burning waste and plastic products perpetuates climate changing fossil fuel extraction from rapidly-depleting sources. It is also one of the worst things we can do for our oceans—incineration releases extremely high levels of greenhouse gases, which in turn lead to rising sea levels, increased ocean toxicity, and destruction of coral reefs and other marine life through climate change.

“This report tries to set back all the hard work and efforts of local groups and frontline communities who have been fighting incinerators and campaigning for genuine upstream solutions to the waste crisis,” said Von Hernandez, Goldman Prize Winner and former Executive Director of Greenpeace Southeast Asia. “Any solution that aggravates a problem is a false solution. Waste-to-energy incinerators and resource-derived fuels sustain the demand for new plastics for every piece that they burn, thus maintaining the current resource-extractive mindset of the industry - and this we must not allow to continue,” he adds.

In China, where it is suggested to increase burning waste up to 80%, non-government organizations working on waste have documented that 18-30% of incinerators have no capacity to meet environmental regulations. Out of 160 operating MSW incinerators, 40% have incomplete air emissions data available to the public, and among those that have data, 69% have records of violating new environmental air pollution standards.

“Given the terribly low compliance rates and bad transparency showed above by both government literature and civil society report, the expansion of MSW incineration in China could result in unacceptable increase of pollutant emission, more environmental law violations and higher costs of public health. More importantly, relying on incineration will continuously impede China’s efforts of pursuing sustainable waste management, which is based on prevention, separation and recycling/composting,” states Mao Da, co-founder of the organization Rock Energy and Environment Institute.

It is also unconscionable that the climate impacts of allowing the increased generation and incineration of plastics materials were all but ignored in this report, when disaster risks brought by climate change have already caused massive damage to human lives, homes, public infrastructure, agriculture and economies especially in countries like the Philippines.

It is unsurprising, however, that this report asks us to manage an ever-increasing supply of plastics rather than shift the underlying economic problems with our “dig, burn, dump” economy, as the corporations on the Steering Committee of this report (including Dow Chemical, the American Chemistry Council, and Coca Cola) all benefit from our current system. These are not companies that will support the kinds of solutions we really need, and they have a track record of making decisions with disastrous consequences for human rights, public health, and the climate.

We appreciate the huge undertaking that went into this report, the admirable effort to critically examine how plastics enter our oceans and the effort to offer solutions to address this crucial issue. But let's not trade marine health for children's health -- we know we can have both.

**Signed by:**

**Asia-Pacific organizations and networks**

China Zero Waste Alliance (CZWA), China

Wuhu Ecology Center, China

Eco Canton, China

Nature University, China

Ecological Alert and Recovery Thailand (EARTH), Thailand

Gerakan Indonesia Diet Kantong Plastik, Indonesia

Meiki Paendong, WALHI West Java, Indonesia

GITA PERTIWI, Indonesia

Environment and Social Development Organization, Bangladesh

Shibu K. Nair, Director, Sustainable Resource Use and Management, Thanal, India

Pesticide Action Network, India

Shashi Pandit/All India Kabadi Mazdoor Mahasangh (AIKMM), Delhi, India

Community Environmental Monitoring, Chennai, India

Coastal Resource Center, Chennai, India

Gopal Krishna, Toxics Watch Alliance (TWA), India

Prithvi Innovations, India

Nagrik Chetna Manch, Pune, Maharashtra, India

KKPKP, India

SWACH, India

DLR Prerna, India

Ram Charitra Sah, Executive Director, Center for Public Health and Environmental Development (CEPHED), Kathmandu, Nepal

Mahmood A. Khwaja, Ph.D. Senior Adviser, Chemicals, Sustainable Industrial Development & Hazardous Waste/Sites, Sustainable Development Policy Institute (SDPI), Islamabad, Pakistan

Taiwan Watch Institute, Taiwan

Consumers Association of Penang, Malaysia

Sahabat Alam Malaysia (Friends of the Earth-Malaysia), Malaysia

Kuala Lumpur Rejects Incinerator Action Committee, Malaysia

Pesticide Action Network Asia-Pacific, Malaysia

National Toxics Network, Australia

Zero Waste WA, Australia

Zero Waste OZ, Australia

Alliance for A Clean Environment (ACE), Western Australia

Pesticide Action Network Aotearoa, New Zealand

Island Sustainability Alliance CIS Inc ("ISACI"), national association, Cook Islands (South Pacific)

Takeshi Yasuma, International Coordinator, Citizens Against Chemicals Pollution (CACP), Japan

Toxic Watch Network, Japan

Ark Eden, Hong Kong

James Middleton, Chairman, Clear the Air, Hong Kong

Global Alliance for Incinerator Alternatives (GAIA), Philippines

EcoWaste Coalition, Philippines

Mother Earth Foundation, Philippines

Health Care Without Harm Southeast Asia, Philippines

Cavite Green Coalition, Philippines

Greenpeace Southeast Asia, Philippines

La Sallian Community Development Center, Philippines

BAN Toxics, Philippines

Zero Waste Philippines, Philippines

November 17 Movement, Philippines

Concerned Citizens Advocating for Philippine Environmental Sustainability (COCAP), Philippines

Angkan ng Mandirigma, Philippines

Bangon Kalikasan Movement, Philippines

Philippine Earth Justice Center, Inc., Philippines

Shoreline, Philippines

Green Convergence, Philippines

Batangas 2 Fisherman Association (BAFA), Philippines

Miriam Public Education and Awareness Campaign for the Environment (Miriam-PEACE), Philippines

ROTC Neighborhood Association (ROTCNA), Philippines

Zero Waste Recycling Movement of the Philippines Foundation, Philippines

Krusada sa Kalikasan, Philippines

Partnership for Clean Air, Philippines

Isagani Serrano, President, Philippine Rural Reconstruction Movement (PRRM), Philippines

Alyansa Tigil Mina (ATM), Philippines

Action for Nurturing Children and Environment (ANCE)

Sining Yapak (SIYAP), Philippines

Cycling Advocates (CYCAD), Philippines

Freedom from Debt Coalition, Cebu, Philippines

KPML-Cebu, Philippines

Sanlakas Cebu, Philippines

LISU, Philippines

Philippine Pollution Monitor, Philippines

Ministri ng Pamamahala sa Kalikasan - Parokya ng San Jose Manggagawa, Philippines

Malikhaing Landas na magpapaYAbong sa sining at kultura (MALAYA-Cavite), Philippines

Philippine Medical Association, Philippines

Advocates for Environment and Social Justice, Philippines

Interface Development Initiatives Inc. (IDIS), Philippines

Masipag Mindanao, Philippines

Cycle for Life - Mindanao, Philippines

Mamamayan Ayaw sa Aerial Spraying (MAAS), Philippines	Hum-Hyderabad: <i>a movement</i> , Hyderabad, Telangana, India
IAOMT Philippines	Zero Waste Himalaya Sikkim, India
Sarilaya-Cavite, Philippines	Ecotourism & Conservation Society of Sikkim (Gangtok Sikkim), India
Kinaiyahan Foundation, Philippines	Focus on the Global South, Philippines
Nagkakaisang Mamamayan ng Maguyam-Cavite, Philippines	Nuclear-Free Bataan Movement, Philippines
Buklod Tao, Philippines	Earth Island Institute-Philippines
Pesticide Action Network Asia Pacific	ECOZINE   HK CLEANUP, Hong Kong
Philippine Movement for Climate Justice, Philippines	DISHA, India
Aniban ng mga Manggagawa sa Agrikultura, Philippines	Health Care Foundation Nepal, Kathmandu, Nepal
Toxic Action network, Central Asia	Naderev Sano, former Commissioner, Climate Change Commission, Philippines 350.org, Philippines and South East Asia
Arugaan, Philippines	IPEN, Asia and global
Plastic Free Seas, Hong Kong	Yayasan Pecinta Budaya Bebalı (YPBB), Indonesia
Globalization Monitor, Hong Kong, China	
Save Our Urban Lakes-SOUL, Hyderabad, Telangana, India	

### **Signers from Local Governments and Government Offices**

City Environment and Natural Resources Office, City of Bacoor, Philippines

City Solid Waste Management Office, Mandaluyong City, Philippines

Office of Councilor Dorothy Delarmente, Quezon City, Philippines

Office of Councilor Irvin Paulo Tapales, Antipolo City, Philippines City Government of San Fernando, Pampanga - Philippines

Hon. Carlos Padilla, Deputy Speaker, House of Representatives, Philippines

Hon. Ruth Padilla, Governor, Province of Nueva Vizcaya, Philippines

## Goldman Environmental Prize Recipients

Dr. Bobby Peek, groundWork, Friends of the Earth, SA, Goldman Prize Recipient 1998 Africa

Von Hernandez, Global Development Director, Greenpeace International, Goldman Prize Recipient 2003, Philippines

Craig Williams, Kentucky Environmental Foundation, North American Goldman Prize Recipient 2006, USA

Yuyun Ismawati, Senior Advisor and co-founder of BaliFokus, Coordinator of Indonesian Toxics-Free Network, Goldman Environmental Prize Recipient 2009, Indonesia

Dr. Olga Speranskaya, IPEN Co-Chair/Eco-Accord chemical and health policy lead, Goldman Prize Recipient 2009, Europe

Desmond Mathew D'Sa, South Durban Community Environmental Alliance Coordinator, Durban, South Africa, Goldman Prize Recipient 2014, Africa

Manana Kochladze, Green Alternative, Georgia, Goldman Prize Recipient 2004

Kimberly Wasserman, LVEJO, USA, 2013 Goldman Prize Recipient, North America

## With global support from:

Paul Connett, PhD, former Director of Work on Waste, USA and author of [The Zero Waste Solution](#), (Chelsea Green, 2013), USA

Captain Charles Moore, Oceanographic Research Vessel Alguita, Inc., Author of [Plastic Ocean](#), USA

Enzo Favoino, Scuola Agraria del Parco di Monza, Scientific Coordinator of Zero Waste Europe, Member of EU expert panels on LCAs, Co-founder of European Compost Network (ECN), Italy

Stephen Brittle, President, Don't Waste Arizona, Phoenix, AZ, USA

Ellen Connett, Managing Director, Fluoride Action Network, USA

Greenaction for Health and Environmental Justice, USA

Eric Lombardi, Executive Director of Eco-Cycle International, and author of The Community Zero Waste Roadmap ([www.EcocycleSolutionsHub.org](http://www.EcocycleSolutionsHub.org)), USA

Samantha MacBride, Ph.D., Baruch College School of Public Affairs, and author of [Recycling Reconsidered](#) (MIT Press 2012), USA

Urban Ore, Inc., To End the Age of Waste, USA

Joel Tyner, Dutchess County Legislator, D. #11, (Rhinebeck/Clinton), New York State, Founder, The Real Majority Project, Zero Waste Coalition of Dutchess County, USA

Marcus Eriksen, PhD

5 Gyres Institute, USA

Story of Stuff Project, USA

Suchitra Balachandran and Greg Smith, Co-Directors, Community Research, College Park, Maryland, USA

Tim Brownell & Bryan Ukena co-presidents of Eureka Recycling, Minneapolis, Minnesota, USA

Susan Hubbard, Nothing Left to Waste, USA

Neil Seldman, President, Institute for Local Self-Reliance, USA

Perry Gottesfeld, Executive Director,  
Occupational Knowledge International, USA

Pesticide Action Network, Mauritius

Jindrich Petrlik, Executive Director, Arnika -  
Toxics and Waste Programme, Czech Republic

Eugeniy Lobanov, Director, Center of  
Environmental Solutions, Belorussia

Alejandra Parra Muñoz, Red de Acción por los  
Derechos Ambientales (RADA), Temuco, Chile

Health & Environment Alliance (HEAL), Belgium

South Durban Community Environmental  
Alliance, Durban, South Africa

Earthlife Africa Cape Town, South Africa

Billy M. Lombe, Founder, Youth Environment  
Network (YEN), Zambia

Institute for Zero Waste in Africa, South Africa

Ecologists without Borders Association / Zero  
Waste Slovenia

UNENGO MAMA-86, Ukraine

Health & Environment Alliance (HEAL), Belgium

Pesticide Action Network Aotearoa, New  
Zealand

GroundWork, Friends of the Earth, South Africa

United Kingdom Without Incineration Network  
(UKWIN), UK

International Campaign for Responsible  
Technology

TOXISPHERA Environmental Health Association,  
Director: Zuleica Nycz, Brazil

APROMAC Environmental Protection  
Association, Legal Representative: Hassan Sohn,  
Brazil

AMAR – Environmental Protection Association,  
Vice-Director: Lidia Lucaski, Brazil

Biofuelwatch, USA & UK

Alan Muller, Airheads Energy & Environmental  
Consulting, USA

Jane Williams, California Communities Against  
Toxics, USA

Armenian Women for Health and Healthy  
Environment, Armenia

ONG Carbone, Guinea

Santos SP, Brasil

Alaska Community Action on Toxics, USA

Green Delaware, USA

Fundación para la Defensa del Ambiente  
(FUNAM), Argentina

Professor of Evolutionary Biology at the  
National University of Cordoba (Argentina)

Prof. Dr. Raúl A. Montenegro, Biologist,  
Argentina

Women in Europe for a Common Future  
(WECF), Germany

Jeffer Castelo Branco, ACPO - Associação de  
Combate aos Poluentes, Brazil

Kammie Holder, Advocacy Director, Future  
Centre Trust/ Zero Waste Barbados

Raul Montenegro, 2004 winner of the Right  
Livelihood Award (RLA, Alternative Nobel Prize,  
Stockholm, Sweden)

Little Village Environmental Justice  
Organization, Chicago, USA

Divers for Sharks, Brazilian Representative Mr.  
José Truda Palazzo, Brazil

Environmental Education Association to the Future Generations (AEEFG), Tunisia

Californians Against Waste, USA

Charlene Lemoine, Waukesha County Environmental Action League (WEAL) – Wisconsin, USA

Red de Acción por los Derechos Ambientales, Chile

Kerry Meydam, founder, Durham Environment Watch, Canada

Dr. Max Liboiron, Memorial University of Newfoundland, Director of Civic Laboratory for Environmental Action Research, Canada

Arthur R. Boone, owner, Center for Recycling Research, Berkeley, USA

Climate Justice Alliance, USA

MORE (Missourians Organizing for Reform and Empowerment), USA

John Harder, President, Zero Waste Kauai, USA

Asia Pacific Environmental Network, California, USA

Red de Accion Contra Las Plaguicidas (RAPAL), Uruguay

Mwadhini O. Myanza, Executive Director, Irrigation Training and Economic Empowerment Organization (IRTECO), Tanzania

Plastic Pollution Coalition, USA

Other Worlds, USA

National Association of Professional Environmentalists (NAPE), Uganda

Citizens for a Safe Environment Foundation of Toronto Inc., Canada

Plataforma Anti Incineració de Montcada i Reixac "Montcada Aire Net", Catalonia, Spain

Citizens for a Safe Environment Foundation of Toronto Inc., Canada

Zero Waste France

Acción Ecológica, Chile

Association for Nature, Environment and Sustainable Development Sunce, Croatia

Toxics Action Center, USA

La Alianza Resíduo Zero Brasil

Instituto Pólis, Brazil

Texas Campaign for the Environment, USA

Center for Earth, Energy and Democracy (CEED), USA

Hacia Basura Cero-Costa Rica

ONG Yo Reciclo, Chile

Fundación El árbol, Chile

Zero Waste Europe

Movement Generation: Justice and Ecology Project, USA

Daniel Knapp, Ph.D. CEO, Urban Ore, Inc. (Materials Recovery Enterprise in Berkeley, California), USA

Neighbors Against the Burner, St. Paul, Minnesota, USA

European Environmental Bureau

Pia A Harris, Arroyo S.E.C.O. Time Bank member, USA

Centre d'Ecologia i Projectes Alternatius-Ecologistes de Catalunya

Colectivo VientoSur, Chile

Clean Water Action, USA

Fundación Basura, Chile

Center for Environmental Health, USA

Taller de Comunicación Ambiental, Argentina

Fronteras Comunes A.C. , MÉXICO

OceanCare, Switzerland

Centro de Análisis y Acción en Tóxicos y sus Alternativas (CAATA), Mexico

Northern California Recycling Association, USA

Surfrider Foundation, Headquarters & European affiliate