

Vision Paper

Regional EPR:

A potential solution to reduce plastic pollution in SIDS and remote geographies

Statements of support

"Plastic pollution represents one of the most pressing environmental and economic challenges facing SIDS today. Despite contributing minimally to global plastic production, our island states bear a disproportionate burden from land-based mismanaged plastics and "legacy" waste arriving from distant sources. The IOC recognizes that a regional EPR approach offers a timely and pragmatic solution, enabling collective action, sustainable financing, and greater negotiating power for SIDS in global markets."

Raj Mohabeer, Head of Mission, **Indian Ocean Commission**

"The aggregation of resources – in terms of waste materials, technical knowledge as well as governance capacity – in regional co-design of a workable solution, addresses a number of local issues preventing effective waste management."

The African Circular Economy Network supports the vision of regional EPR for small island states and remote geographies and looks forward to seeing this vision implemented."

African Circular Economy Network (ACEN)

"It is in everyone's interest to support SIDS in fighting plastic pollution. EPR is a crucial instrument in financing and organising infrastructure to reduce plastic pollution and needs to follow wherever plastic products are being put on the market, especially when it comes to packaging. We can't leave SIDS alone to deal with the imported problems of plastic. If money can be made from importing and selling the plastics to the islands, then money can also be made available to preventing it from entering our shared ocean."

Rob Buurman, General Director, **Fair Resources Foundation**

"I believe that the regional approach to Extended Producer Responsibility (EPR) presents a transformative opportunity for Small Island Developing States (SIDS) to overcome shared challenges of scale, capacity, and resource limitations. By fostering regional collaboration, harmonised systems, and shared infrastructure, SIDS can more effectively manage waste streams, reduce marine pollution, and promote circular economy practices."

From my experience working in the Caribbean, I believe such an approach will not only strengthen environmental governance but also unlock economic and social co-benefits that contribute to sustainable island futures."

Professor Temitope Oyedotun, Dean, Faculty of Earth and Environmental Sciences at **University of Guyana**

"As a small and remote island nation, Tuvalu faces significant waste management challenges due to limited land, resources, and market access. A regional EPR approach offers a practical and collaborative solution to share responsibilities, reduce waste, and strengthen circular economy systems across the Pacific."

Emily Lafai, Waste Regulatory Officer, **Tuvalu Department of Waste Management**

We recognize the value of regional collaboration and context-specific solutions while emphasizing the need for coherence with global frameworks and national positions, to ensure a unified and effective global response to plastic pollution and support the intent of the Regional EPR for SIDS vision paper as an important step in Small Island Developing States."

Shalini Ghoyal Balla, Managing Director, **International Council for Circular Economy**

Supporting organisations



Key Messages

This paper calls urgent attention to the plastic pollution crisis facing SIDS and makes the case that a regional approach to EPR has the potential to offer an impactful and effective solution. By endorsing this paper, stakeholders are uniting behind the vision of developing a regional EPR model that is tailored to the unique contexts of SIDS and other remote geographies.

- 1 Small Island Developing States (SIDS) are on the frontlines of a plastic pollution crisis not of their making. Despite contributing little to plastic production, they are disproportionately impacted by plastic pollution**, including from 'legacy plastics' that wash up on their shores from distant sources.
- Extended Producer Responsibility (EPR) has proven to be a successful model to support countries in their efforts to manage waste. **However, the application of traditional EPR in SIDS poses unique challenges.**
- Endorsing this vision of a regional approach to EPR signals recognition that SIDS need solutions tailored to their realities.** This approach offers an urgent and timely opportunity to build lasting systems that strengthen economic resilience, reduce reliance on fragmented grant funding, and deliver a more sustainable response to the plastic pollution crisis.
- Further research led by Common Seas reflects commitment to turning this vision into action.** Their initial findings on regional EPR design provide a foundation for regions to take the next critical steps – through targeted scoping, feasibility studies, and pilot initiatives – to shape models that can work in practice and deliver real impact.

Plastic pollution disproportionately impacts remote geographies

11 million tonnes of plastic flow into the ocean every year. By 2040, this is expected to quadruple, gravely threatening the marine environment that supports a thriving blue economy.

Small Island Developing States (SIDS) and other remote geographies rely on healthy seas to regulate their microclimate, preserve their cultural heritage, and provide the foundation of their economies and wellbeing.

Despite contributing less than 2% of global mismanaged plastic waste, remote geographies are disproportionately impacted by it – both by land and by sea (GIZ, 2022).

By land, geographic isolation, high waste management costs due to low economies of scale, and minimal local treatment infrastructure make it difficult to effectively manage the plastic placed onto their markets, most of which is imported.

By sea, remote geographies often suffer from plastics washing up on their shores from distant sources, known as 'legacy' plastics. Some sources estimate this to be the most significant share of plastic pollution in remote geographies.

There is no silver bullet: comprehensive solutions across the plastics lifecycle are needed.

Upstream solutions that reduce the overall production of plastics – such as bans, reuse schemes, and better product design for longevity – should be prioritised to prevent plastic pollution at its source.

At the same time, improving collection, sorting, and recycling is essential for the plastic waste that does reach remote areas. But in these geographies, the economics often don't add up. Extended Producer Responsibility (EPR) can help finance these efforts, though how best to design it for remote settings remains underexplored.

SIDS contribute less than 2% of global mismanaged plastic waste

About this paper

This vision paper outlines the rationale for exploring a regional approach to EPR in SIDS and remote geographies. It begins by exploring the key challenges associated with implementing traditional forms of EPR in SIDS. It then considers how a regional approach could offer a solution that is better adapted to the unique circumstances of SIDS.

Common Seas convened an expert group of advisors and collaborators through virtual workshops to explore the opportunities and challenges of a regional EPR model. These were complemented by targeted interviews and bilateral discussions with SIDS governments and stakeholders to ensure diverse perspectives shaped the research.

While this vision paper is intended as a high-level and accessible overview, it is informed by a more detailed technical report that investigates the design and operationalisation of a regional EPR model.

Together, these resources aim to support greater alignment and momentum among governments, regional bodies, and development partners working to advance plastic pollution solutions in SIDS.

EPR is gaining traction worldwide

Extended Producer Responsibility (EPR) is an environmental policy approach where producers are given significant responsibility for the end-of-life management of their products – particularly for recycling and disposal costs. It is increasingly seen as a key mechanism to drive circular economy outcomes, with over 400 schemes now in place globally (OECD, 2018).

EPR applies the Polluter Pays Principle by shifting responsibility from local governments to producers. In doing so, it creates incentives for more sustainable product and packaging design, while also ensuring consistent financing for post-consumer waste management.

EPR is widely recognised as the only proven model to ensure consistent and sufficient financing for the collection, sorting, and recycling of post-consumer waste.

Though historically more common in high-income countries, EPR is now increasingly being adopted in low- and middle-income countries. Major packaging producers also support EPR as a means to level the playing field and provide regulatory and market certainty.

What does this mean for remote geographies?

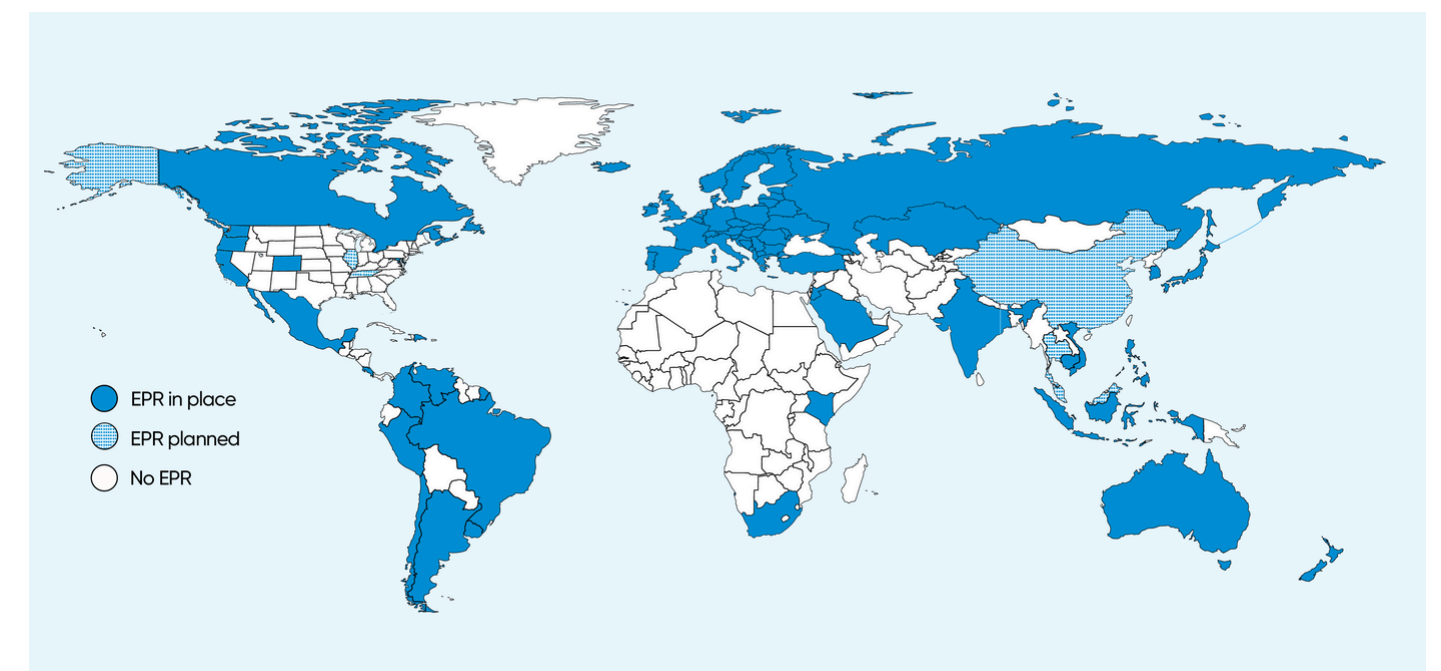
While remote geographies have shown support for the Polluter Pays Principle, very few have implemented EPR to date (beyond deposit return schemes). There is also a notable gap in academic literature and policy frameworks concerning EPR in SIDS (EMF, 2021).

The academic and policy discussions that do exist often have little consideration for specific needs of SIDS, focusing instead on broader global standards that do not fit the nuanced challenges these geographies face.

However, these challenges do not necessarily mean that EPR is unworkable in remote geographies – rather, they highlight the need for a tailored approach.

This raises a critical question: **what does EPR mean for remote geographies, and how can it be designed to be both effective and feasible in these areas?**

Understanding how remote geographies can adapt EPR schemes to their unique economic and geographic contexts will be a critical part of the suite of solutions needed to fight plastic pollution on their shores.



EPR schemes around the world (Earth Action, 2025)



Could a regional approach to EPR be a solution?

Key challenges for traditional forms of EPR in SIDS

Low economies of scale and complex logistics

In remote geographies, small and often dispersed populations generate relatively low volumes of plastic waste. This makes it difficult to achieve the scale necessary for efficient recycling operations, and to justify investment in often-expensive infrastructure.

There are also logistical challenges of transporting plastic waste from remote areas or islands to centralised recycling facilities. Travelling large distances to collect volumes of waste that will not allow operators to offset costs through the processing or sale of those materials often leads to limited or non-existent collection or recycling services.

Isolated locations and access to end markets

Many remote locations lack domestic processing facilities due to the challenges described above, forcing them to export plastic waste to distant markets.

The high costs of shipping recyclate – both internationally and within geographically dispersed countries – erodes profitability, making it difficult to sustain operations.

Additionally, in many SIDS, informal waste workers operate independently due to isolated locations, lacking a union or cooperative organization to represent their needs, limiting their impact.

High presence of legacy plastics

Remote geographies, particularly islands, grapple with the burden of plastic waste that washes up on their shores, carried by ocean currents from distant sources.

This degraded, no-value waste is costly and labour-intensive to collect, with little to no opportunity for recycling or resale.

Reliance on imports and limited local bargaining power

Designing EPR schemes in remote geographies presents unique challenges due to high reliance on imports and the limited presence of local manufacturers that can be directly engaged to take responsibility for their products. Waste management costs may instead be borne by small importers who are less able to absorb the costs.

Remote geographies often also have small market sizes, giving them less bargaining power to demand changes such as packaging design or material choices that would make waste management more viable.

Low-capacity governments

Enforcing EPR in remote geographies can be challenging due to limited administrative capacity, experience and budget, making compliance monitoring and enforcement difficult.

Key opportunities for regional EPR approaches

These challenges underscore the need for a sustainable financing model to address plastic pollution in remote geographies. Further research led by Common Seas has identified the potential of a regional EPR approach – a coordinated strategy that unites neighbouring islands under a unified regional body – to tackle these issues through harmonised action. While the specific design of each model will largely depend on the region and the individual countries within it, we highlight below key opportunities for harmonised, regional action on EPR.

Achieving economies of scale and cost-effective logistics

By coordinating waste management across multiple locations, waste can be aggregated more efficiently, increasing overall volumes and enabling economies of scale. This reduces per-unit costs and makes processing more effective.

Beyond operational benefits, economies of scale also promote fairness. Traditional waste systems rely on material sales and favour high-volume urban areas. In contrast, a regional EPR model, funded by producer fees, could enable waste services to reach remote communities, where waste management options are often limited to dumping or burning.

Increased connectivity and access to end markets

Once sufficient volumes of waste are aggregated, a central administrator can efficiently manage logistics, identifying the most cost-effective shipping routes while accounting for distances and fluctuations in market prices for post-consumer waste.

By acting as a material broker or trader, the system can expand the range of available markets for recycled materials and secure better prices through higher economies of scale.

Additionally, increasing waste volumes through collaboration creates opportunities to develop regional processing infrastructure that would otherwise be unavailable due to low material volumes.

A regional approach could also provide a framework to support and recognize the contribution of the informal sector and explore pathways for integration.

Targeting legacy plastics

It should be evaluated whether a regional EPR strategy could establish clear mechanisms for addressing legacy products, such as mandating that producer fees cover investment in clean ups. This could ultimately enhance the effectiveness and fairness of the system, addressing a difficult challenge for remote geographies, particularly SIDS.

Empowering SIDS and including brands

Uniting SIDS under a single regional body would strengthen their negotiating power by enabling collective engagement with foreign suppliers to establish harmonised design specifications. This would ensure that imported products meet harmonised sustainability and recyclability standards. This regional harmonisation can create more attractive and accessible markets for brands, as standardised regulations across neighbouring islands reduce trade barriers and streamline compliance.

This coordinated approach could also allow a broader interpretation of producer responsibility and explore addressing legacy plastics, moving beyond the traditional model where obligations fall solely on the importer in the absence of local production.

Decreasing dependence on public sector

A regional approach to EPR, led by a trusted regional body, can significantly reduce the enforcement burden on overstretched public sector agencies and customs officials in individual countries. It can also enhance compliance monitoring, such as by introducing third-party auditing and enforcement.

Case study

Towards a regional EPR system: circular economy leadership in the Indian Ocean



Image source: SciDevNet, Indian Ocean Commission

In September 2023, the Indian Ocean Commission (IOC) was formally tasked by their state members to drive forward regional efforts on circular economy development, with Extended Producer Responsibility (EPR) as a key policy tool.

This landmark decision, endorsed at the Ministerial Conference held in Port-Louis, Mauritius, culminated in the adoption of the Declaration of the Ministers and High Representatives of the Island States of Africa and the Indian Ocean for the Development of the Circular Economy.

Following the 2023 Ministerial Conference and a regional workshop in 2024, next steps have been developed with support from the Global Action Partnership for EPR (GAP for EPR). This is a joint initiative of GIZ, OECD, UNEP, WWF, and hosted by the PREVENT Waste Alliance—in partnership with the Africa Circular Economy Network (ACEN). The resulting report, *Next Steps of EPR for the Island States of the Indian Ocean*, outlines a six-part strategy:

1. Establish a regional EPR Steering Group
2. Harmonize EPR frameworks across islands
3. Assess national waste management systems
4. Map recycling and export opportunities
5. Pilot key waste streams
6. Strengthen maritime cooperation

This initiative marks a significant step toward operationalising the principles of Extended Producer Responsibility (EPR) at a regional level, aligned with the overarching goal of fostering a circular economy in the Indian Ocean island states.

It will offer a blueprint not only for the IOC member states, but for other regional blocs seeking integrated solutions to waste and resource challenges.

Looking ahead

This vision paper reflects the shared endorsement of stakeholders across sectors in recognising the opportunity and urgency of addressing the unique plastic pollution challenges facing SIDS.

It is informed by research and a detailed technical report led by Common Seas, in collaboration with an expert advisory group, examining the design and implementation of a regional EPR model.

The report examines the different options for designing a regional EPR model, covering key design considerations. These include: legal foundations and institutional arrangements, operational and financial flows, end markets and obligated entities, and governance and enforcement mechanisms.

Further work is now needed to adapt this research to the unique contexts of participating regions. Adapting it to specific regions should include detailed scoping and feasibility studies, targeted stakeholder consultations, and pilot initiatives to test and refine the model in practice.

With guidance from the advisory group, Common Seas remains committed to supporting SIDS and remote geographies in identifying and developing regional solutions that are responsive to their unique contexts.





About Common Seas

Common Seas drives systemic change, creating partnerships to design and deliver resources and solutions that stop the flow of plastic pollution.

Our programmes are centred on:

- Leading policy changes through partnerships with governments, providing technical expertise and convening the right stakeholders for action.
- Commissioning research and raising awareness of the human health impacts of plastics to inspire and motivate change.
- Empowering and equipping children, through their schools, to stop the flow of plastic pollution.

We work with countries that are most affected by plastic, particularly SIDS and small coastal countries, supporting a just transition to a future freed from plastic pollution.

To find out more, please visit: www.commonseas.com

Supported by UK International Development

The research behind this Vision Paper is supported by funding from the UK Government's Sustainable Blue Economies Programme, which aims to enhance the resilience of Small Island Developing States (SIDS). However, the views expressed do not necessarily represent the UK government's official policies.

References

Earth Action. (2025). Shift into gear – how businesses can prepare for the era of global plastic regulation. Retrieved from <https://www.e-a.earth/wp-content/uploads/2025/03/EA-SAP-Report-HD.pdf>

EMF (Ellen MacArthur Foundation). (2021). *Extended Producer Responsibility: A Necessary Part of the Circular Economy*. Retrieved from: <https://www.ellenmacarthurfoundation.org/assets/downloads/EPR-A-necessary-part-of-the-circular-economy.pdf>

GIZ (German Agency For International Cooperation). (2022). *Small Island Developing States and Plastic Pollution: Challenges and Opportunities of a Global Agreement on Plastic Pollution for SIDS*. Retrieved from: <https://www.giz.de/de/downloads/giz2022-en-sids-plastic-pollution.pdf>

Grimes, S. (2014). *Ocean Science for development in SIDS: Facts and figures*. Retrieved from: <https://www.scidev.net/global/features/ocean-science-development-sids-facts-figures/>

OECD (Organisation for Economic Co-operation and Development). (2018). *Extended Producer Responsibility: Updated Guidance for Efficient Waste Management: Executive Summary*. Retrieved from: https://www.oecd.org/content/dam/oecd/en/publications/reports/2016/09/extended-producer-responsibility_g1g6742c/9789264256385-en.pdf

Common Seas (2025). *Regional EPR as a potential solution to reduce plastic pollution in SIDS and remote geographies*.