



**World Customs
Organization**

Challenges in identifying existing trade flows of substitutes and alternatives to plastics

“Workshop on sustainable and effective substitutes and alternatives for plastics”

Geneva, 6 December 2022, WTO / UNCTAD

What is the Harmonized Commodity Description and Coding System (HS)?



A goods Nomenclature, a **Universal Customs Language** currently supporting more than 98% of global trade!



It enables goods moving across borders to be uniformly described all over the world.

HS – current status and potential



Can the HS facilitate the trade of sustainable and effective substitutes and alternatives to plastics?

Are these substitutes and alternatives visible in the current HS?

Are they classified in the same HS codes as the “traditionally” traded goods?

To what extent does the HS have the potential to facilitate the trade of these alternative products?

Example 1 - Shopping bags

“Traditionally” traded

Polyethylene (PE) single-use bag

HS code: 3923.21

Polypropylene (PP) single-use bag

HS code: 3923.29



Example 1 - Shopping bags

“Newly” traded alternative

Biodegradable bag made of vegetable starch, glycerin and poly(vinyl alcohol)

HS code: 3923.29

**Exactly the same subheading
as that of polypropylene
single-use bags**



Example 2 – Disposable dinner plates



“Traditionally” traded

Disposable dinner plates made of polypropylene

HS code: 3924.10



“Newly” traded alternatives

Moulded dinner plates made of sugar cane

HS code: 4823.70



Example 2 – Disposable dinner plates

48.23

Other paper, paperboard, cellulose wadding and webs of cellulose fibres, cut to size or shape; other articles of paper pulp, paper, paperboard, cellulose wadding or webs of cellulose fibres.

4823.20 - Filter paper and paperboard

4823.40 - Rolls, sheets and dials, printed for self-recording apparatus

- Trays, dishes, plates, cups and the like, of paper or paperboard :

4823.61 -- Of bamboo

4823.69 -- Other

4823.70 - Moulded or pressed articles of paper pulp

4823.90 - Other



Sugar cane plates and traditional disposable plastic plates are in a different HS code (4823.70 vs 3924.10).

Subheading 4823.70 does not specifically cover moulded or pressed tableware and kitchenware of paper pulp.

Example 3 – Drinking straws



“Traditionally” traded

Disposable plastic drinking straws

HS code: 3917.32



“Newly” traded alternatives

Bamboo drinking straws

HS code: 4419.19



For what purposes is the HS used?



Basis for the National Customs Tariffs

Statistical information

Trade measures

Enforcement

Challenges in identifying the existing trade flows of substitutes and alternatives to plastics

The Classification is done at the border!

Clear and objective criteria for the definition of the goods covered by a code

This criteria must be observable or testable at the border

Acceptable globally and not be changed over the life cycle of the HS version

Identification of alternatives for plastics



Moulded dinner plates made of sugar cane

HS 2022

4823.70 - Moulded or pressed articles of paper pulp



Maybe for HS 2027?

4823.7 - Moulded or pressed articles of paper pulp

4823.71 - - Plates

4823.79 - - Other

Challenges in identifying the existing trade flows of substitutes and alternatives to plastics



Subdivision by feedstock for plastics in primary form, dividing fossil fuel, bio-based or recycled feedstocks.

The defining criteria must be observable or testable at the border.

Identification of alternatives for plastics



Biodegradable bag made of vegetable starch,
glycerin and poly(vinyl alcohol)

3923.2 - Sacks and bags (including cones)

3923.21 - - of polymers of ethylene

3923.29 - - of other plastics

3923.2 - Sacks and bags (including cones)

3923.21 - - of polymers of ethylene

3923.xx - - ??????

3923.29 - - of other plastics



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Thank you!

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