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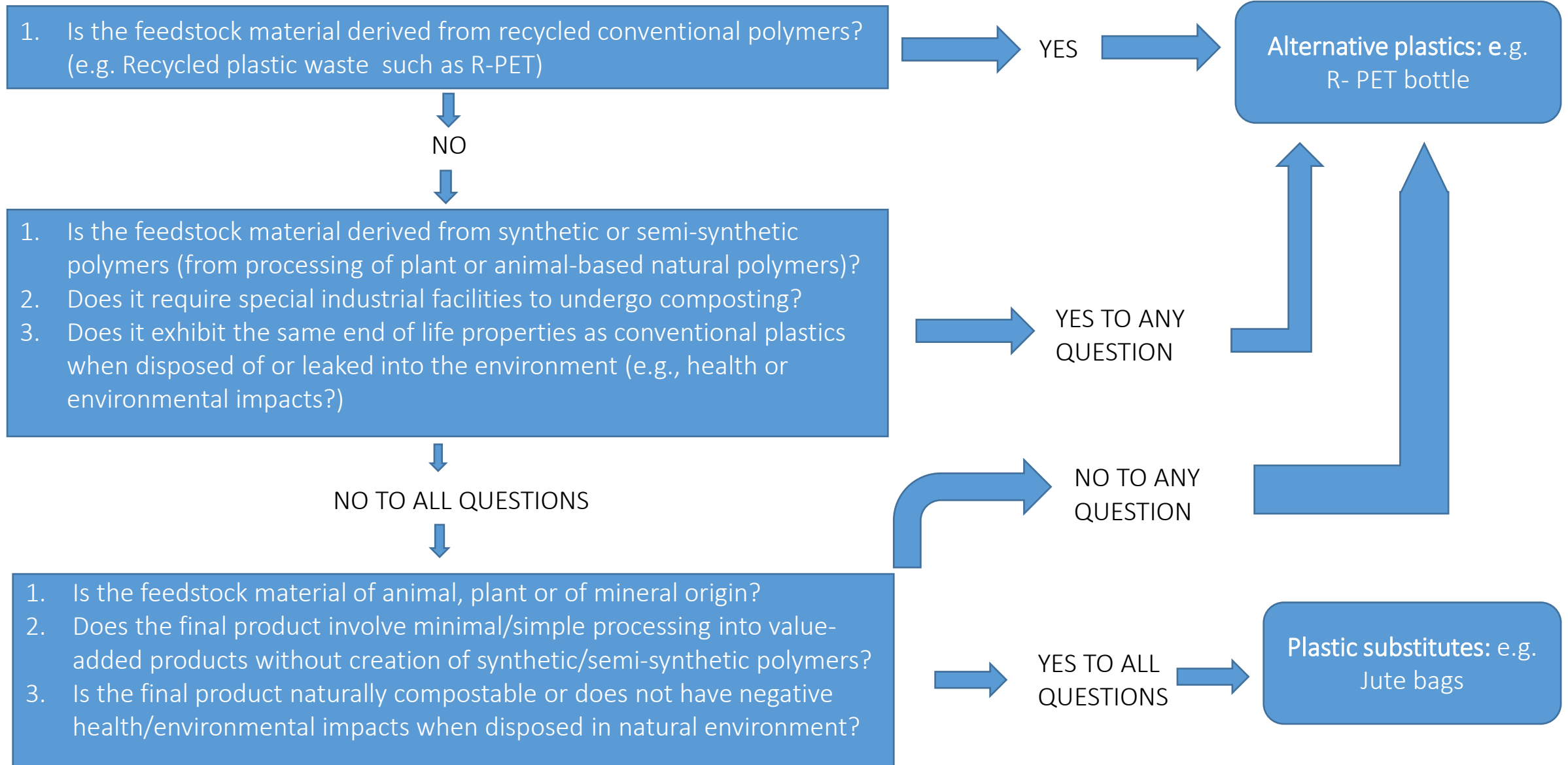
Plastic Substitutes and Alternatives: Definitional considerations and some options for HS reform

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Differentiating plastic substitutes and alternative plastics: Some considerations



The HS system and non-plastic substitutes

- A range of natural fibres and derived products are potential non-plastic substitutes for a range of single use plastic products and plastic packaging.
- Some of these products, such as jute, coir and sisal, as well as some derived products, have their own specific HS-6 subheadings making it easier to track trade flows. Certain value-added products such as jute, cotton and paper bags also have their own specific HS-6 digit subheadings.
- In terms of alternative plastics, there is also an HS code-390770 for polylactic acid (PLA) (a bio-based plastic)

<i>Illustrative examples</i>		
Feedstock [Category]	HS code	HS subheading description
Paper and cardboard [Natural Fibres]	4811.90	Other paper, paperboard, cellulose wadding and webs of cellulose fibres
Jute [Natural Fibres]	5303.10	Jute and other textile bast fibres, raw or retted
Sisal [Natural Fibres]	5607.21	Binder or baler twine; Of sisal
	5607.29	Other; Of sisal

Plastic substitutes: Considerations for HS reform (some examples)

- For many non-plastic substitutes, there no distinct HS subheading.
- For instance, there are no HS codes for banana or areca leaves, a potential material for non-plastic substitutes, or for takeout or takeaway containers made from such leaves.
- The closest subheading match appears to be HS 1401.90 (“Other vegetable materials of a kind used primarily for plaiting” – for example, bamboos, rattans, reeds, rushes, osier, raffia, cleaned, bleached or dyed cereal straw, and lime bark).

Feedstock [Category]	HS code	HS subheading description
Banana leaves <i>[Agriculture by-product]</i>	1401.90	Vegetable materials of a kind used primarily for plaiting (for example, bamboos, rattans, reeds, rushes, osier, raffia, cleaned, bleached or dyed cereal straw, and lime bark); Other

Plastic substitutes: Considerations for HS reform (some examples - 1)

- There are no specific HS codes for number of value-added non-plastic products made from such natural materials (e.g. takeaway containers made from banana leaves and hemp bags).
- Greater specificity at the HS 6-digital level or in national/regional classifications of promising substitute materials and value-added products could be considered, focusing for instance on promising substitutes and value-added products in the national context.

Substitute product	Relevant HS code	HS subheading description
Take-away food containers and plates for food (Of banana/plantain/areca leaves)	4602.19	Basketwork, wickerwork and other articles, made directly to shape from plaiting materials or made up from goods of heading 4601; articles of loofah; Of other vegetable materials.
Hemp bags	6305.90	Sacks and bags, of a kind used for the packing of goods; Of other textile materials

Plastic substitutes: Considerations for HS reform (some examples - 2)

- In some cases, there is a lack of clarity about which HS 6-digit subheading covers particular products.
- This can lead to uncertainty for customs officials as well as trade negotiators (i.e., if they wish to provide very specific tariff concessions to specific products)

For example, aluminium bottles could be classified under three HS subheadings:

- **7612.90**: Aluminium casks, drums, cans, boxes and similar containers (including rigid or collapsible tubular containers), for any material (other than compressed or liquefied gas), of a capacity not exceeding 300 litres, whether or not lined or heat-insulated, but not fitted with mechanical or thermal equipment; Other
- **7615.10**: Table, kitchen or other household articles and parts thereof; pot scourers and scouring or polishing pads, gloves and the like; Of aluminium
- **71616.99**: Other articles of aluminium

It may be helpful for members to give consideration to creating more specific descriptions (E.g. Aluminium bottles for water or liquid beverages) that can be more easily identifiable as a plastic substitute consumer product.

Other promising materials for plastic substitutes:
Potential further candidates for HS codes

Biomass Source	Material	Natural Polymer
Algae	Algae	Alginate
Crustaceans	Crustacean shells	Chitin
Microbes found in soil and oceans	Vivomer (proprietary)	

Thank You!

For questions or comments, please contact me at:
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