Report on Recommendations for Plastic Policies in Saint Lucia

Common Seas

Department of Sustainable Development

UK International Development

Partnership | Progress | Prosperity

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Background and approach

This report has been prepared by Common Seas under a partnership agreement with the Department of Sustainable Development in Saint Lucia.

The aims of this report are to:

- Assess the scale of the plastic pollution challenge in Saint Lucia,
- Provide recommendations to enhance the policies outlined in the Marine Litter Management Action Plan (ML-MAP), and
- Evaluate their potential to reduce plastic pollution and divert plastic waste from landfill.

Addressing plastic pollution can yield significant economic, social, and environmental co-benefits in Saint Lucia. These include safeguarding key industries such as tourism and fisheries, developing sustainable waste management industries, reducing public health risks, and preserving critical marine and terrestrial ecosystems.

Common Seas used the Plastic Drawdown tool to assess the scale and causes of macro- and microplastic pollution in Saint Lucia, and to explore potential solutions.

The analysis and policy recommendations build upon extensive work undertaken in recent years by the Saint Lucian government and its partners on the issue of plastic pollution. These have been substantially developed, incorporating insights from consultation with key stakeholders and a dedicated in-person workshop held in Saint Lucia in February 2025.

The scale and nature of plastic pollution in Saint Lucia

In 2024, Saint Lucia generated approximately 12,000 tonnes of macroplastic[1] waste, or 0.07 tonnes/ 70kg per capita per year. Equivalent to approximately 11,600 shipping containers full of plastic waste.

This figure is projected to grow to 14,600 tonnes by 2035 if no further action is taken. This will place increasing pressure on Saint Lucia's sole landfill, the Deglos Sanitary Landfill. Preventing this projected build-up of plastic could protect economic value equivalent to more than half of Saint Lucia's 2022 GDP by 2040.

Levels of plastic recycling are very low in Saint Lucia and primarily linked to pilot projects developed over recent years. The majority (≈96%) of plastic waste generated in Saint Lucia is collected via the formal waste management system and subsequently transferred to Deglos landfill site for disposal. Although landfill disposal is preferable to littering or open dumping, it still represents a downstream approach to waste management that does not address the root causes of plastic waste generation and pollution.

There is a growing need to prioritize upstream interventions—such as reuse and refill, promoting alternative materials, recycling and implementing Extended Producer Responsibility (EPR) schemes.

In 2024, approximately 347 tonnes of macroplastic waste escaped into the environment in Saint Lucia. Without swift policy intervention, by 2035 this is expected to grow by 22%, to 424 tonnes per year.

Although this represents less than 3% of total waste generated, this leakage is a significant issue as plastics persist in the environment for centuries.
This persistence leads to long-lasting and widespread harm to ecosystems, public health, the economy—including the island's vital tourism and fishing industries—and local communities' well-being.

The most common route plastic waste takes into the ocean is via littering or dumping. This includes all waste that is directly or indirectly littered, or illegally dumped on land, which is subsequently transported to the sea through flooding, heavy rainfall, or being blown into watercourses by the wind. Some plastic also enters the environment by escaping from the waste management system (for example, during transportation or at the disposal site) and a small proportion via wastewater systems. Figure E0.1 illustrates these flows for both micro- and macroplastics.

[1]Macroplastics are plastic items and particles over 5mm in size, in contrast to microplastics which are less than 5mmin size.

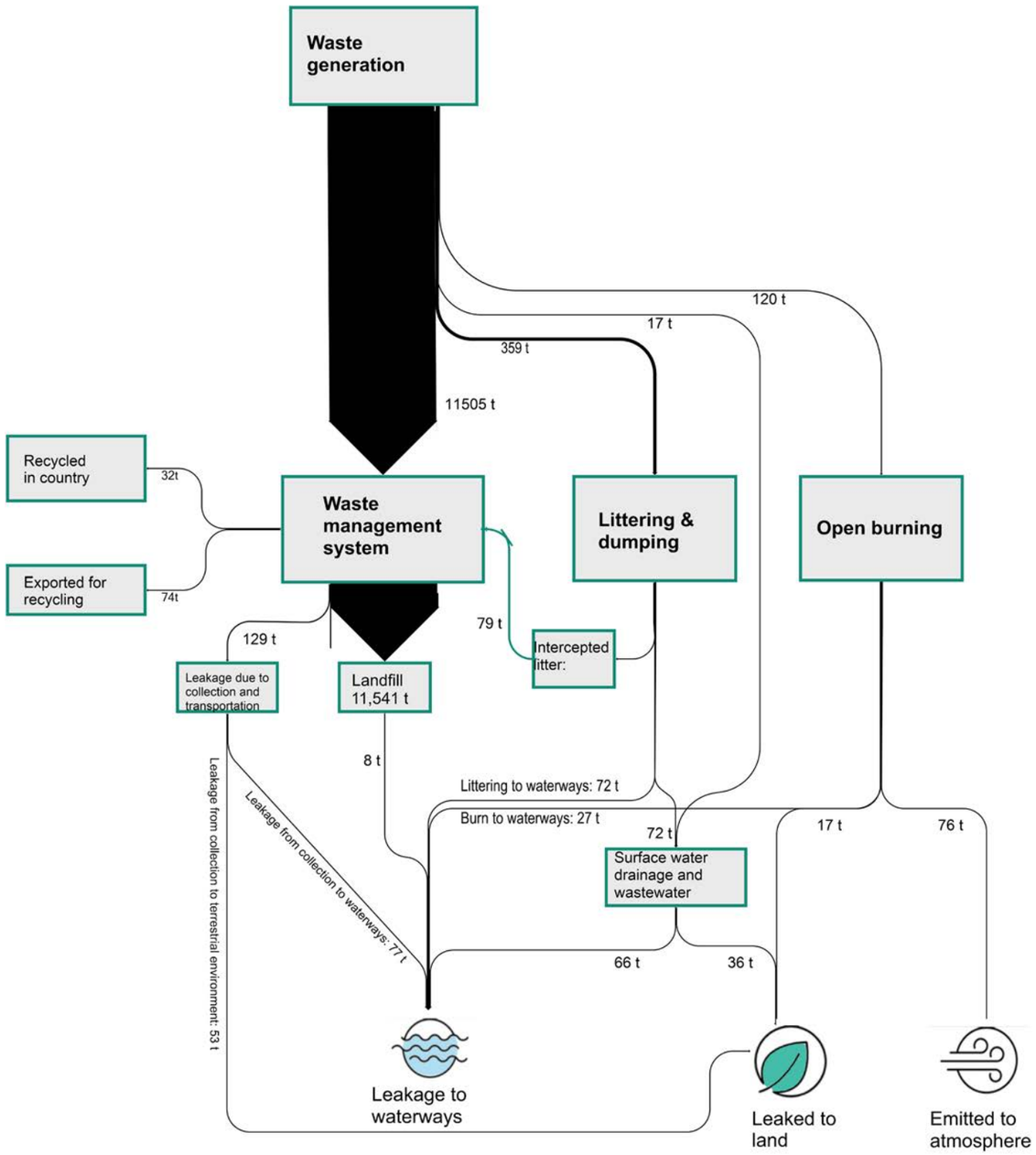


Figure E0.1 Simplified plastic waste flow summary (tonnes). Note that the thickness of the bar represents the proportion of plastic waste that flows via that pathway.[2]

[2] Due to summarising and rounding the values in this figure may differ slightly from those referred to throughout this report. This estimate is based on uncompacted waste densities and the volume of a standard forty-foot shipping container (67 m3).

Single-use plastics are a major contributor to plastic pollution in Saint Lucia, accounting for around 42% of plastic waste leaked into waterways. The most common identifiable plastic items entering the ocean in 2024 were beverage bottles (28.0 tonnes), other plastic bottles (16.1 tonnes), diapers (10.5 tonnes), and wet wipes (8.2 tonnes) (see Table E0.1).

TABLE E0.1 MOST COMMON IDENTIFIABLE PLASTIC ITEMS ENTERING THE OCEAN IN SAINT LUCIA 2024

Item	Weight (tonnes)
Beverage bottles	28.0
Other plastic bottles (oil, bleach, etc.)	16.1
Diapers	10.5
Wet wipes	8.2
Plastic bags	5.2
Food wrappers (candy, chips, etc.)	4.8

Policy analysis

Analysis of Saint Lucia's Marine Litter Management Action Plan (ML-MAP) indicates that:

1. The following selected policies could substantially reduce the amount of plastic waste that is landfilled by 30% (4,144 tonnes); and
2. these policies could reduce island-wide plastic pollution by 28% (87 tonnes) by 2035:

TABLE E0.2 POTENTIAL IMPACT OF ML-MAP POLICIES

Key ML-MAP policy measures	Plastic pollution reduction potential (tonnes/year by 2035)	Landfill avoidance potential (tonnes/year by 2035)
Management of Beverage Containers Bill – implementing a deposit return scheme (DRS) for plastic beverage containers will help reduce littering of this key component of plastic pollution.	32 tonnes	2,427 tonnes
Waste segregation and recycling – a phased roll-out of waste segregation for households, starting with a pilot area and common rigid-plastic containers. This can then grow to a national scheme collecting a wide range of plastic packaging items.	38 tonnes	1,083 tonnes
Waste minimisation guidelines – a programme of waste minimisation, comprising sector-specific guidance supported by awareness-raising activities.	6 tonnes	184 tonnes
Reuse schemes – building on Saint Lucia's existing reuse systems, expanding reuse to cover a wider range of common packaging items, including plastic bottles, cups and takeaway containers.	8 tonnes	451 tonnes
Waste management plan for the fisheries sector – little data exist on lost and discarded fishing gear in Saint Lucia. Development of a waste management plan will help develop a clearer understanding of the scale of the problem and a plan for implementing potential solutions.	3 tonnes	N/A

Executive Summary

Commons Seas has also assessed three additional policy options. These are those with the highest remaining potential for plastic pollution reduction, based on the waste composition and flow analysis, excluding measures already included in the ML-MAP. Modelling indicates that these three additional policies could reduce plastic pollution in Saint Lucia by a further 10% (33 tonnes) and landfilled plastic by 6% (828 tonnes) per year by 2035.

These policies target items that are common components of the waste stream and plastic pollution:

- **Reusable diaper program** to reduce the consumption of single-use diapers, a major component of the waste stream.
- **A waste minimization program** focused on households to encourage waste reduction.
- **A levy on single-use plastic bags** to encourage the use of reusable bags and reduce the consumption of both conventional plastic bags and biodegradable plastic-based single-use bags, for which there is no dedicated disposal route other than landfill.

Figure E0.2, below, shows the cumulative impact of the ML-MAP activities and three additional policies on marine plastic pollution in Saint Lucia.

Conclusions and recommendations

Our overall recommendation is that Saint Lucia implements the ML-MAP and its various component activities and policies to reduce plastic pollution by more than a quarter over the next decade.

Analysis indicates that in 2035, plastic pollution could be 28% less than that forecast under a business-as-usual (BaU) scenario if the selected ML-MAP policies are implemented. The range of other activities identified in the ML-MAP will also serve to support the implementation of these activities, alongside other supporting initiatives including:

- **A sustained public education and communication campaign** to raise awareness of the plastic pollution problem, encourage waste minimisation and maximise participation in waste segregation, recycling and reuse initiatives.
- **Monitoring and evaluation** to track progress, support enforcement efforts and allow policies to be amended and refined.
- **Financing** to fund the development and ongoing operation of new services and infrastructure, and an increased focus on funding core operational costs such as staffing and institutional strengthening.

Transitioning to a circular economy will require deeper transformation

The activities in the ML-MAP represent a key step in reducing plastic pollution. However, achieving a long-term solution will ultimately require a deeper transformation: shifting from the current linear 'take-make-dispose' model to a more circular approach, whereby consumption is significantly reduced, reuse and refill become the norm and recycling is scaled up.

The three additional policies proposed in this report - reusable diaper schemes, a plastic bag levy, and household waste minimisation guidelines - offer additional practical measures to initiate this deeper shift toward a more circular system. This kind of transformation will be essential for Saint Lucia to find a lasting solution to plastic pollution and play its part in protecting the environment, economy, and public health at both the national and global levels.

As such, we recommend that Pillar 1 Activity 1 of the ML-MAP – Develop and approve a Waste Management Policy and Strategy – be progressed as a priority. It provides the framework for a holistic approach to waste and resource management.

Saint Lucia has already demonstrated its strong commitment to tackling plastic pollution through initiatives like the phased ban on Styrofoam and selected single-use plastic food service containers. This report builds upon this foundation, highlighting that, while significant progress has been made, further ambitious action is crucial to address the growing challenge of plastic waste generation and leakage into the environment in Saint Lucia.

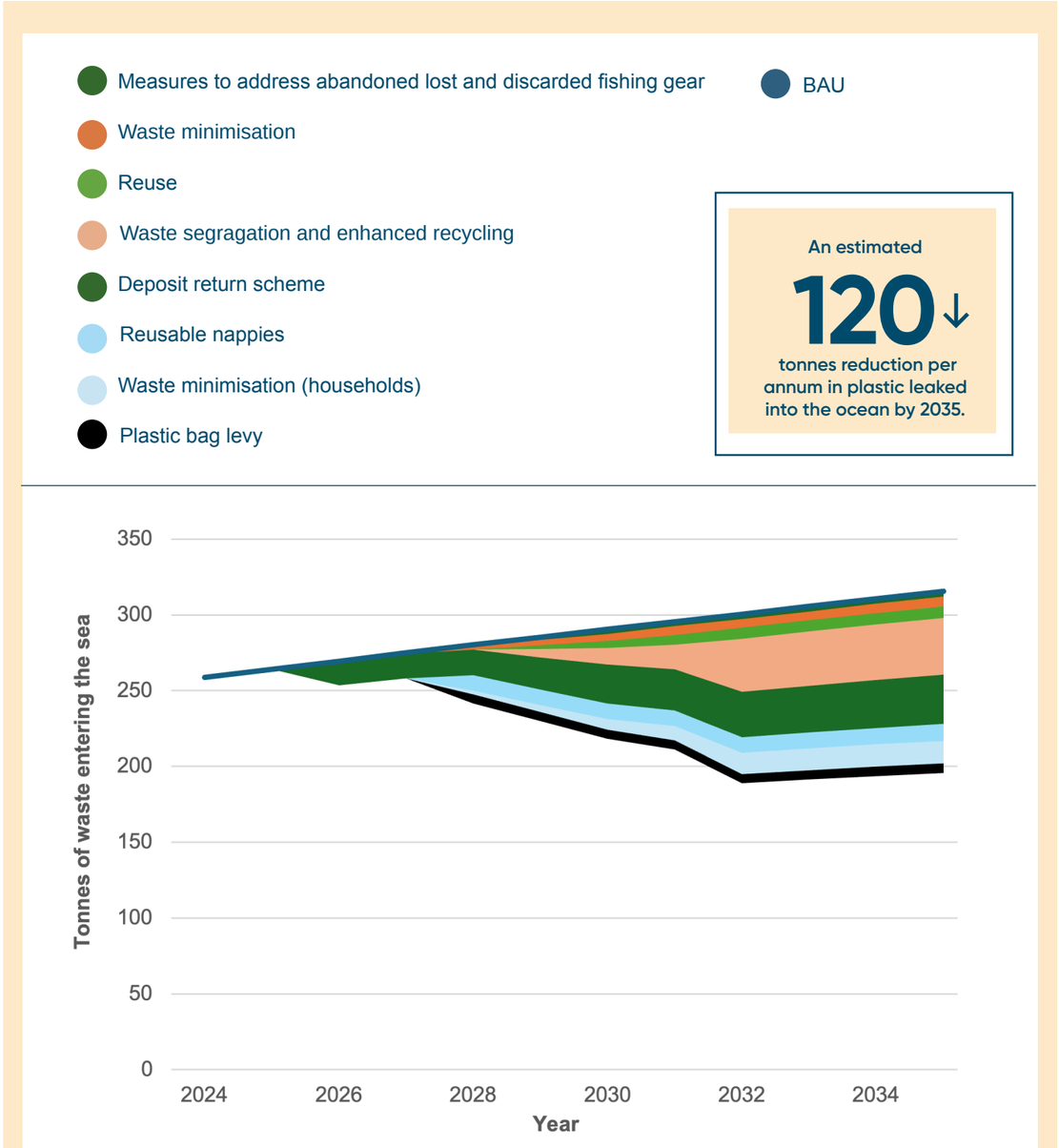


FIGURE E0.2: THE POTENTIAL PLASTIC POLLUTION REDUCTION IMPACT OF THE ML-MAP ACTIVITIES & 3 ADDITIONAL POLICIES ASSESSED IN THIS REPORT.

1 Introduction

1.1 Background

In October 2024, the Department of Sustainable Development (DSD) partnered with Common Seas. The partnership aimed to gain a deeper understanding of the scale of plastic pollution in Saint Lucia and to develop recommendations for the effective implementation of policies aimed at significantly reducing plastic waste and pollution.

This document presents the findings of a baseline assessment of plastic pollution and an analysis of the potential effectiveness of various policies in addressing plastic pollution in Saint Lucia. It also includes recommendations for implementing and enhancing a selected suite of policies to tackle plastic pollution.

1.2 Report structure

This report is structured as follows:

- **Section 2** describes the overall context in terms of plastic pollution and Saint Lucia.
- **Section 3** describes the approach used for this study, including providing further information on Common Seas' Plastic Drawdown tool.
- **Section 4** presents details of the baseline assessment of plastic pollution in Saint Lucia and describes the current estimated and potential future increases in plastic pollution if no action is taken.
- **Section 5** describes the findings of the policy analysis and presents a series of recommendations for enhancing and implementing policies.
- **Section 6** provides a summary of recommended next steps and priorities.

Additional information is provided in the appendices.

1.3 About Common Seas

Common Seas is a social enterprise that collaborates with governments and leading organisations in Small Island Developing States (SIDS) and small coastal countries to identify and accelerate the implementation of the most effective policies to reduce plastic waste and pollution.

Our approach and tools have received UN recognition and provided governments with the evidence and courage to deliver ambitious action on plastic.

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 most affected by plastic, particularly SIDS and small coastal countries, **supporting a just transition to a future freed from plastic pollution.**

This project was funded by the UK Government's Foreign, Commonwealth and Development Department with co-funding from Common Seas under its Government Partnerships programme.

For more information, please visit: commonseas.com

Partnership with Unite Caribbean

Operating in the Caribbean region for the past eight years, Unite Caribbean was our key partner in the development of the work with the Department of Sustainable Development.

The collaboration was instrumental in bringing regional and local expertise to ensure the recommendations were relevant, effective and sustainable.

Unite Caribbean has extensive expertise across linguistic and territorial borders in the Caribbean, including Saint Lucia. With expertise in supporting regional cooperation projects, Unite Caribbean's work fosters the conditions for improved knowledge and experience sharing, promoting the sustainable development of the region.

During the development of policy recommendations, Unite Caribbean played a lead role in facilitating stronger relationships with key stakeholders. This has been invaluable for ensuring the smooth coordination of activities and enhancing the credibility of our work within the community.

2 Context

2.1 About Saint Lucia

Geography and climate

Saint Lucia is a small island state in the eastern Caribbean, covering an area of 616 km2 (The Central Statistical Office of Saint Lucia, 2023). As a volcanic island, its features include a central ridge of steep-sloped mountains with 37 watersheds comprising numerous fast-flowing rivers, alongside natural forests and fertile valleys. The island is surrounded by sandy beaches along its 158km long coastline, several of which are marine protected areas with mangrove or coral marine reserves.

Across its varied ecosystems, Saint Lucia is home to over 1,300 known species of plants, over 150 species of birds, approximately 250 species of reef fish species and 50 species of coral (GoSL – Government of Saint Lucia, 2000). Several of these species are endemic and are vulnerable to the impacts of climate change and plastic pollution. The island has a year-round tropical maritime climate, with a rainy season between June and November (World Bank, 2020). It experiences frequent storms and hurricanes due to its location within the Atlantic hurricane belt.

> As a Small Island Developing State, Saint Lucia is disproportionately impacted by the **triple planetary crisis of climate change, biodiversity loss and pollution.**

History and population

Saint Lucia hosts a population of approximately 180,000 people (World Population Review, 2025). The official language is English; however, many citizens speak Saint Lucian French Creole (Kwéyòl). The majority of citizens are of Black/African descent (85.3%), around 10% are of multiple heritage, and 2% are of East Indian origin (CIA World Factbook, 2025). The primary religion is Catholicism (61.1%), but there are also various other religious groups including several Christian denominations, and Rastafarians (UNSD, 2010).

Major population centres – including Gros-Islet, Cul de Sac, Dennery, Soufriere, Micoud and Vieux Fort – are found at the coast, with the capital, Castries, located on the north-west coast of the island. Approximately 50% of the population lives within the north-western districts of Castries and Gros-Islet and around 8% live in the capital city of Castries within the Castries district (World Bank, 2024).

Economy, employment and education

Although classified as an upper-middle-income country, Saint Lucia remains eligible for Official Development Assistance (ODA). The International Monetary Fund predicts that Saint Lucia's economy will grow by 2.4% by the end of 2024.

Since the 1990s, the economy has undergone a major shift to a largely tourism-driven economy. The island welcomed a staggering 1,036,066 visitors in 2023 (The Central Statistical Office of Saint Lucia, 2023). Real estate and call centres are other leading sectors (U.S Department of State, 2023), with the agricultural sector accounting for 20% of all jobs. Saint Lucia's fisheries sector, whilst relatively small, has grown over the last decade (Government of Saint Lucia, 2018).

Employment rates reached a record high in 2024 (Government of Saint Lucia). The average income in Saint Lucia is $16,645 per annum (World Inequality Database, 2023) and GDP per capita is $14,560 (IMF, 2024).

As of 2016, 22.8% of citizens were under the age of 15. According to the 2020 Human Capital Index (HCI), a child who starts school at age 4 in Saint Lucia can expect to complete 12.7 years of school by age 18.

2.2 Plastic pollution in Saint Lucia

Plastic pollution is more than a waste issue; at every stage of its lifecycle, from production through to disposal, plastic drives the triple planetary crisis of three interconnected global environmental challenges: climate change, biodiversity loss, and pollution.

> **Plastic pollution also threatens vital industries and has far-reaching implications for human rights and health.** Below, we outline how plastics contribute to these crises.

It is crucial for stakeholders to recognize the connections between plastic pollution and other environmental, economic, and social issues to ensure that the necessary transformations to existing systems are effectively implemented.

Plastic pollution in Saint Lucia and the triple planetary crisis

Climate change

Approximately 99% of plastic begins as a fossil fuel, a major contributor to climate change (CIEL, 2017). Plastic production accounts for approximately 10% of the global annual usage of fossil fuels. Plastic is also one of the most greenhouse gas-intensive industries in the manufacturing sector, and the fastest-growing. Greenhouse gas emissions associated with plastic production are expected to account for 19% of the global carbon budget by 2040 (UNDP, 2022).

Plastic drives climate change at every stage of its lifecycle, from the greenhouse gases emitted during production, to the toxic chemicals leeched when plastics break down. Marine plastic pollution also interferes with the ocean's ability to sequester carbon, further accelerating climate change.

In Saint Lucia, as in many islands across the Caribbean, plastic pollution often accumulates in near-coastal ecosystems such as estuaries and mangroves. It also builds up in drains and other waterways. This exacerbates climate change-related flooding by reducing drainage capacity.

Small Island Developing States (SIDS) like Saint Lucia are disproportionately impacted by climate change, despite contributing little to the issue. The Government of Saint Lucia's climate modelling predicts that atmospheric temperatures will increase by 0.65 to 2.2°C by 2060, alongside increased sea surface temperatures, increased intensity in tropical storms, and sea level rise.

The cost of inaction on climate change in Saint Lucia has been conservatively calculated as 12.1% of GDP by 2025, rising to 24.5% by 2050 and 49.1% by 2100 (Climate Investment Funds, 2021).

Hurricanes as well as landslides and flooding induced by heavy rains already pose a particular threat to the country. For example, the impact of Hurricane Tomas in 2010 cost 43.4% of the island's GDP (UN-ECLAC, 2011).

Sea level rises set Saint Lucia on course to lose 34% of its sandy beaches by 2100, according to the World Bank's Country Climate and Development Report. This poses a significant threat to several of the country's key industries, including tourism and fishing – and also puts coastal populations at risk.

Biodiversity loss

Plastic pollution poses a pervasive and growing threat to biodiversity around the world. Plastic waste accumulation damages ecosystems, destroying vital habitats for species on land and in aquatic environments. It also poses serious health risks through ingestion – an issue of particular significance for Saint Lucia, where fish, turtles and birds can mistake litter for food.

Saint Lucia has a narrow coastal shelf that supports a diverse range of marine ecosystems, including coral reefs, mangroves, and seagrasses. Plastic waste often accumulates in these near-shore environments where currents are weaker, smothering reefs, mangroves and grasses and reducing their function in terms of growth, marine life feeding, and carbon sequestration.

Microplastics also contribute to ocean acidification, which further drives reef decline. Lost plastic fishing gear can capture sea creatures such as crabs and turtles. This 'ghost fishing' leads to unnecessary loss of marine creatures.

On land, microplastics leeching into soil and water can also have a negative impact on biodiversity. Recent research suggests that microplastics hinder the ability of plants to photosynthesise, with an estimated 4-11% of the world's staple crops at risk of loss (Zhu et al., 2024). This could pose a particular risk to the agriculture sector, which accounts for 20% of Saint Lucia's economy.

For example, a notable proportion of Saint Lucia's economy depends on banana exports – a sector already highly vulnerable to changes to the protected market in Europe. Reduced yield in vital crops for both sustenance and trade could have a significant impact on farming communities.

Pollution
Today, eleven million tonnes of plastic flow into the ocean every year (Pew Charitable Trust, 2020). By 2040, this is predicted to quadruple.

Plastic pollution in Saint Lucia is a growing concern, with plastic waste found littering beaches, waterways, and landscapes. The island's high reliance on single-use plastics exacerbates the problem. Plastic items such as bottles, bags, and food containers often end up in the ocean, harming marine life and damaging coastal ecosystems. This persistent pollution threatens not only the environment but also key industries like tourism and fisheries, which rely on a healthy, clean ecosystem.

Plastic pollution and socioeconomic inequities

In addition to contributing to the triple-planetary crisis, plastic pollution has significant implications for human rights and health.

Inclusion and socioeconomic equity
The negative impact of plastic pollution on agricultural productivity (discussed in Biodiversity loss, above) will disproportionately affect the poorer and vulnerable population.

In Saint Lucia, agricultural income accounts for a higher proportion of the total labour income of households in the two bottom quintiles of welfare distribution (14–15%, compared to 8–10% for quintiles 3 to 5) (World Bank, 2024).

In Saint Lucia, poverty rates are expected to rise by up to 1.9 percentage points from 2030–2050 compared to the baseline economic scenario, due to lower-bound climate change effects, to which plastic pollution contributes, on infrastructure, agriculture, and productivity (World Bank, 2024).

Gender
In Saint Lucia, women often run households and are, as a result, often more exposed to plastic products and harmful chemicals such as cleaning supplies. Women also play leading roles in key industries affected by plastic pollution. Most tourism employees in Saint Lucia are women – in fact, in 2017, the sector employed more than 16% of the country's total female workforce (IUCN, 2022a). The majority of these women work in housekeeping, food and beverage, and front office roles, which involve a higher exposure to plastic products.

Health impacts
Plastic pollution poses significant health risks. These include exposure to toxic chemicals such as BPA, which interferes with the hormone system (known as 'endocrine disruption').

In 2022, Common Seas identified microplastics in human blood for the first time (Common Seas, 2022). They have since been found in the lungs, liver, placenta, breast milk, semen and brain tissue.

While research is ongoing regarding the impact of microplastic presence in the human body, studies suggest that they can cause inflammation, cell damage, impaired immune function, reproductive issues, and several other health problems (e.g. Prata et al., 2020; Blackburn et al., 2021; Winiarska et al., 2024).

Plastic waste also collects stagnant water and serves as a breeding ground for mosquitoes that spread diseases such as Chikungunya, dengue and malaria. It encourages rodents, insects and other vectors, thereby increasing threats to human health from Leptospirosis, Hantavirus Pulmonary Syndrome, and Haemorrhagic Fever (UNEP, SLSWMA & DSD, 2022).

> In Saint Lucia, women often run households and are, as a result, often **more exposed to plastic products and harmful chemicals such as cleaning supplies.**

2.3 Existing initiatives and the Marine Litter Management Action Plan

Saint Lucia, and indeed the Caribbean Community (CARICOM), have taken an ambitious approach to tackling plastic pollution. In 2019, CARICOM adopted a regional strategy for the management of marine litter and microplastics. It was the first regional declaration of its kind that acknowledges the potential adverse impacts of increasing levels of plastics and microplastics within the Caribbean Sea and Atlantic Ocean. The declaration challenges governments to support a holistic approach to solid waste and plastic management (Nicols, n.d.).

Saint Lucia has also developed a range of initiatives to reduce plastic pollution and encourage waste minimisation, reuse and recycling. In 2019, the island introduced a phased ban on the importation, manufacturing and sale of Styrofoam and selected single-use plastic food service containers. More recently, the government has been working with stakeholders on two further actions:

- Stakeholder engagement, cost model development, and updating the draft policy for the Management of Beverage Containers Bill (see Section 5.3),

- Establishing the Plastics Coordination Committee (see Section 3.1), to be consulted on and provide feedback to all plastic-related projects in Saint Lucia.

It has also executed several plastic-related projects and pilot schemes. These include an initiative to collect PET bottles, a micro-haulers project, and joining the IUCN's Plastic Waste-Free Islands (PWFI) project, as well as a private sector-driven initiative to reduce single-use plastic bags.

Table 2.1 provides a summary of the existing and recently completed initiatives related to plastic pollution in Saint Lucia.

Central to Saint Lucia's work on reducing plastic pollution is its Marine Litter Management Action Plan (ML-MAP), which was published in November 2022 to address the pressing issue of marine litter affecting its coastal and marine ecosystems.

The primary objectives of the ML-MAP are:

- Prevent plastic waste leakage,
- Reduce marine litter accumulation in nearshore environments, and
- Enhance national and international collaboration to address both local and global marine litter challenges.

The ML-MAP is structured around five key pillars, each encompassing targeted activities to achieve its overarching goals.

- Pillar 1: Strengthen the Enabling Waste Management Policy and Regulatory Framework
- Pillar 2: Waste Minimisation
- Pillar 3: Clean-up Campaigns
- Pillar 4: Strategic Partnerships and Stakeholder Engagement
- Pillar 5: Environmental Education and Behaviour Change

The Saint Lucia Cabinet of Ministers approved the ML-MAP in January 2023. Following this approval, a national coastal clean-up guide has been developed by the DSD, and it has provided support to the International Coastal Clean-up (ICC) as part of a strategic annual coastal clean-up initiative, in line with Activity 1 under Pillar 3.

Additionally, efforts are underway by the DSD to advance the enactment of the Management of Beverage Containers Bill, which is outlined under Pillar 1 Activity 3.

The ML-MAPs pillars and corresponding activities are outlined in Table 2.2, below. The seven ML-MAP activities assessed in this report are in bold.

Table 2.1: Existing and Past Initiatives Tackling Plastic Pollution in Saint Lucia

Title	Timeline	Brief Description	Reviewed	Incorporated Date	Spoken to Author
Recently Completed					
IUCN's Plastic Waste Free Islands Project	**2019–2023**	**Focused on identifying opportunities for reducing plastic pollution and creating plastic waste value chains for local businesses. Included extensive baseline data collection, an assessment of the existing policy environment in Saint Lucia. Data from this project were used to inform the plastic share of total waste generated and to verify the composition of plastic waste generated.**	✓	✓	✓
RePLAST-OECS	**2019–2023**	Tested the acceptance of waste separation, and removal of plastic in the environment (i.e. clean up) through a sponsored incentive recycling program. Information from this study informed assumptions around levels of plastic recycled.	✓	✓	✓
OECS Reduction in Marine Litter (ReMLit) project	**2021**	Sought to reduce solid waste reaching the marine environment in the capital city of Castries by improving storage and collection services in unplanned developments. The project sought to replace communal bins with kerbside collection systems in communities that were inaccessible to refuse collection vehicles. Information from this project informed assumptions around the managed waste system.	✓	✓	X
GPML-Caribe Project	**2019–2021**	In Saint Lucia, this project involved engaging stakeholders to identify the main sources of marine litter, prioritize interventions, and establish actionable strategies to combat the problem through the development of a Marine Litter Management Action Plan.	✓	✓	X
Recycling in the Eastern Caribbean (Recycle OECS)	**2022–2024**	Recycle OECS is a continuation of the ReMLit project, and is focused on designing a sustainable waste separation, collection and recycling model, including the required infrastructure, with demonstration projects in two member states. In Saint Lucia, it also seeks to provide support towards the sustainability of the existing plastic collection system. As above, information from this study informed assumptions around levels of plastic recycled.	✓	✓	✓
Ongoing					
GEF Islands Regional Policy Development Project	**2023–2025**	Seeks to strengthen regulatory frameworks, enhance public awareness, and increase local capacity to handle complex waste management issues across 12 participating countries. The project is developing a regional model policy for the management of various waste streams, including plastic, and draft legislation to support implementation that can be adapted to individual country needs.	✓	**X (No data relevant to the baseline model – although regional model policy will be assessed in policy analysis section of report)**	X
IUCN's Closing the Caribbean Plastic Tap: Propelling Caribbean SIDS Towards a Plastic-Free future	**2024–ongoing**	Aimed at reducing plastic waste generation and leakage by implementing effective, socially inclusive solutions to advance circular economy in five Caribbean Small Island Developing States (SIDS), including Saint Lucia.	✓	**X (Not currently in implementation phase, so no data available for baseline model)**	✓
Testing of inventory guidance of plastic waste and testing of technical guidelines on the ESM of plastic waste project	**2024–2025**	This project aims to demonstrate the applicability of the Basel Convention's Technical Guidelines in different regions. In Saint Lucia, the main objective of this project is to develop a national inventory of plastic waste generation, and an assessment and recommendations report on the country's national baseline as it relates to Modules B, C, F and J of the Technical Guidelines. We have used the data from this project as a point of triangulation, noting that the data underlying this analysis is more current and granular than the data which is obtainable from Comtrade.	✓	✓	✓

Table 2.2: ML-MAP Activities (those in **bold** are analysed in this report)

ML-MAP Pillars	Corresponding Activities
Pillar 1: Strengthen the Enabling Waste Management Policy and Regulatory Framework	1. Develop and approve a Waste Management Policy and Strategy
	2. Conduct an assessment of the economic, environmental and social aspects of waste recovery and recycling to inform policy and regulatory control and promotion
	3. Finalise and enact the Management of Beverage Containers Bill
	4. Finalise the Marine Pollution Management Bill and submit for enactment
	1. Establish a mechanism to manage data collection, analysis, archiving and retrieval
Pillar 2: Waste Minimisation	**1. Develop a programme for waste segregation in one of the eleven waste collection zones**
	2. Develop guidelines and standards for waste minimisation and segregation at hotels, commercial and institutional establishments and manufacturing operations
	3. Develop and implement a programme to promote the recovery, recycling and reuse of specific waste streams
	4. Develop a national programme to encourage composting
	5. Engage DCA to include waste minimisation plans in development applications
	2. Develop and implement a waste management plan for the fisheries sector to include the return of damaged gear
Pillar 3: Clean-up Campaigns	1. Design and execute annual coastal clean-up activities
	2. Design and execute clean-up activities for rivers, waterways, roads
	3. Design and execute community clean-up programmes
Pillar 4: Strategic Partnerships and Stakeholder Engagement	1. Create ad-hoc groups to develop waste management strategies and action plans for key sectors
	2. Collaborate with constituency councils and other community groups, youth, environmental and student clubs and the private sector to promote community-level responsible waste management
	3. Continue and expand, where possible, collaboration with regional and international partners in waste management
Pillar 5: Environmental Education and Behavioural Change	1. Develop a comprehensive environmental education programme with a focus on driving behavioural change toward waste management, plastic pollution and marine litter

2.4 Co-benefits of tackling plastic pollution

Achieving a just transition to circular systems will involve labour adjustment, sustainable economic policies, and strong social support programmes to avoid unintended impacts to citizens

There are multiple intersections between plastic pollution and other environmental, health, and socioeconomic challenges. By considering these, the Government of Saint Lucia can implement the policies recommended in this report in a way that presents multiple co-benefits for Saint Lucia and its people.

Some of these potential co-benefits include:

- Adaptation strategies to prevent plastic from worsening climate change-induced extreme weather
- Protecting vulnerable ecosystems and preserving biodiversity
- Creating new jobs and boosting employment
- Preventing further contamination in food systems and agriculture
- Empowering women
- Educating the next generation for environmental resilience

Environmental co-benefits: spotlight on water security

During the implementation of these policies, stakeholders should work closely with the Water and Sewerage Company (WASCO) to ensure that their approaches align with existing water management initiatives. Coordinated efforts will help to integrate the policies with the company's water management plans.

In particular, there are several opportunities to strengthen policies that could be realised by identifying convergence between the actions discussed in this document and Saint Lucia's Sectoral Adaptation Strategy and Action Plan for the Water Sector.

- Strategic Objective 3 - 'Improve wastewater management to reduce pollution and increase water availability under a changing climate' - could be enhanced through the inclusion of considerations of how plastic pollution impacts Saint Lucia's water systems
- Testing for microplastics and plastic-related chemicals could also strengthen Strategic Objective 4: 'Set and scale-up water quality and pollution control in a changing climate'
- Taking a holistic approach to plastic pollution and water systems is essential to mitigating the most severe impacts of climate change

With the increasing frequency of hurricanes and flooding, water supply infrastructure may become more vulnerable to damage. Plastic pollution could exacerbate this risk, creating damage that will further worsen the impacts of these extreme weather events, and pose health risks to communities.

Through close consultation with stakeholders across Saint Lucia's water and waste management sectors, the strategies outlined in this report can support existing work to safeguard water quality and security.

Economic co-benefits: spotlight on key industries

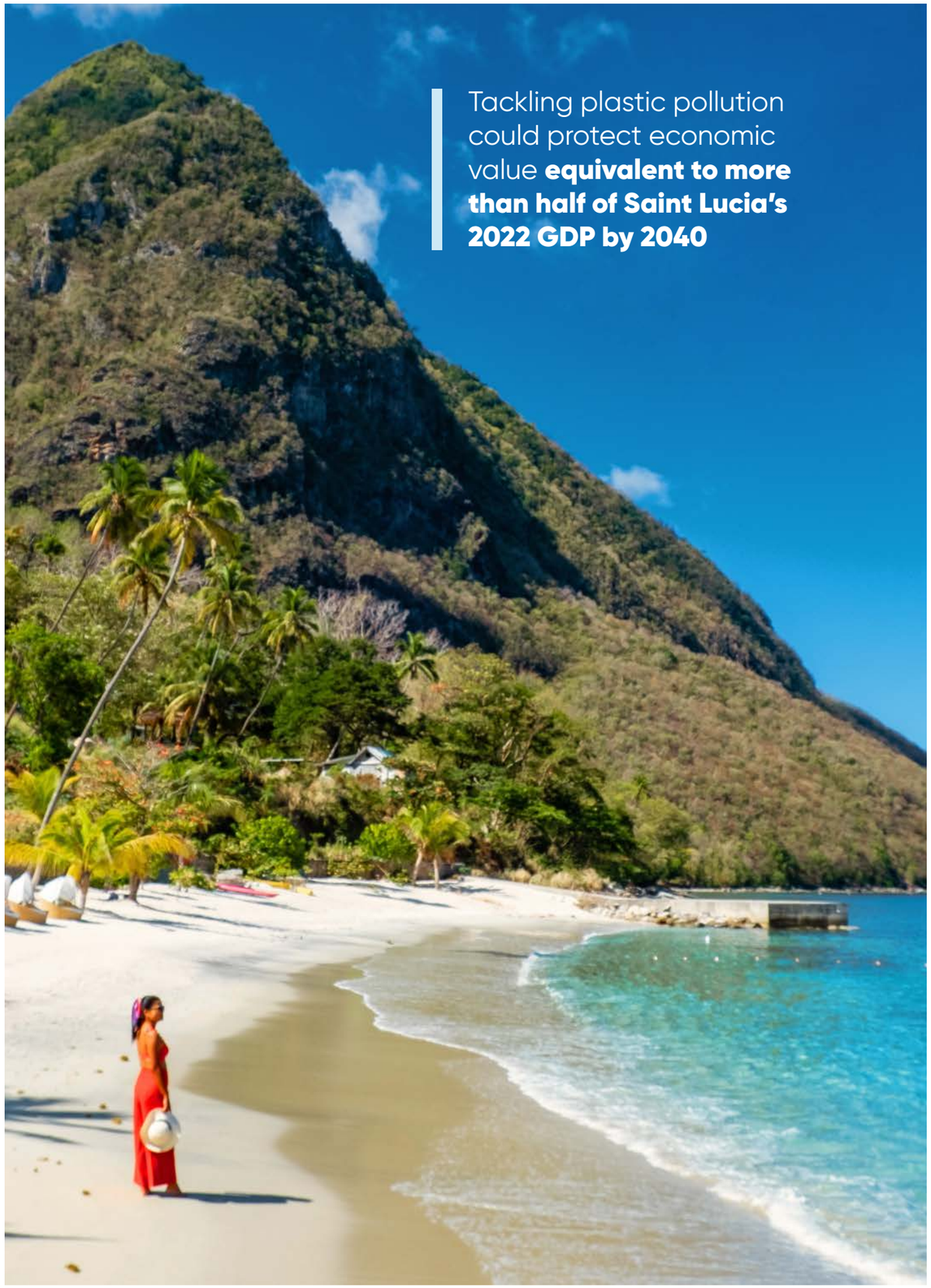
Plastic pollution poses a serious yet understated threat to Saint Lucia's economy. Under a business-as-usual scenario in which plastic pollution continues to grow unchecked, the cumulative impact of plastic waste will place a significant burden on government finances and a considerable drag on two of Saint Lucia's most important economic sectors: tourism and fisheries.

Addressing plastic pollution now is therefore a direct way to safeguard public finances and sustain growth in these vital sectors.

Tourism revenue gains and lower maintenance costs

Tourism already supports almost four out of every five jobs in Saint Lucia and accounts for roughly two-thirds (68.1%) of GDP (UNDP, 2022). The aesthetic value of the island's beaches and marine areas plays a central role in attracting visitors, yet plastic pollution severely undermines this appeal.

Littered shorelines, floating debris, and degraded marine habitats have been found to act as a strong deterrent, resulting in fewer international visitors (Ballance et al., 2000; Krelling et al., 2017) and significant revenue losses for hotels, restaurants, and tour operators. Combating plastic pollution can help to avert these losses and preserve the vitality of Saint Lucia's tourism sector.



> Tackling plastic pollution could protect economic value **equivalent to more than half of Saint Lucia's 2022 GDP by 2040**

A more profitable, resilient fisheries sector
Removing plastic at source prevents the gear damage, 'ghost fishing' losses, and habitat degradation that currently erode fishing incomes. Each dollar invested in prevention could lead to cost savings through avoided gear replacement.

Healthier reefs and mangroves also support eco-tourism activities such as snorkelling and sport fishing, creating new revenue streams for coastal communities.

Fiscal savings and green job creation
Tackling plastic waste generation and leakage reduces the government's landfill, drainage, and marine debris management costs over time. Additionally, reuse systems and local collection as well as the sorting and remanufacturing of plastic waste generate skilled jobs, diversifying employment beyond the seasonal peaks of traditional tourism.

Recent IUCN modelling makes the opportunity explicit: preventing the projected build-up of plastic could protect economic value equivalent to more than half of Saint Lucia's 2022 GDP by 2040 (IUCN, 2022b).

In short, every policy that keeps plastic out of nature is also a growth policy – one that safeguards the island's brand, secures livelihoods on land and sea, and frees up public funds for health, education, and climate adaptation.

Social co-benefits: spotlight on empowering women
Women play a central role in influencing consumer choices and have a high presence in Saint Lucia's key industries. Their strong representation in key sectors affected by plastic pollution makes it particularly important to involve them meaningfully during the policy development process. This ensures that policies take account of their knowledge and experience and that they address the potential impacts of policies on women.

A 2022 IUCN survey of Caribbean stakeholders showed that the respondents believed women were significantly more likely to take action on plastic pollution than men (IUCN, 2022a). However, the same survey also found that 27% of respondents in Saint Lucia believe that single-use plastics reduce the burden of domestic work for women.

Policymakers should address this perception when implementing the policies of this report, ensuring that new strategies are developed in ways that do not add to the gendered labour typically performed by women. Doing so will achieve a higher level of buy-in from women in transitioning their households towards sustainable alternatives to plastic where available.

Policymakers should also consider how to protect women's unique position within key industries, and the additional challenges they may face in the workplace. This will be key to preventing additional financial burden for women who work in industries reliant on plastic products, which may initially be cheaper than new alternatives.

The World Economic Forum's Guide to Ensure Gender-Responsive Action in Eliminating Plastic Pollution includes four recommendations that policymakers can use to achieve gender equality co-benefits in the implementation of the policies in this report:

- Meaningfully involve women when planning, implementing and evaluating projects.
- Establish accountability at the leadership level for gender mainstreaming across projects and sectors.
- Incorporate capacity building on gender intersections and co-benefits with staff, project implementers, evaluators, clients, beneficiaries, and other stakeholders.
- Collect and publish gender-disaggregated data on the impacts of solutions, with transparent monitoring processes.

Implementing the policies in this NAP through a gender-informed lens will not only increase the likelihood of success and longevity but will also highlight opportunities to strengthen social and health protections for women in the workplace and beyond.

3 Approach

3.1 Overview

The approach applied by Common Seas comprises two main parts:

1. **Baseline assessment**
2. **Policy analysis**

These two steps are described in more detail in Sections 3.2 and 3.3 below.

The analysis was underpinned by the Common Seas' Plastic Drawdown tool, which was developed in consultation with 24 governments, more than half of which are SIDS.

> Plastic Drawdown has been peer-reviewed and published in the *Global Environmental Change Journal* (Royle et al., 2022).

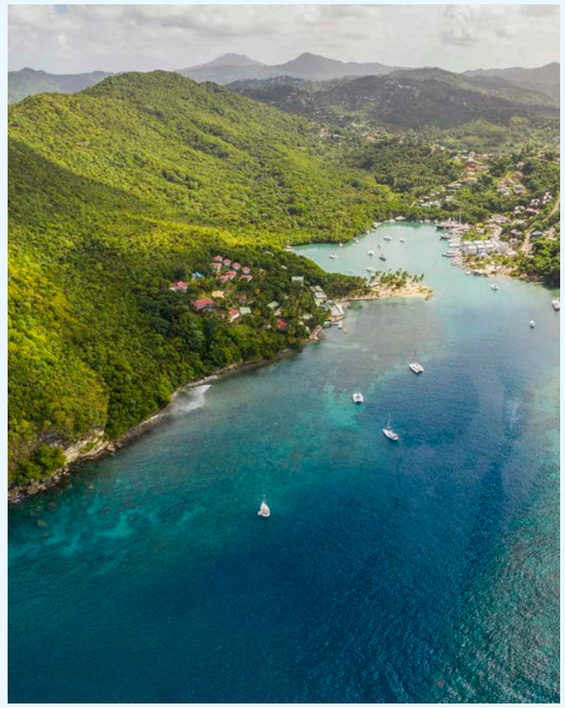
Common Seas' technical team used the Plastic Drawdown tool to model how macroplastic and microplastic material flows through waste pathways in Saint Lucia. The tool quantifies plastic waste flows through waste management systems and leakages into the terrestrial and aquatic environments.

The team used Plastic Drawdown to:

- Describe the composition of Saint Lucia's plastic waste
- Understand how much waste becomes plastic pollution
- Explore how the problem will change over time
- Analyse the impact of plastic-related policy

For the purposes of this study, the tool was tailored to the characteristics of Saint Lucia's economy and waste management system. See Box 1 for more information on Plastic Drawdown.

The Saint Lucia Plastics Coordination Committee (PCC), a group of key stakeholders across the Saint Lucia plastics value chain, provided oversight for the project. The Plastics Coordination Committee comprises cross-governmental departments, representatives from manufacturing and retail, CSOs and NGOs. The Committee reviewed key project outputs (the baseline assessment and policy analysis) and provided guidance and insight during the study. Members of the committee are presented in Box 2.



Box 1

Overview of Common Seas' Plastic Drawdown Tool

The Plastic Drawdown tool uses a material flows approach to consider how plastic waste moves through Saint Lucia, from the point of generation as waste, to its potential release into the environment.

This allows the plastic pollution problem to be illustrated as a flow diagram, with the course of different types of plastic along each part assessed and quantified. The model incorporates 76 flows. For a comprehensive flow diagram illustrating these flows, please see Appendix B.

1-DESCRIBE THE COMPOSITION OF SAINT LUCIA'S PLASTIC WASTE

The model used country-level waste data and item-specific consumption data to gauge the total waste produced. It categorised the waste flows of the 24 plastic items that account for 95% of coastal litter. This includes single-use plastics, sanitary items, household goods, fishing gear and construction plastics.

It incorporated a breakdown by item type, and waste categories which are modelled separately to account for the differences in their respective consumption patterns, end-of-life outcomes and flows through different pathways. It also estimated micro-plastic generation from tyre-wear, brake-wear, clothing fibres, pellets, and microbeads.

2-UNDERSTAND HOW MUCH WASTE BECOMES PLASTIC POLLUTION

The team used Plastic Drawdown to create a material flow analysis that measures the amount of plastic waste flowing into the ocean from Saint Lucia, and what remains on land. It also quantified plastic waste that is recycled, incinerated, sent to landfill and exported where applicable.

3-EXPLORE HOW THE PROBLEM WILL CHANGE OVER TIME

The team then used Plastic Drawdown to forecast a Business as Usual (BaU) scenario projected between 2024 and 2035 for waste generation and plastic pollution. The BaU scenario assumes no further action is taken to address plastic pollution and that current policies, infrastructure, and behaviours remain the same.

4-ANALYSE PLASTIC-RELATED POLICY

Once the baseline study had been refined and validated, the team analysed the total and yearly reductions in plastic pollution that could be achieved by the eight policies being reviewed.

This was used to visualise the combined reductions achievable by different policy strategies and the remaining plastic pollution after policy interventions, as shown in the wedge diagram in Figure 3.1.

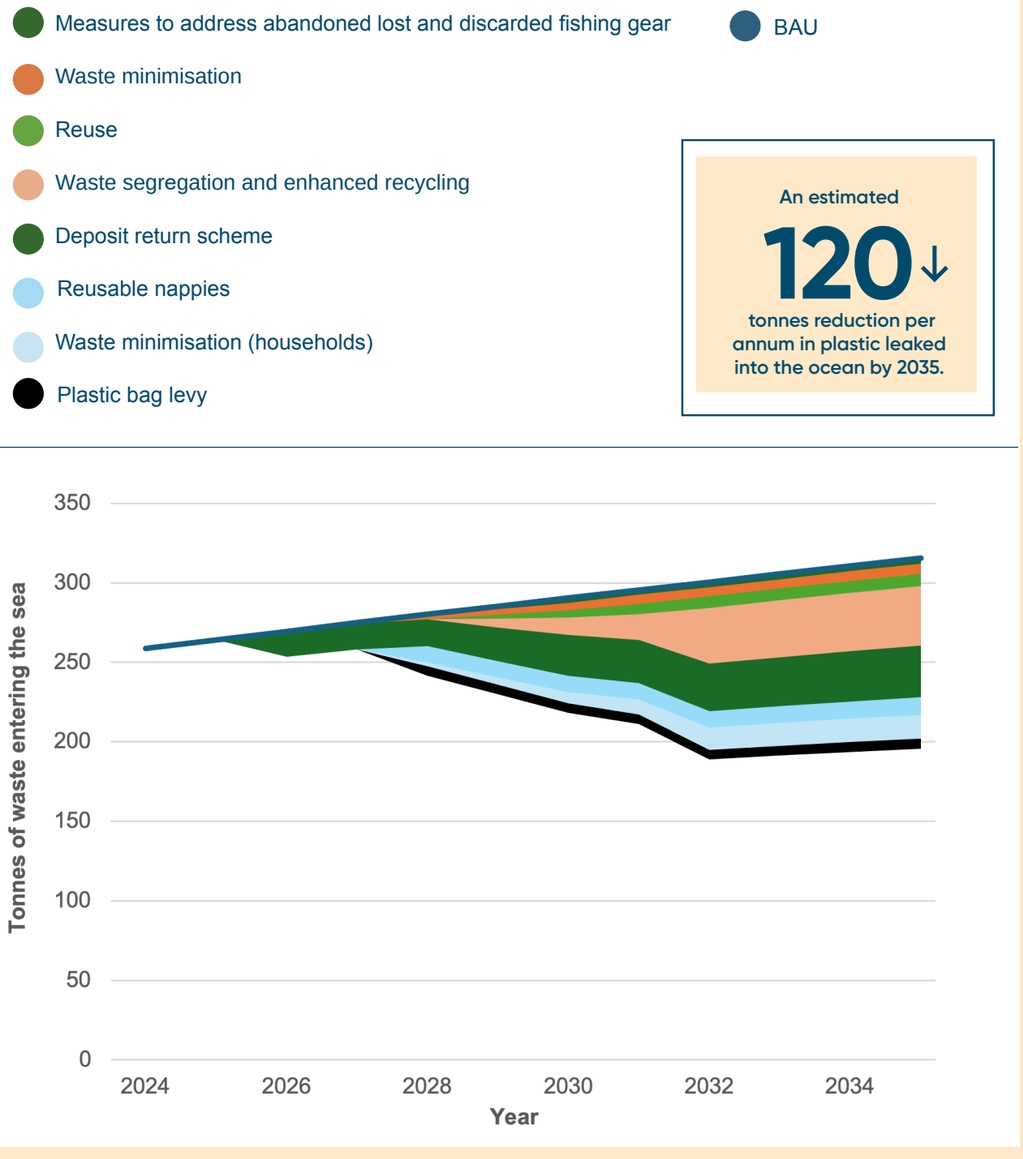


FIGURE 3 1: SAINT LUCIA'S PLASTIC DRAWDOWN WEDGE DIAGRAM

Box 2

Members of the Plastics Coordination Committee

- Saint Lucia Solid Waste Management Authority (SLSWMA)
- Saint Lucia Water and Sewerage Company (WASCO)
- Saint Lucia Manufacturers' Association (SMA)
- Saint Lucia Hospitality and Tourism Association (SLHTA)
- Coalition of CSOs for Sustainable Development
- Ministry of Education, Sustainable Development, Innovation, Science, Technology and Vocational Training
- Department of Education
- Department of Sustainable Development
- National Conservation Authority (NCA)
- Customs and Excise Department
- Department of Fisheries
- Environmental Health Department
- Soufriere Marine Management Association (SMMA)
- Saint Lucia National Trust (SLNT)
- Ministry of Finance, Economic Development and the Youth Economy
- Saint Lucia Chamber of Commerce

3.2 Baseline study

Common Seas developed the plastics pollution baseline study presented in this report by reviewing a wide cross-section of available data on plastic products and waste generation in Saint Lucia and the Caribbean region. This included studies and initiatives conducted in Saint Lucia over recent years.

Table 2.2 summarizes the recently completed and ongoing initiatives related to plastic and solid waste management in Saint Lucia, which Common Seas consulted in developing the baseline model presented in this report. Further information on relevant legislative instruments can be found in Appendix C.

Stakeholder engagement was a key part of the process, including interviews with individuals and organizations across the plastics value chain (see Appendix A for a full list of interviewees). These consultations offered valuable contextual insights and expert perspectives, helping to address data gaps and provide a comprehensive understanding of Saint Lucia's plastic waste management system.

The market research firm Fact MR supplied market data on the quantities and types of plastic products placed on the market in Saint Lucia, and the projected growth of relevant product and packaging markets over the modelled timeframe.

Common Seas used these diverse information sources to model plastic waste generation and flows, using Plastic Drawdown (see Section 3.1 and Appendix B). The diverse data sources also allowed estimation of the proportions of plastic waste managed by the existing waste management infrastructure, and the proportion of plastic waste that escapes into the environment.

The team then forecast the growth in plastic waste generation and plastic pollution over the coming 11 years (between the baseline year of 2024 and 2035) under a 'Business as Usual (BaU) scenario. The BaU assumes no further action is taken to address plastic pollution and that current policies, infrastructure, and behaviours remain the same.

The Department of Sustainable Development and the PCC reviewed the draft baseline in February and March 2025. The baseline model was then refined and finalised so that it could serve as a basis for the analysis of selected policies.

3.3 Policy analysis

The waste hierarchy informs Common Seas' approach to developing a comprehensive set of policies to address plastic pollution on land and at sea. Our approach combines both upstream and downstream measures drawn from across the waste hierarchy (as shown in Figure 3.2 below) to support the transition from a linear, take-make-dispose model to a circular economy. In a circular economy, waste and resource consumption are minimised by keeping products and materials in use for as long as possible. This model shifts the focus toward resource efficiency, durability, and regenerative practices.

Ambitious upstream policies — such as those promoting reuse, and waste prevention — drive a meaningful reduction in plastic waste generation and contribute more effectively to systemic change. Shifting to a new circular system requires time, planning, investment, and education to support large-scale behavioural change. In the short to medium term, downstream waste management and policy interventions remain crucial to ensuring waste is collected and disposed of responsibly to prevent unnecessary leakage into the environment.

Therefore, alongside upstream policies aimed at reducing plastic consumption, this plan also addresses the entire lifecycle of plastic waste management — from importing and processing to final use, collection, and disposal.

Common Seas used the Plastic Drawdown tool to conduct a quantitative analysis of the potential of different policies to 'draw down' forecast plastic pollution over time (as estimated by the baseline assessment). The outputs of the policy analysis are visualised as 'wedge diagrams' which illustrate the forecast increase in plastic pollution under the BaU scenario and the effect of the different policies in the form of wedges of reduction potential (see Figure 3.1). The policy analysis drew on a global literature review of the effectiveness of different plastic policies, alongside stakeholder insights.

To tailor the analysis to DSD's needs and maximize its value to the department, initial discussions helped identify key areas of focus for this policy review. At the DSD's request, the policy analysis considered one existing policy (the Styrofoam and Plastic Food Service Containers (Prohibition) Act in Section 5.2) and a selection of activities set out in Saint Lucia's Marine Litter Management Action Plan (see Sections 5.3 – Section 5.7).

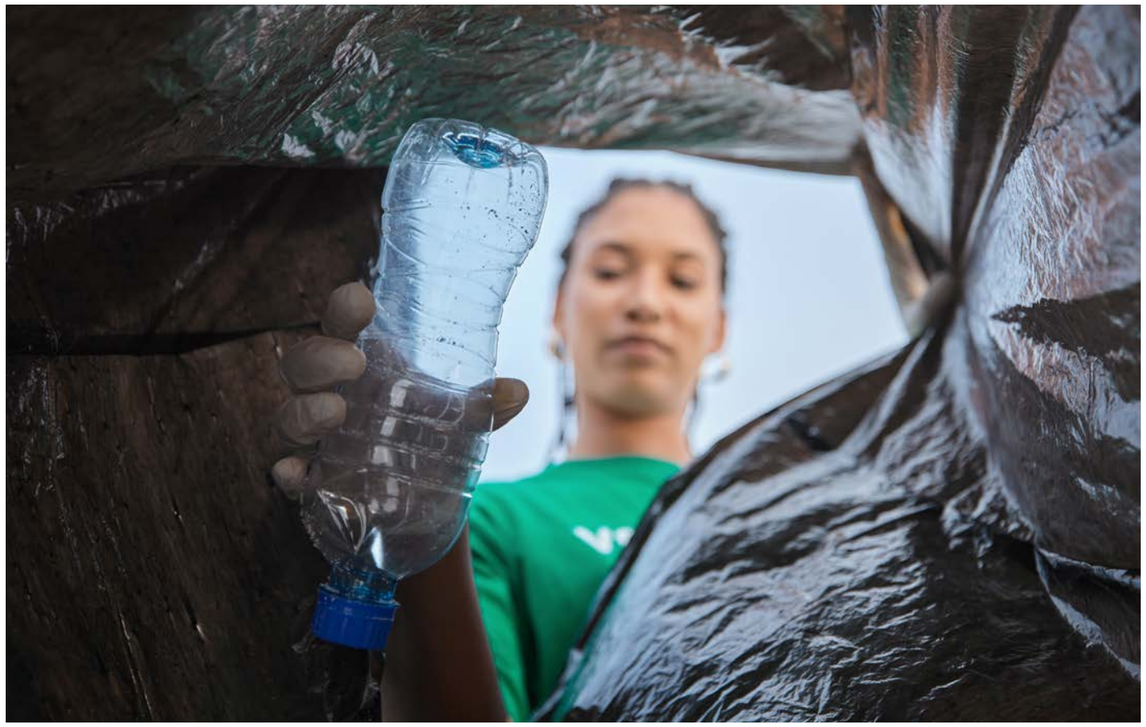


Figure 3 2 The waste hierarchy

The activities described in the ML-MAP cover three main areas:

- waste minimisation,
- reuse, and
- source segregation recycling

They relate to several sectors (households, hotels, commercial and institutional establishments, manufacturing operations, the construction sector and fisheries). For the purposes of this analysis, the activities have been described in terms of six main policies:

- **Styrofoam and Plastic Food Service Containers (Prohibition) Act**
- **The Management of Beverage Containers Bill.**
- **Waste segregation and recycling** for households and hotels, commercial and institutional establishments and manufacturing operations, and for the construction sector.
- **Waste minimisation** for hotels, commercial and institutional establishments and manufacturing operations, and for the construction sector
- **Reuse schemes** focusing initially on consumer packaging
- **Waste management plan for the fisheries sector**

Common Seas also undertook a review of two other related policies (see Section 5.8):

- Marine Pollution Management Bill; and
- Draft Control of Plastic Pollution Law.

In addition, based on experience in similar contexts, Common Seas explored three other policies that could allow Saint Lucia to take a more ambitious approach to tackling plastic pollution and implement a wider range of policies and initiatives to further reduce the escape of plastic into the environment (see Section 5.9).

3.4 Stakeholder workshop

The policy analysis and recommendations presented in this report are grounded in valuable input from key stakeholders across Saint Lucia's plastic value chain. These stakeholders provided insights during a dedicated one-day, in-person workshop, as well as through several follow-up small group meetings held in Saint Lucia during the week of February 24th, 2025. This engagement process enhanced understanding of the challenges, opportunities, and critical considerations related to the policies under review, and played a central role in shaping the final analysis and recommendations.

Figure 3 3 Break out group activity during the in-person workshop in Saint Lucia, February 2025

4 Baseline assessment

4.1 Plastic waste generation

Summary

This section presents estimates of the quantities and types of plastic waste generated in Saint Lucia (note that this is not equivalent to quantities of plastic pollution, which are described in Section 4.3).

The key findings are:

- Saint Lucia generated approximately 12,000 of macroplastic waste in 2024. Equivalent to approximately 11,600 shipping containers full of plastic waste.[3]
- Under existing policies, this is expected to grow to 14,600 tonnes in 2035.
- This equates to over 153,000 tonnes of plastic waste needing to be landfilled over this period, creating considerable pressure on Saint Lucia's sole landfill at Deglos.
- The five most common items account for nearly 3,000 tonnes of plastic waste generated and are thought to be:
    - Beverage bottles (1377 tonnes)
    - Other plastic bottles (788 tonnes)
    - Plastic bags (298 tonnes)
    - Diapers (247 tonnes)
    - Single-serve sachets (245 tonnes)
- Single-use plastics accounted for approximately half of the macroplastic waste generated in Saint Lucia.
- Total microplastic generation was estimated at 95 tonnes in 2024 and comprised mainly of vehicle tyre and brake wear and clothing fibres.

Table 4.1 summarises the estimated total plastic waste generated (macro- and microplastics) for the baseline year, 2024 and for 2035.

Table 4.1: Plastic waste generation estimates under a Business-As-Usual scenario (2024-2035)

Year	Macroplastic waste generated	Macroplastics landfilled	Microplastics generated
2024	12,000 tonnes	11,540 tonnes	95 tonnes
2035	14,600 tonnes	14,040 tonnes	125 tonnes

Total quantities

Saint Lucia produced an estimated 12,000 tonnes of macroplastic waste in 2024. This is the equivalent of 67 kg per person per annum or 0.18 kg daily. Total municipal waste generation in Saint Lucia is higher than that of several other countries in the region (1.21 kgs of waste is generated per person per day in Saint Lucia, vs. 0.83 kgs in Grenada and 0.9 kgs in Antigua & Barbuda) due to higher living standards and the importance of the tourism industry to the local economy (IUCN, 2021). It has been estimated that 14% of the total plastic generated is from tourism, with tourists producing three times the amount of waste of local residents per capita (APWC, 2021).

Furthermore, around 3% of total waste disposed of in Saint Lucia comes from cruise ships. Saint Lucia disposes of a disproportionate share of waste from cruise liners as it is a considerably cheaper destination in which to dispose of waste compared to other jurisdictions in the Caribbean.

Figure 4.1 provides a breakdown of plastic waste generation by application. Packaging materials are the largest component of plastic waste, accounting for 33% of the total waste generated. 'Other' unclassified materials are the next largest, at 26%. This includes plastics used in the transportation sector, along with a diverse range of plastics which cannot be assigned to other categories. The next largest types of material are 'Building and Construction' and 'Consumer and Institutional Products', accounting for 13.7% and 12.4%, respectively.

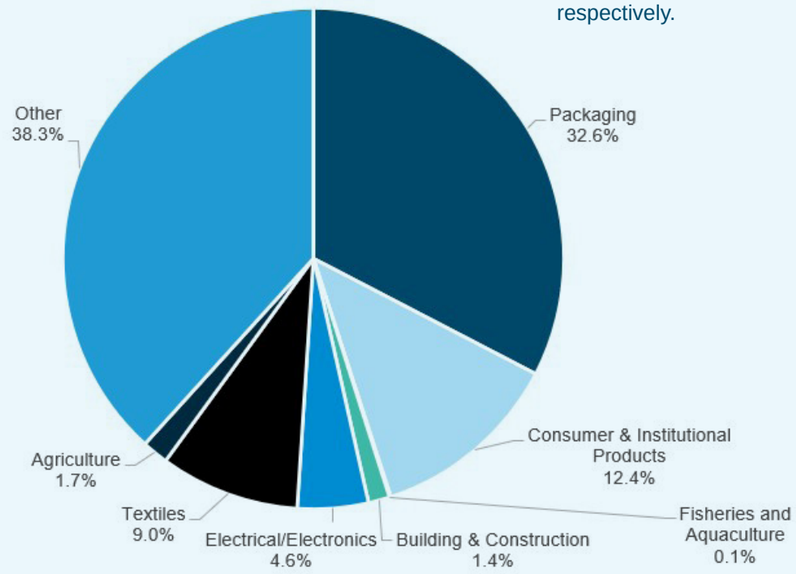


Figure 4 1: Breakdown of plastic waste generation by application (2024)

[3]This estimate is based on uncompacted waste densities and the volume of a standard forty-foot shipping container (67 m3).

4 Baseline assessment

Types of plastic waste generated

Table 4.2 summarises the most common identifiable items that modelling indicates formed part of the plastic waste stream in 2024.

The model has identified beverage bottles (e.g. juice, water, soft drinks) as a key item of concern due to high levels of tourism and, although WASCO provides assurance that tap water is potable across the island, there is a local preference for drinking bottled water. These bottles are used in high quantities and are commonly littered.

Table 4.2: Most common identifiable plastic items generated in Saint Lucia in 2024

Category	Item	Weight (tonnes)	Share of total plastic waste (%)
Packaging	Packaging total	3,917	32.6
	Beverage bottles	1,377	11.3
	Other plastic bottles (oil, bleach, etc.)	788	6.4
	Plastic bags	298	2.4
	Single-serve sachets	245	2.0
	Food wrappers (candy, chips, etc.)	234	1.9
	Bottle caps (plastic)	132	1.1
	Cups, plates (plastic)	102	0.8
Sanitary products	Sanitary products total	526	4.4
	Diapers	247	2.0
	Wet wipes	149	1.2
	Sanitary pads	108	0.9

Single-use plastics

Single-use plastics (SUPs) are a particularly problematic source of plastic waste. These items pose a higher risk to the environment than other plastic items. Their relatively lightweight nature, particularly bags and wrappers, presents challenges for solid waste management.

They are more likely to be littered and carried into the environment by wind and rain, where they can accumulate in drains and increase the risk of blockages that lead to flooding. This, in turn, can contribute to increased levels of plastic pollution.

In response to the challenges posed by SUPs, the Saint Lucian government enacted the Styrofoam and Plastic Food Service Containers (Prohibition) Act (No. 22 of 2019). This legislation prohibits the import, manufacture, sale, use and distribution of listed Styrofoam and single-use plastic food containers, including hinged food containers, utensils, trays and stirrers.

Market research data from Fact.MR indicate that this has markedly curtailed Styrofoam imports into Saint Lucia. However, the impact on prohibited plastic food containers is less definitive, as market data reveal that some quantities are still being imported into Saint Lucia. This discrepancy may, in part, stem from incorrect HS codes being applied to eco-friendly alternatives. The effects of this act are captured in our 2024 baseline finding estimates, as it was implemented following a phased approach, from 2019 to 2022.

In addition to government actions, corporate initiatives have also contributed to addressing SUPs in Saint Lucia. For example, Massy Stores Saint Lucia, a leading Saint Lucian supermarket chain, has voluntarily transitioned to using biodegradable plastic bags over recent years. Waste composition data prior to our baseline year of 2024 indicates a noticeable reduction in plastic bag volumes in Saint Lucia, although they continue to be used in relatively large quantities.

Despite these efforts, we estimate that single-use plastics still account for approximately half of all plastic waste generated in Saint Lucia.

Fishing gear

As of December 2023, there were 1,725 active fishers, and 593 vessels registered in Saint Lucia. Typical fishing vessels are less than 10m long, non-decked open fiberglass hulls, powered by outboard motors ranging from 60-100 hp (Bealy, 2021). Most fishers in Saint Lucia are artisanal, typically conducting day fishing trips. There are currently 17 active landing sites along the Saint Lucian coastline (ibid).

Although it does not account for a significant share of the waste generated, fishing gear is a category of particular concern due to the high incidence of it being lost or disposed of directly into the ocean. While a proportion of terrestrial litter may be intercepted via street sweeping and drain cleaning activities and thus re-enter the waste management system, this is not the case for fishing gear that is lost or abandoned at sea.

Information on the quantity and type of plastic fishing gear that is used in Saint Lucia is limited, and this report was based upon an assessment of Saint Lucia's fisheries sector by the World Bank (World Bank, 2019). We have used an indicative estimate of 11 tonnes per year based on the typical scale of plastic fishing gear waste generated in comparable jurisdictions.

Microplastics

Total microplastic generation in 2024 was estimated at 95 tonnes. This consisted of:

- Tyre and brake-wear particles (75 tonnes)
- Clothing fibres (14 tonnes)
- Microbeads (4 tonnes)
- Pellets (3 tonnes)

Microplastics primarily comprise particles from vehicle brake and tyre wear and are released directly into the environment.

Fibres from washing plastics-based clothing, and microbeads which are contained in wash-off cosmetics and toiletries in jurisdictions where they are not banned, such as in Saint Lucia, are released into the wastewater system. Pre-production pellets are the main input material used in the manufacture of plastic products. They are commonly released accidentally during transportation and handling.

Projection of future waste generation

Our baseline scenario incorporates the Styrofoam and Plastic Food Service Containers (Prohibition) Act, 2019. Yet without further policy intervention, plastic waste generation is still expected to grow significantly, from 12,000 tonnes per year in 2024 to 14,600 tonnes per year in 2035 (see Figure 4.2). This equates to 159,900 tonnes of plastic waste generated over this period. These waste generation outcomes form our 'Business as Usual' scenario throughout our modelling process.

Over our forecast period, population growth is expected to taper off, yet waste generation is still expected to grow due to the projected growth of product and packaging markets. (Fact.MR, 2024).

As Saint Lucia's sole landfill at Deglos approaches the end of its expected life – the SLSWMA estimates that it may have between six and eight years of capacity remaining – this will place considerable additional strain on Saint Lucia's waste management systems, with an expected 153,700 tonnes of plastic waste being landfilled over this period.

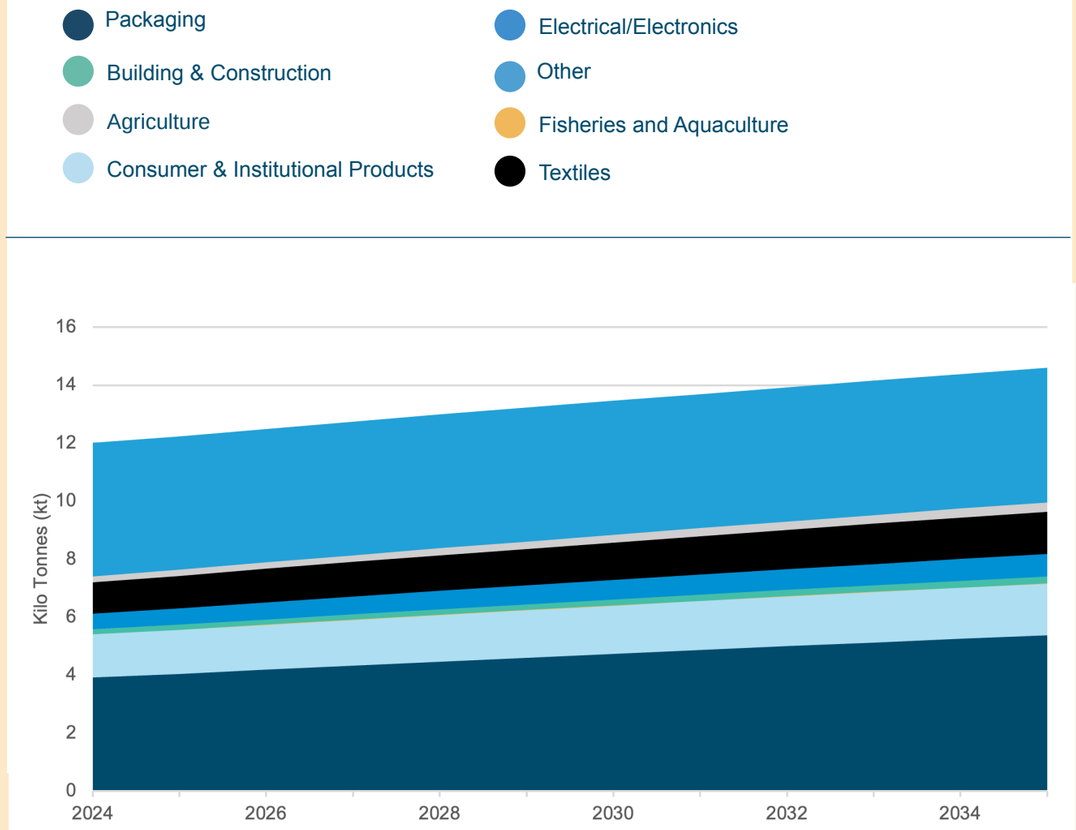


FIGURE 4 2: GROWTH IN ESTIMATED PLASTIC WASTE GENERATION 2024-2035 BAU

4.2 Plastic flows

Summary

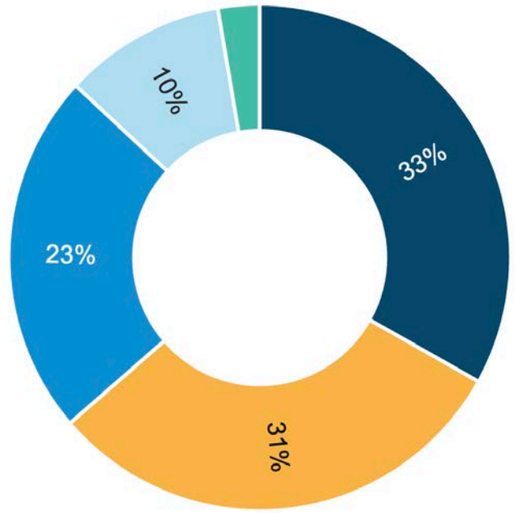
This section describes the pathways that plastic waste follows in Saint Lucia, as modelled by the Plastics Drawdown tool.
The three principal pathways described are:

1. the waste management system (‘managed waste’);
2. directly into the environment (‘mismanaged waste’); or
3. through surface water, building waste pipes and wastewater systems.

The key findings are:

- 11,500 tonnes (96%)of plastic waste in Saint Lucia were collected and entered the waste management system in 2024. Some of these materials subsequently leaked into the environment and become plastic pollution.
- An estimated 480 tonnes of plastic waste were mismanaged (i.e. littered, dumped or burnt) in 2024.
- In addition, an estimated 7 tonnes of plastic fishing gear are thought to have been lost or discarded directly into the marine environment around Saint Lucia.
- An estimated 73 tonnes of plastic waste entered the surface water drain system, which then flowed directly into waterways or the sewerage system.

Figure 4.3 summarizes the proportion of plastic waste that flows through different pathways and into the environment.



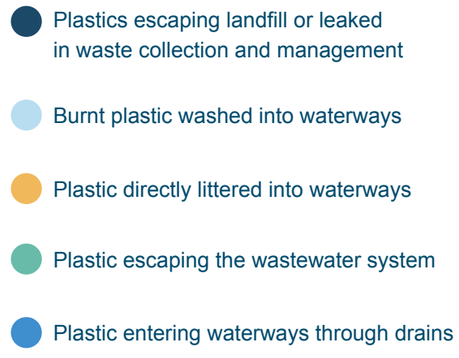


FIGURE 4 3: SUMMARY OF MARINE PLASTIC WASTE LEAKAGE PATHWAYS (TONNES, 2024)[5]

[5]Due to summarising and rounding, the figures in this chart may differ slightly from numbers referred to throughout this report.

Managed waste

The Sankey diagram in Figure 4.4 illustrates the main flows of managed waste.

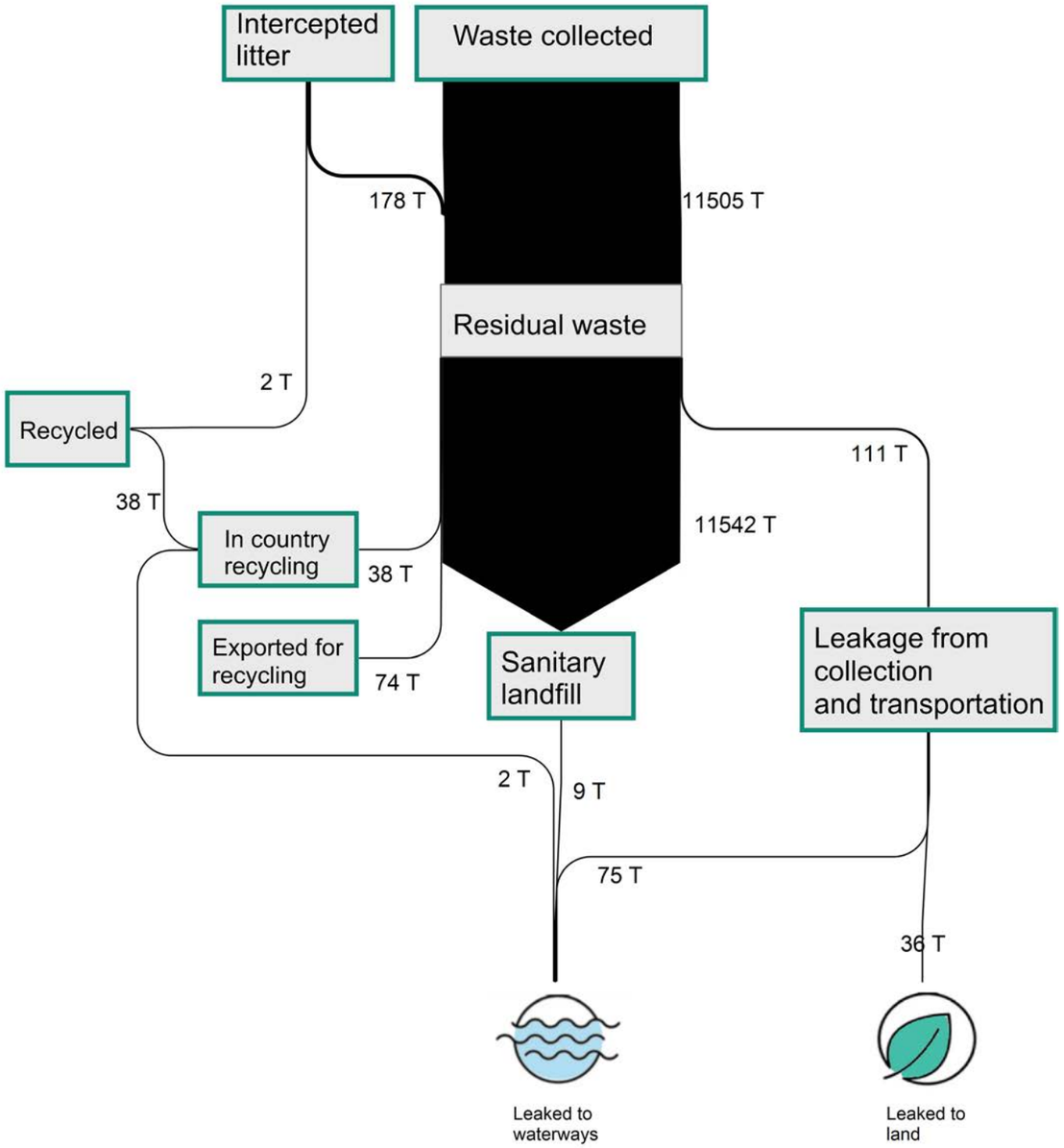


FIGURE 4 4: FLOWS OF MANAGED WASTE (TONNES, 2024)

The Saint Lucia Solid Waste Management Authority (SLSWMA) is responsible for the collection, transportation and disposal of all municipal solid waste, which is contracted out to 16 private waste collection companies. Households and commercial entities do not pay a waste collection fee. Instead, this collection is funded through an environmental levy on airport and seaport visitors and a central government subvention.

Conversely, hotels and marinas pay for the collection of their waste, which is collected and transported by private licensed waste collectors that they contract. The SLSWMA is also responsible for the operation of the one sanitary landfill at Deglos in the north of the island, and a waste transfer facility in Vieux Fort in the south.

Street sweeping in Saint Lucia is the responsibility of the local constituency councils. SLSWMA provides a twice-weekly island-wide municipal waste collection service, and a four-days-per-week collection service in Castries' Central Business District, which it contracts out to licensed waste haulers.

Inaccessible households are provided with a communal bin in which to dispose of their waste. There are well-documented issues associated with the provision of communal bins, such as overflowing and misuse, which a micro-haulers project (2021, as part of the ReMLit programme) sought to address.

Based on a review of the available information and discussions with key stakeholders, it is estimated that around 11,500 tonnes of plastic waste were collected by the waste management system in 2024, representing 96% of the total plastic waste generated. In addition, an estimated 180 tonnes of litter were intercepted through regular street cleaning and gutter cleaning activities and re-entered the waste management system.

With the exception of a small quantity of waste plastic that is collected for recycling, the majority of the collected waste is transferred to the Deglos landfill site. Landfill capacity at Deglos Sanitary Landfill is under significant pressure. The landfill, which opened in March 2003, was originally designed with a lifespan of 25 years, projecting a 2028 closure (IDB, 2016). However, the SLSWMA estimates that the landfill has 6-8 years of capacity remaining, meaning it may still be operational until 2031 or 2033.

Under the BaU scenario, the amount of plastic waste that will require landfilling will increase from 11,540 in 2024 to over 14,040 tonnes in 2035. Cumulatively, this will mean an additional 153,700 tonnes of plastic is landfilled. This will necessitate a strong focus on waste diversion and circular economy initiatives and will place increasing importance on the SLSWMA's plans for a new landfill in the south of the island.

There is currently no widespread, systematic waste segregation or recycling collection for plastic in Saint Lucia. To date, recycling has been limited to small-scale projects such as a recent pilot plastic recycling project initiative targeting PET and HDPE bottles run by RePLAST-OECS. The project encouraged residents to return bottles to collection points in return for reward points.

In addition, recycling is undertaken on a small scale by a few private operators. These include Plastic Solutions, which recycles HDPE and LDPE into plastic bags that are sold locally, and Recyclene, which processes and exports PET and HDPE, primarily sourced from Heineken Saint Lucia Ltd.

With regards to reprocessing, a PET reprocessing facility, SIDREP, in neighbouring Martinique, has closed down, reducing the opportunity for the export of such material. A new facility in Saint Lucia, which was part of the Plastic Waste-Free Islands (PWFI) project, takes high-density polyethylene (HDPE) and polypropylene (PP) plastic waste to make furniture for the local market. However, the facility is upgrading its power supply and – at the time of writing – is not currently operating.

Managed waste

As shown in Figure 4.5, an estimated 502 tonnes of plastic waste were mismanaged (i.e. littered, dumped or burnt) in 2024. We estimate that around half of this directly pollutes the terrestrial environment or ends up in waterways.

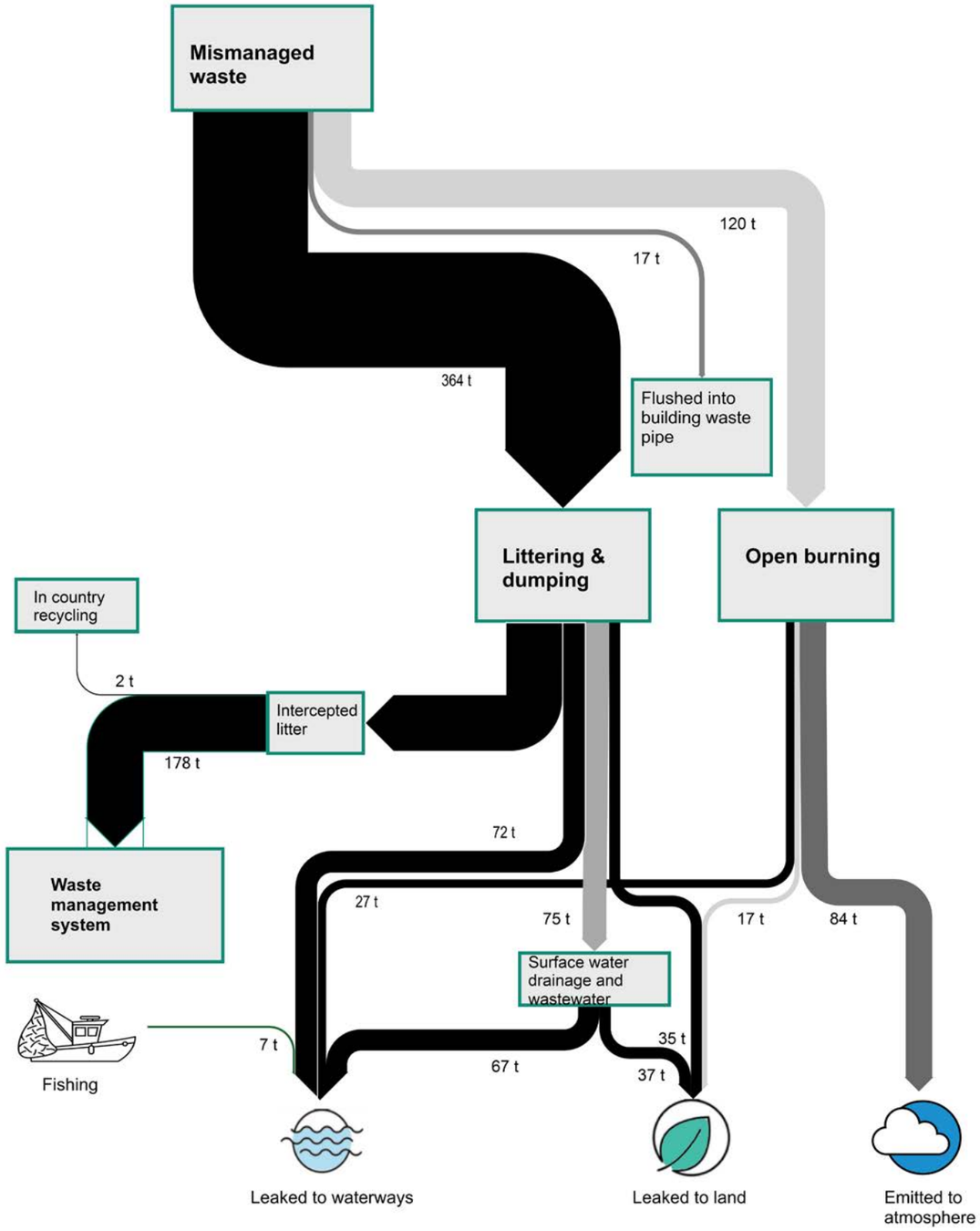


FIGURE 4 5: FLOWS OF MISMANAGED WASTE (TONNES, 2024)

Litter collections and fly-tipping clean-ups are believed to capture around half of all littered waste. Of the remainder, an estimated 20% of littered items enter surface water drains, 10% stay on land and 20% is littered directly into the watercourse. In addition to this, we estimate that around seven tonnes of plastic fishing gear enter the ocean each year.

Littering is widely recognised as a significant challenge, particularly in urban areas. Littering of on-the-go-items (plastic bags, beverage bottles and caps, straws and stirrers, food wrappers, single-serve food sachets, takeaway containers, cups, plates and cutlery) is common, and constitutes a large proportion of the plastic waste that is released into the environment.

Saint Lucia's urban areas benefit from regular street cleaning, which helps to intercept some of this litter before it enters drains. Streets are cleaned weekly, but primarily in urban areas, with an estimated 180 tonnes of material being intercepted and subsequently managed by the waste management system.

Fly-tipping – the illegal dumping of larger quantities of waste in public spaces – presents an additional challenge. Saint Lucia's mountainous terrains make the clean-up of this waste more difficult. Some residents may miss or disregard the waste collection schedule and dump waste on non-collection days. A general lack of public awareness regarding the environmental consequences of these actions, coupled with insufficient or ineffective penalties, may contribute to this issue.

Around half of the litter is intercepted through activities like street sweeping and drain cleaning and is diverted into the formal waste management system, while 10% remains on land and 20% is directly littered into the watercourse. The rest washes into surface water drains (see Section 4.2.4). Blockages from litter can cause issues with flooding in low-lying areas as well as affecting the marine environment.

It is illegal to open burn waste in Saint Lucia. However, it still occurs at low levels, with approximately 120 tonnes (1%) of plastic waste being disposed of through this method. This results in an estimated 24 tonnes of burnt plastic polluting waterways and 12 tonnes remaining on land.

Surface water drainage and wastewater flows

The flow of plastic waste through domestic wastewater, sewage and surface water drainage systems accounts for more than a quarter of the total leakage of plastic waste into Saint Lucia's waterways.

Surface water drainage flows

In Saint Lucia, drains, channels and pipes that enter surface water courses manage surface water - such as rainwater run-off from roads, sidewalks, and other surfaces. This system of surface water management is not connected to Saint Lucia's wastewater treatment system (see below). As a result, any littered items or microplastics that enter surface water drainage systems, which are not removed by drain cleaning, either settle in the drainage system itself, or enter surface water courses and the sea.

Drain cleaning occurs five times per week in the capital, Castries, but less frequently in rural areas. Accordingly, an estimated six tonnes of plastic waste are removed from the surface drainage system through drain cleaning and enter the waste management system. The remaining 65 tonnes either settle in the surface water drain (5 tonnes), or leak into the sea (60 tonnes), as shown in Figure 4.6.

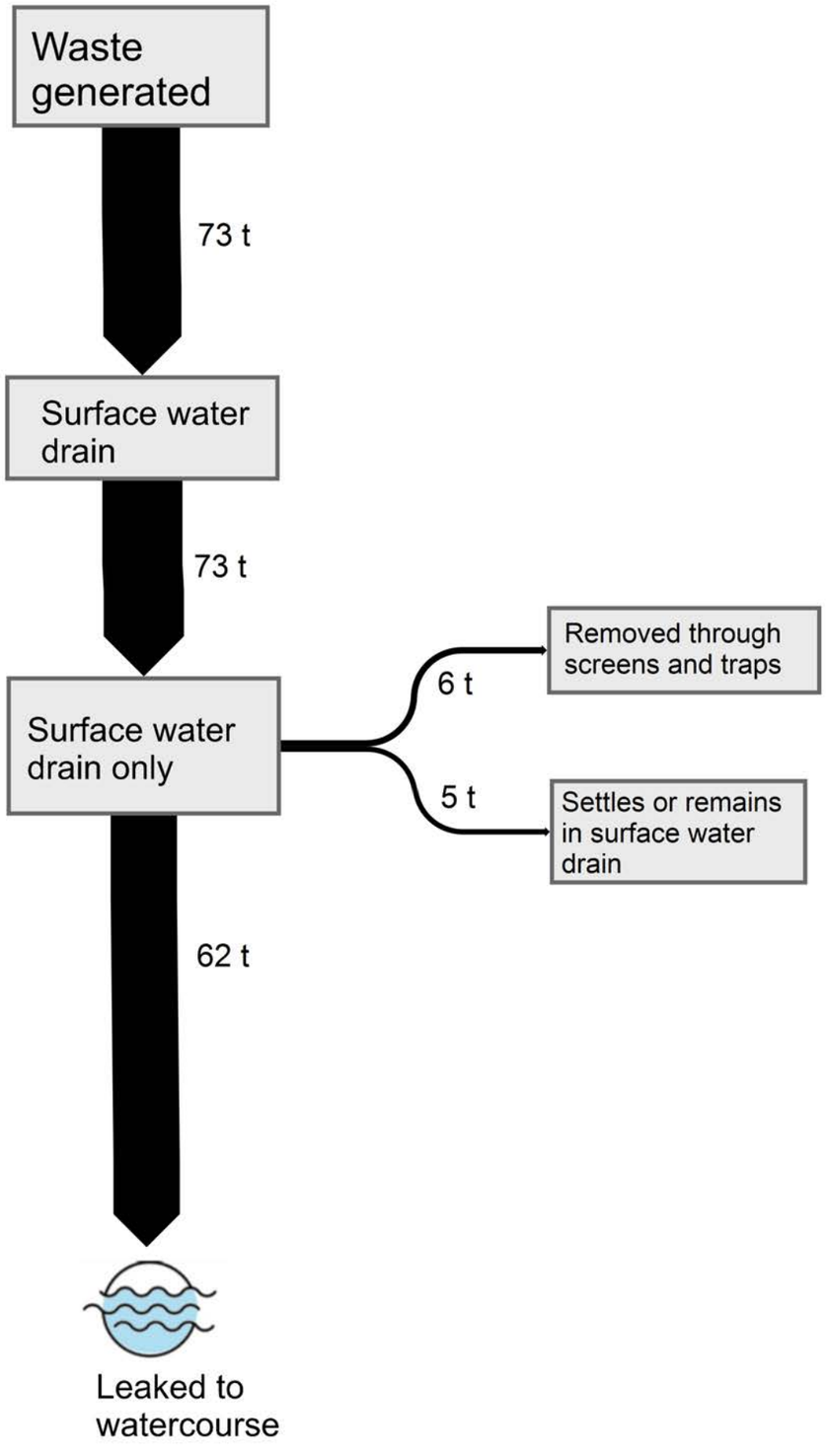


FIGURE 4 6: SURFACE WATER DRAIN FLOWS (TONNES)[6]

[6]Please note that the end nodes of this diagram do not sum to the origin node "Litter enters surface water drain" due to rounding.

Wastewater flows

Most properties in Saint Lucia are not connected to a municipal sewerage system. The sewerage systems in Saint Lucia only serve around 7% of the population. These properties are connected to one of four sewerage systems on the island (Caribbean Water and Wastewater Association, n.d.):

1. a wastewater system in Castries, which discharges raw sewage into the sea via a near shore outfall, serving 15% of Greater Castries,
2. the Beausejour sewerage treatment system, located at Rodney Bay, which serves residential and hotel properties in the north of the island, and
3. two small, package treatment plants located at Emerald Development and Black Bay, which discharge treated effluent into the environment.

The Water and Sewerage Company Inc. (WASCO) is responsible for the provision of water and wastewater services in Saint Lucia. The main Wastewater Treatment Plant on the island, located in Beausejour, comprises an effective pumping screening system ahead of discharge arriving at this wastewater treatment facility. Any screened material is sent to the Deglos landfill for disposal.

The Central Statistical Office of Saint Lucia (2022) estimated that 79% of households use septic tanks but stakeholder feedback suggested this has increased further to 85% and those using pit latrines have decreased (to 8%).

Whilst several years old now, Figure 4.7 usefully indicates that in 2016 about 2% of domestic blackwater and sludge was properly treated. Stakeholder feedback suggests this is closer to 3.5% and confirmed that the flows outlined still generally reflect the current system. Stakeholder discussions suggest that householders with septic tank systems are unlikely to dispose of plastic items down the toilet, where the cost of any maintenance and repair would be covered by the residents.

However, residents on a sewered system frequently flush items such as wet wipes. Due to the reliance on septic systems, the quantity of these materials entering the wastewater system is estimated to be quite low, although it may be higher in tourist areas. However, information is limited on this issue so it should be considered as a potential route, at least for some flushable items, as well as microplastics from the washing of clothes.

4.8 illustrates the building waste pipe flows in the Sankey form.

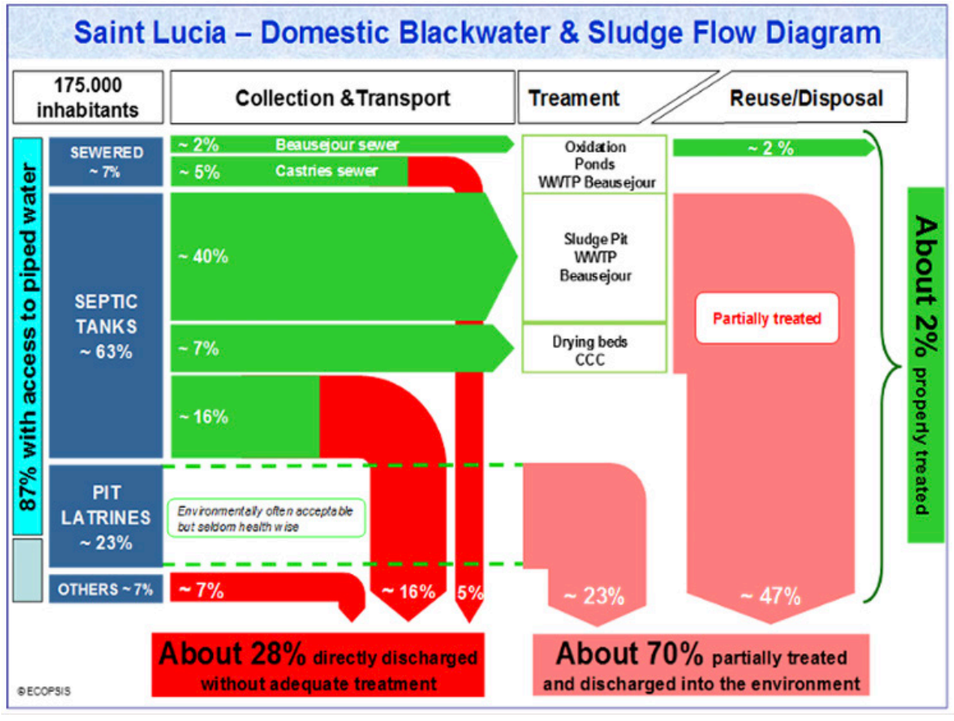


FIGURE 4 7: WASTEWATER FLOWS (TAKEN FROM MINISTRY OF SUSTAINABLE DEVELOPMENT, ENERGY, SCIENCE AND TECHNOLOGY, 2016)

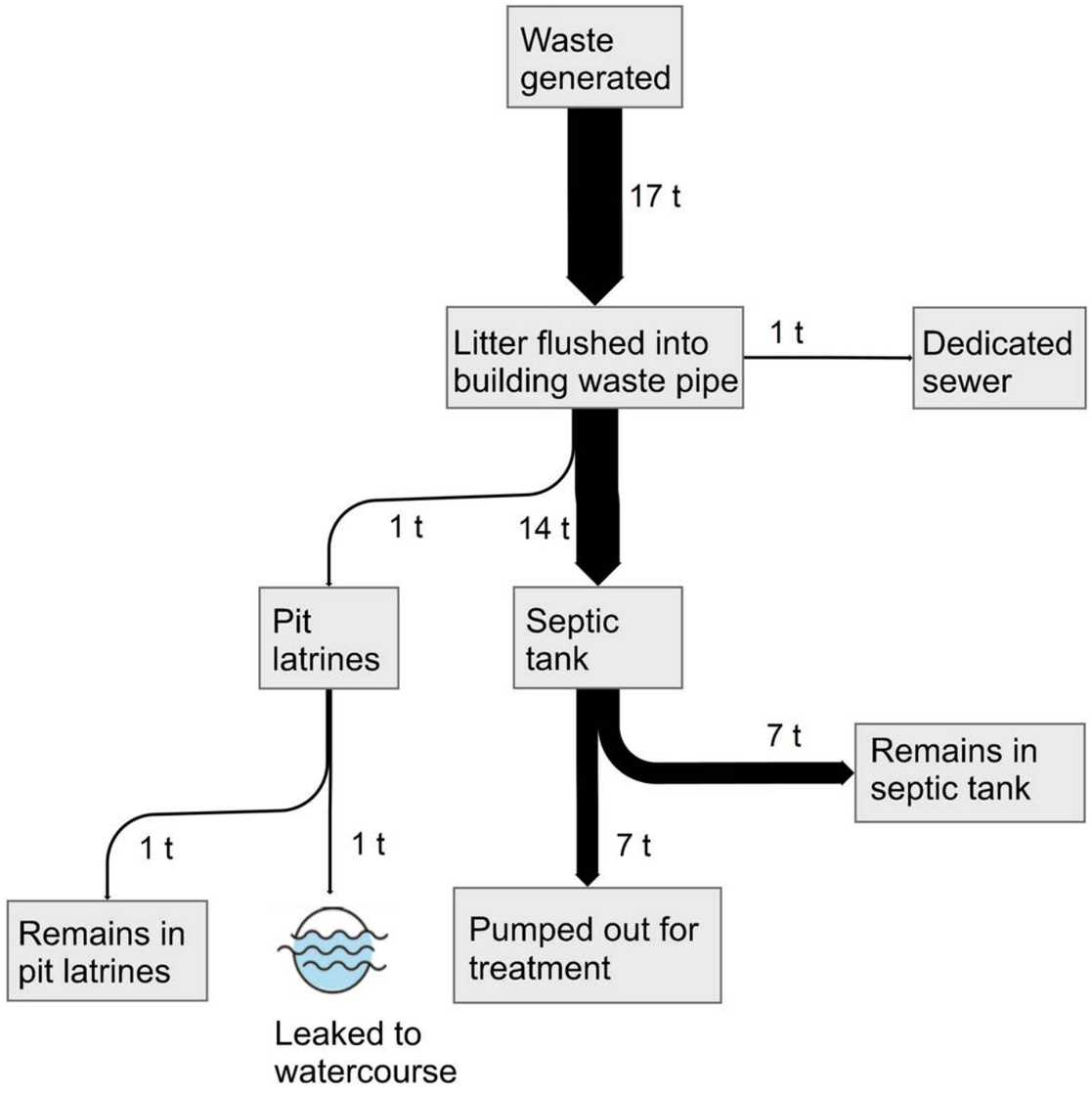


FIGURE 4 8: BUILDING WASTE PIPE FLOWS (TONNES)

Microplastic flows

Figure 4.9 illustrates the estimated microplastic flows in Saint Lucia. The majority of microplastic emissions in Saint Lucia are thought to come from vehicle tyre and brake wear. Due to their light weight, these microplastics particles are often carried directly into waterways or the drainage system. Microbeads from cosmetics and fibres shed from clothing during washing enter building waste pipes which flow directly into waterways. Pre-production pellets are typically lost during handling and transportation and leak into watercourses directly.

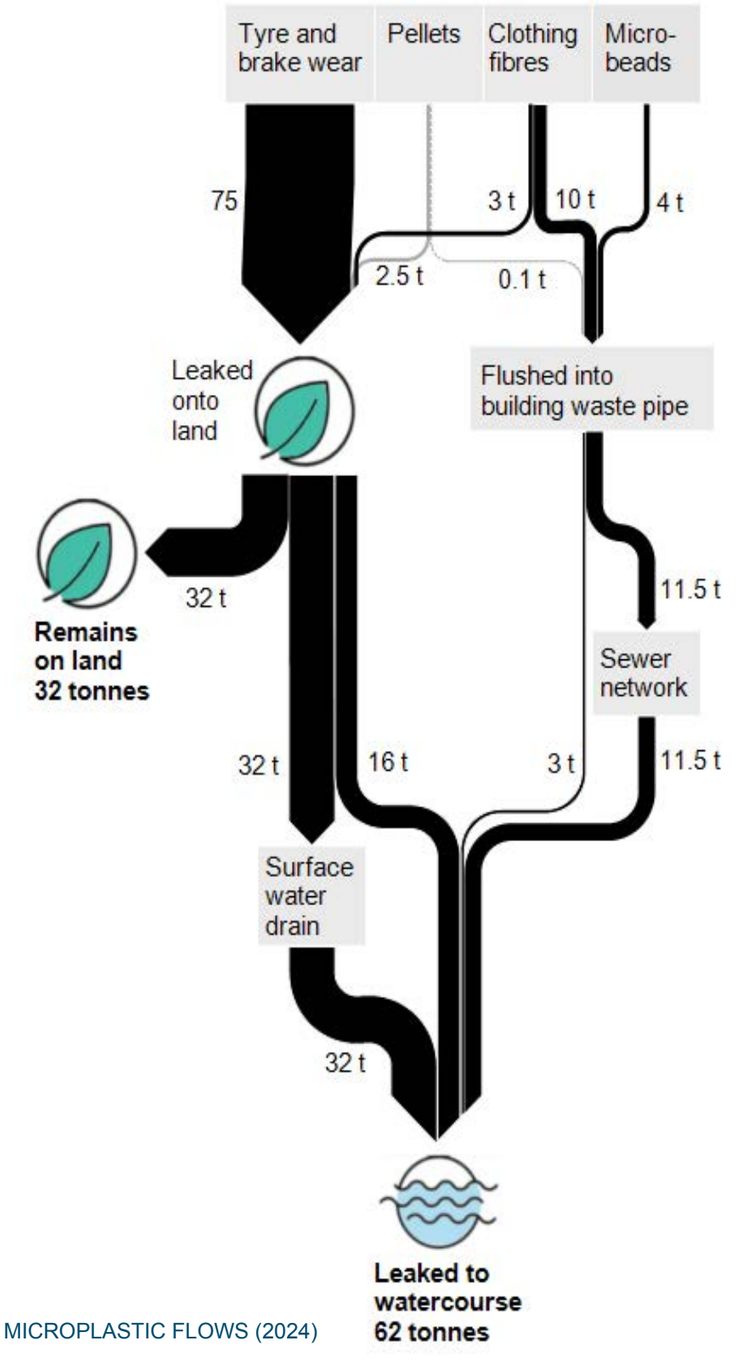


FIGURE 4 9: MICROPLASTIC FLOWS (2024)

4.3 Plastic pollution

Summary

This section discusses the estimated quantities and types of plastic waste that escape into the environment in Saint Lucia. The key findings are:

- 347 tonnes of macroplastic waste escaped into the environment in Saint Lucia in 2024.
- Of this, 258 tonnes of macroplastic pollution entered the ocean. Equivalent to approximately 150 shipping containers full of plastic waste.[7]
- The remaining 89 tonnes were littered on land.
- Without action, ocean plastic pollution will increase by 21.8% to 314 tonnes in 2035.
- Around 95 tonnes of microplastics were emitted and released into the environment, of which 61 tonnes were leaked into the watercourse and 34 tonnes remained in the terrestrial environment.
- The most common individual components of plastic waste leakage in Saint Lucia in 2024 were:
    - Beverage and other plastic bottles (28.2 and 16.1 tonnes, respectively)
    - Diapers (10.5 tonnes)
    - Wet wipes (8.2 tonnes)
    - Plastic bags (6.1 tonnes)
    - Microplastics (34 tonnes), comprising mainly tyre wear.
- If no further action is taken, then a total of 4,630 tonnes of plastic waste is expected to be released into Saint Lucia's environment between 2024 and 2035.

Leakage from the managed waste system

The waste management system leaks an estimated 86 tonnes of plastic waste into the watercourse. This is primarily a result of waste escaping during collection, transportation, processing and disposal.

Transportation accounts for the largest share of this leakage (75 tonnes). Stakeholder feedback indicates that waste often falls from waste collection vehicles during transportation to landfill sites. The frequent breakdowns of these vehicles disrupt timely waste collection, which sometimes results in overflowing communal and household bins. Furthermore, some replacement vehicles used are open-backed trucks without proper waste coverings, which exacerbates waste leakage.

A further nine tonnes of waste are estimated to leak from the Deglos landfill. This is, in part, a result of only a small part of the landfill's perimeter being fenced in. Additionally, while waste is supposed to be covered daily, recent heavy rains and equipment breakdowns have resulted in the waste not being covered for some months. This further exposes it to the wind and rain, increasing leakage. This leakage pathway also incorporates an estimate for waste leaked through processing at private recycling facilities.

[7]This estimate is based on uncompacted waste densities and the volume of a standard forty-foot shipping container (67 m3)

Leakage from mismanaged waste

An estimated 72 tonnes of plastic waste are littered directly into the watercourse. This includes all waste that is directly or indirectly littered, or illegally dumped on land, which is subsequently transported into the sea through flooding, heavy rainfall, or being blown into the watercourse by the wind. This pathway also encompasses plastic pollution arising from the high rates of littering of on-the-go items, notably bottles and plastic bags, especially on beaches or in coastal and river areas.

Although regular street cleaning in Saint Lucia's urban areas helps to intercept litter before it enters drains, stakeholder feedback indicated that littering remains a significant challenge. The problem is particularly acute during periods of major rainfall.

Littering may have worsened because of the misconception that alternatives to single-use plastics biodegrade quickly and can therefore be disposed of directly into the environment.

While open burning has been a traditional method of disposing of waste, it is illegal in Saint Lucia and no longer a common practice. Despite its prohibition, reports indicate that open burning still occurs, albeit at low levels. An estimated 120 tonnes or 1% of plastic waste generated is disposed of via open burning. The majority of this is combusted but, of the residues and un-combusted fraction, 27 tonnes are washed into the ocean and a further 17 tonnes remain on land.

Leakage from surface water drainage and wastewater systems

Around 60 tonnes of plastic waste polluted local waterways in 2024 through the surface water drainage system. Plastic waste entering the ocean through this leakage pathway includes littered plastics washed into drainage systems. These are often dumped directly into the ocean, with limited waste screening taking place in surface water drains.

In 2024 an estimated seven tonnes of plastic pollution entered the marine environment through this pathway due to plastics in wastewater being discharged into the ocean. Of this total, one tonne stems from pit latrines, while the remaining six tonnes result from the sewer system discharging untreated wastewater directly to the sea, affecting approximately half of the waste entering it.

Types of plastic waste leakage

A total of 2,588 tonnes of macroplastic waste, and 61 tonnes of microplastics, are estimated to have escaped into the marine environment in Saint Lucia in 2024.

The Plastic Drawdown model estimates that 89 tonnes are leaked into the terrestrial environment. This total comprises a wide variety of material types and items.

The most common individual types of plastic identified as leaking into the ocean are shown in Table 4.3.

Packaging items are the most likely items to leak in the marine environment via littering and dumping, accounting for 79.8 tonnes of leakage in 2024. Beverage bottles, as noted by several stakeholders, are a major source of aquatic pollution in Saint Lucia and the second largest identifiable macroplastic item polluting the aquatic environment (28 tonnes). They are followed by other plastic bottles (16.1 tonnes), plastic bags (6.1 tonnes) and food wrappers (4.8 tonnes).

Sanitary products constitute a large component of leakage, through littering but also via wastewater systems. This category includes diapers (10.5 tonnes) along with wet wipes (8.2 tonnes) and sanitary pads (2.7 tonnes). Discussions with key stakeholders indicate that these items cause significant problems in the wastewater system, blocking screens and pipes.

Microplastics are a key type of pollution, predominantly composed of tyre and brake wear particles that are emitted directly into the environment and via the wastewater system. Stakeholder feedback has noted that microplastics are not currently monitored or tested for in the wastewater in Saint Lucia. The science surrounding the leakage of microplastics and the measures that could potentially curtail their release is still in its early stages. However, it is important to recognise that they form a key component of plastic pollution in Saint Lucia and that it is an issue that will warrant careful consideration in the long term.

TABLE 4.3: TOP 12 ITEMS AND ITEM CATEGORY TOTALS ENTERING THE OCEAN IN 2024*

Category	Item	Weight (tonnes)
Packaging	**Total Packaging**	**79.8**
	Beverage bottles	28.0
	Other plastic bottles (oil, bleach, etc.)	16.1
	Food wrappers (candy, chips, etc.)	4.8
	Plastic bags	6.1
	Single-serve sachets (food)	2.8
	Bottle caps (plastic)	2.7
	Single-serve sachets (non-food)	2.2
	Cups, plates (plastic)	2.1
	Lids (plastic)	1.6
Microplastics	Microplastics Total	61.0
	Brake wear	30.8
Fisheries and Aquaculture	Fishing gear	6.8
Sanitary products	Sanitary products total	23.0
	Diapers	10.5
	Sanitary pads	2.7
	Wet wipes	8.2

*ITEM CATEGORIES DO NOT SUM TO THE CATEGORY TOTALS DUE TO ADDITIONAL ITEMS CONTRIBUTING TO OCEAN LEAKAGE. SANITARY PRODUCTS ARE ISOLATED FROM THE 'CONSUMER AND INSTITUTIONAL PRODUCTS' CATEGORY AS A RESULT OF ITEMS BEING FLUSHED INTO THE BUILDING WASTE PIPES FOR PROPERTIES CONNECTED TO THE SEWAGE SYSTEM. THE QUANTITIES OF INDIVIDUAL ITEMS LEAKED ARE ESTIMATES BASED ON OUR PLASTIC DRAWDOWN MODELLING. THIS APPROACH ESTIMATES NATIONAL PLASTIC WASTE FLOWS USING THE BEST AVAILABLE DATA. IN THIS CASE, QUANTITIES HAVE BEEN BASED ON IMPORTS AND CONSUMPTION TRENDS IN SAINT LUCIA AND COMPARABLE JURISDICTIONS.

Projection of plastic waste leakage

In the absence of further policy interventions, it is estimated that a cumulative total of around 4,633 tonnes of plastic waste will enter Saint Lucia's environment over the 11-year period between 2024 and 2035 (see Figure 4.10). This increase is primarily due to the increase in plastic consumption per capita. Market research (via Fact.MR, 2024) showed a projected growth of relevant product and packaging markets over the modelled timeframe.

The increase in plastic waste generation over time, coupled with a lack of clear, effective and robust policy or control mechanisms under the Business as Usual (BAU) scenario, leads to a significantly increased amount of plastic waste entering the sea by 2035. This is shown in Figure . This demonstrates the urgent need to improve and adopt additional policy measures to curtail plastic pollution.

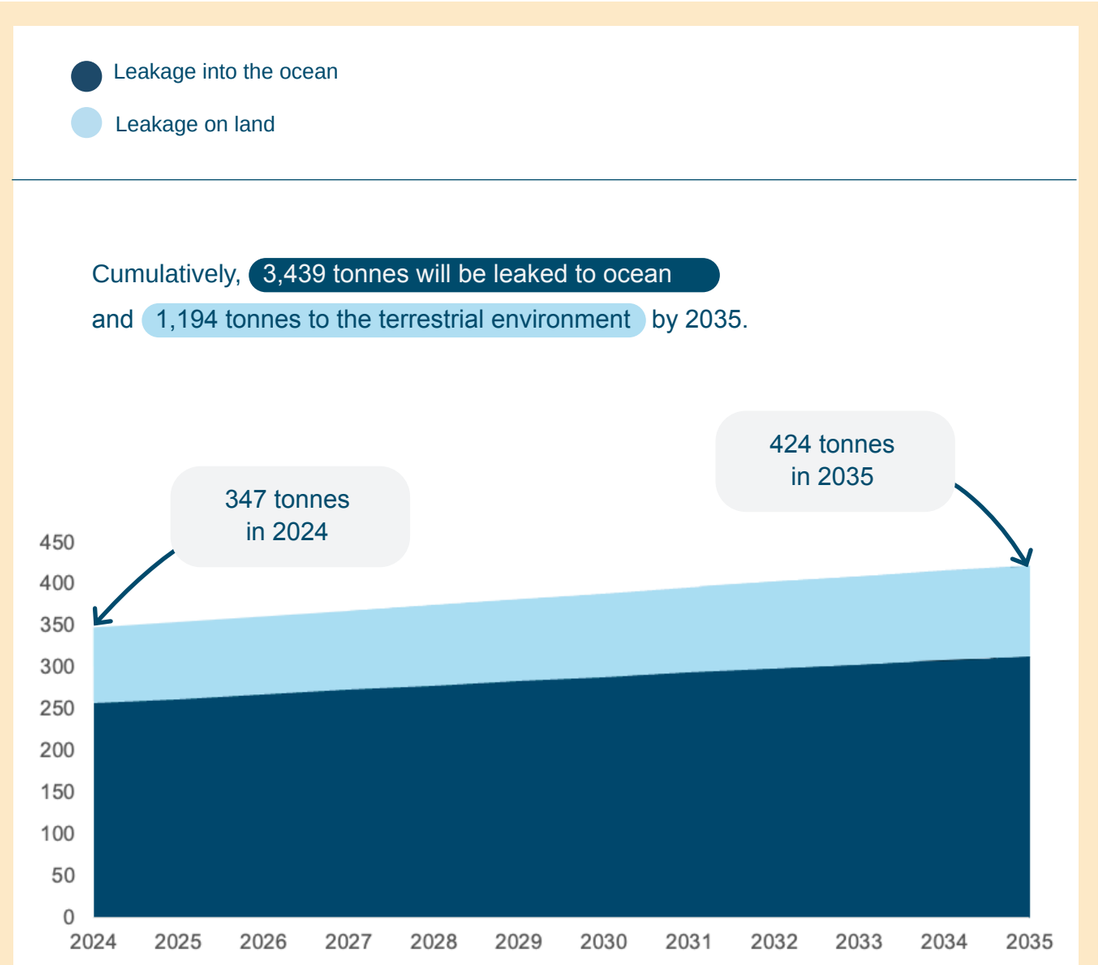


FIGURE 4 10 MACROPLASTIC POLLUTION (TONNES, 2024-2035)

5 Policy analysis

5.1 Summary

Overview

- Section 5 presents an overview, discussion of impact, and recommendations for implementation of a selection of key plastic-related policies in Saint Lucia, namely:

  o The Styrofoam and Plastic Food Service Containers (Prohibition) Act, 2019; and

  o Seven activities in the Marine Litter Management Action Plan (ML-MAP), namely:

    - Implementing and enacting the Management of Beverage Containers Bill
    - Developing a programme for waste segregation in one of the 11 waste collection zones.
    - Developing and implementing a national recycling programme.
    - Developing guidelines and standards for waste minimisation and segregation at hotels, commercial, manufacturing, and institutional establishments.
    - Developing and implementing a programme to promote the recovery, recycling, and reuse of plastics in specific waste streams.
    - Developing and implementing a waste management plan for the fisheries sector to include the return of damaged gear.

  o Cumulatively, these seven activities could reduce marine plastic pollution in Saint Lucia by 87 tonnes per year by 2035 (a 28% reduction) and reduce the amount of plastic landfilled by 4144 tonnes per year by 2035 (30% reduction).

  o Of these policies, the Management of Beverage Containers Bill, along with the recycling and reuse schemes, received the most votes at the February 2025 workshop as participants' top policy priorities for Saint Lucia. These three policies also have the highest marine plastic pollution reduction potential, of 32 tonnes, 38 tonnes and eight tonnes per year by 2035, respectively.

- This is followed by a review of two other pieces of legislation – the Marine Pollution Management Bill and the Draft Plastic Pollution Control Bill.

- A discussion of three additional policies that could help Saint Lucia to further reduce plastic pollution is then provided.

  These are:

  o introducing a plastic bag levy,
  o a reusable diaper campaign and
  o household waste minimisation plans.

- Together, these three additional policies could further reduce marine plastic pollution in Saint Lucia by 33 tonnes (10% reduction) per year by 2035 and reduce the amount of plastic waste that is landfilled by a further 828 tonnes per year by 2035 (6% reduction).

- The report ends with a discussion of cross-cutting activities – monitoring and evaluation, education and financing – that will be important for implementing the ML-MAP activities.

Recommendations:

<u>Styrofoam and Plastic Food Service Containers (Prohibition) Act, 2019</u>

Overview:
The Act has reduced Styrofoam use but led to a switch to polypropylene (PP), which remains problematic. Alternatives exist but are costly or impractical. Public confusion surrounds the disposal of biodegradable items. Import data is insufficient to measure impact.

Recommendations:

- Conduct a market analysis of affordable alternatives
- Introduce a short-term levy on PP products and incorporate PP into the existing ban as a long-term measure
- Expand enforcement authority and allow direct prosecution
- Close legal loopholes allowing single-use items to be labelled as 'reusable'
- Raise public awareness
- Establish standards, and a separate collection and composting system for biodegradable alternatives
- Improve data collection via customs classification reforms

<u>Management of Beverage Containers Bill</u>

Overview:
GOSL plans a deposit return scheme (DRS) for beverage containers <5L, offering 15-cent refunds via redemption depots. The bill is pending Cabinet approval but has high potential for reducing plastic pollution (32 tonnes/year reduction by 2035) and the amount of plastic landfilled (2,427 tonnes/year by 2035). Implementation will depend on strong coordination and financial planning.

Recommendations:

- Conduct stakeholder mapping to bolster support
- Set up a national waste management forum to reduce silos in the plastics value chain
- Provide SLSWMA with training and technical support to manage the MBC Fund
- Plan for legacy waste through pre-funding or lump-sum grants
- Develop a robust monitoring and evaluation framework

Waste Segregation and Recycling Activities

Overview:
Current recycling is minimal, and there is limited infrastructure. Household source segregation is unlikely to be feasible in the short to medium term. A phased return to the redemption depot approach is proposed, starting with a pilot in two urban areas (Castries & Vieux Fort). Lessons from this pilot will inform a national roll-out. These recycling initiatives could reduce marine plastic by 38 tonnes per year by 2035 and reduce the amount of plastic waste landfilled by 1,083 tonnes per year by 2035.

Recommendations:

- Identify markets for recycled goods
- Launch pilots in Castries and Vieux Fort, starting with HDPE items in year one, and expanding to other specific rigid and flexible plastics in year two
- Use incentives (retail points, refunds) to drive initial participation
- Use the Recycle OECS model to introduce source segregation in hotels
- Use the lessons learned from the pilots to launch a full-scale national recycling programme, starting with HDPE items in year one, and expanding to other specific rigid and flexible plastics in year two and beyond.

Waste Minimisation Guidelines

Overview:
Best practice guidelines for waste minimisation exist for hotels but not across other sectors. Where available, guidelines should build upon existing materials. These could reduce plastic pollution by six tonnes per year by 2035 and reduce the amount of plastic waste landfilled by 184 tonnes per year by 2035.

Recommendations:

- Review current documents and practices
- Draft tailored guidelines for each sector
- Make waste plans mandatory in development applications
- Provide training and consider incentives
- Establish monitoring systems

Reuse Schemes

Overview:
Saint Lucia has some existing reuse practices (e.g. reusable grocery bags at Massy, CHEMICO cleaning product bottle return scheme at Massy Cul-De-Sac). Wider reuse of beverage/non-beverage bottles, cups, and takeaway containers could cut eight tonnes/year of marine plastic pollution by 2035 and reduce the amount of plastic waste landfilled by 451 tonnes per year by 2035. Barriers include hygiene laws and limited scale.

Recommendations:

- Review and update regulations blocking reuse
- Create large-scale pilots in urban areas for viability
- Launch education campaigns and use incentives
- Establish reuse infrastructure (e.g. centralized washing)
- Consider grant funding to cover upfront investment costs

Waste Management Plan for the Fisheries Sector

Overview:
Little data exist on lost fishing gear in Saint Lucia, but it poses known environmental risks. Some pilot efforts (e.g. track and trace, clean-ups) have taken place.
A structured waste plan could reduce marine plastic pollution by three tonnes/year by 2035.

Recommendations:

- Conduct stakeholder mapping and consultations to better understand the nature and scale of the problem
- Launch awareness campaigns followed by targeted training
- Create a waste records database to provide better data in the long term on fishing gear use and loss rates.
- Evaluate solutions such as increasing waste disposal points at landing sites, track and trace initiatives, retrieval of lost gear through dive operator partnerships and legislative updates.

5.2 Introduction

This section presents analysis and recommendations for a selection of key policies that have the potential to reduce plastic pollution in Saint Lucia. For each policy, we present an overview of the policy and current context, a discussion of its impact (plastic pollution reduction potential), and recommendations of key actions to support effective implementation.
In summary, this section presents:

- A review of the existing **Styrofoam and Plastic Food Service Containers** (Prohibition) **Act, 2019** (Section 5.2).
- An analysis of seven selected activities from Saint Lucia's Marine Litter Management Action Plan that have been arranged into the following sections:
  - **The Management of Beverage Containers Bill** (see Section 5.4).
  - **Waste segregation and recycling activities** for households and hotels, commercial and institutional establishments, and manufacturing operations, and for the construction sector (see Section 5.5).
  - **Waste minimisation guidelines** for hotels, commercial and institutional establishments, manufacturing operations, and the construction sector (see Section 5.6).
  - **Reuse schemes** focusing initially on consumer packaging (see Section 5.7).
  - **Waste management plan for the Fisheries sector** (see Section 5.8).
- A review of two other policies and instruments - the Marine Pollution Management Bill (see Section 5.9.1) and the Draft Plastic Pollution Control Bill (see Section 5.9.2).
- A discussion of additional policies to propel Saint Lucia towards a circular economy – introducing a plastic bag levy (see Section 5.10.1), a reusable diaper campaign (see Section 5.10.2) and household waste minimisation guidelines (see Section 5.10.3).
- A discussion of cross-cutting activities that will be important for implementing the ML-MAP and other initiatives (see Section 5.11).

The activities selected from the ML-MAP were chosen based on their suitability for quantitative assessment using the Plastic Drawdown tool.

In contrast, other recommended actions within the ML-MAP — such as expanding collaboration with regional and international waste management partners — are equally as important but pose challenges for quantitative evaluation due to their indirect nature, long-term impact trajectories, and less immediately measurable outcomes.

Together, the seven policies analysed from the ML-MAP have the potential to reduce marine plastic pollution in Saint Lucia by 87 tonnes per year by 2035 (Figure 5.1) and reduce the amount of plastic landfilled by 4144 tonnes per year by 2035 (30% reduction).

The three additional policies proposed by Common Seas could further reduce marine plastic pollution in Saint Lucia by an additional 33 tonnes per year by 2035 (Figure 5.2) and reduce the amount of plastic waste that is landfilled by a further 828 tonnes (6% reduction) per year by 2035.

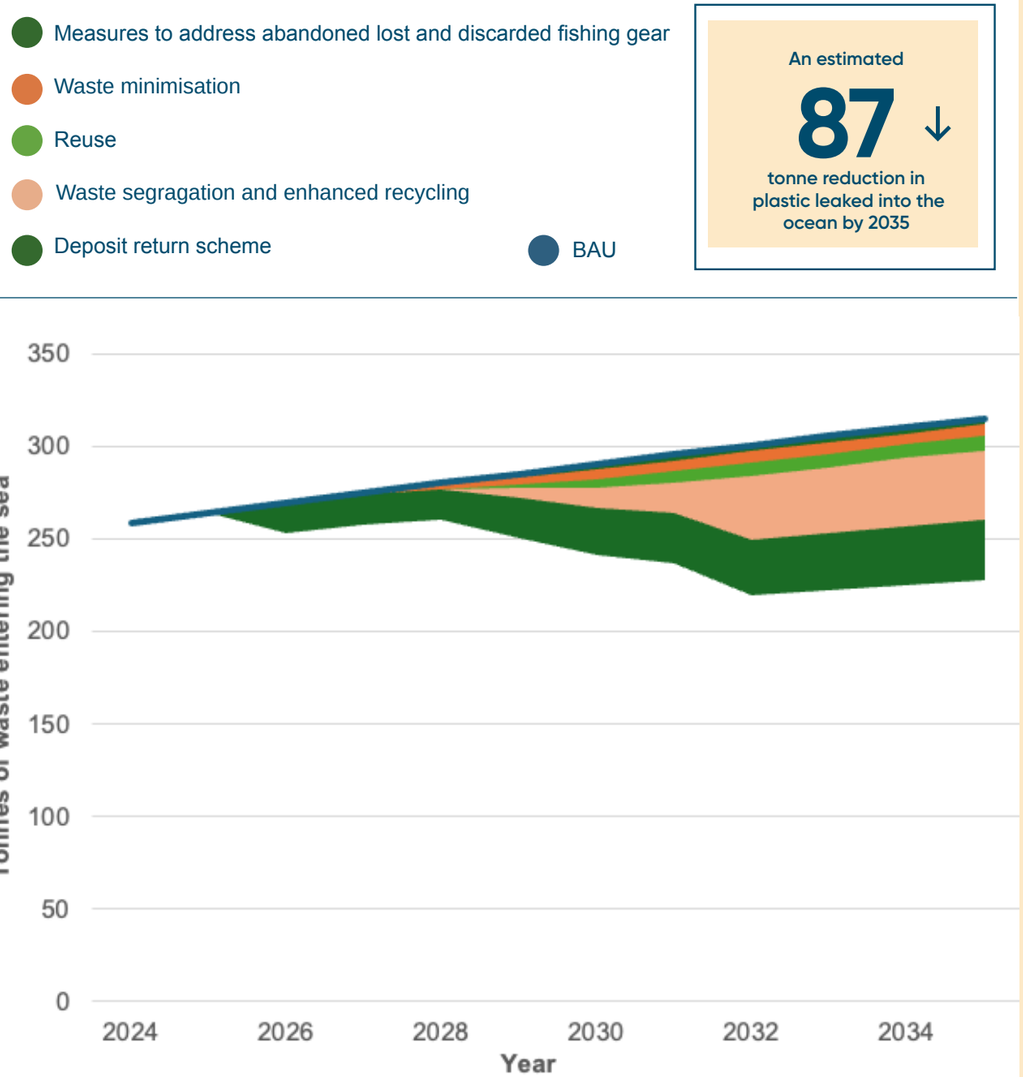


FIGURE 5 1 MARINE PLASTIC POLLUTION REDUCTION POTENTIAL OF THE ML-MAP POLICIES ANALYSED IN THIS REPORT

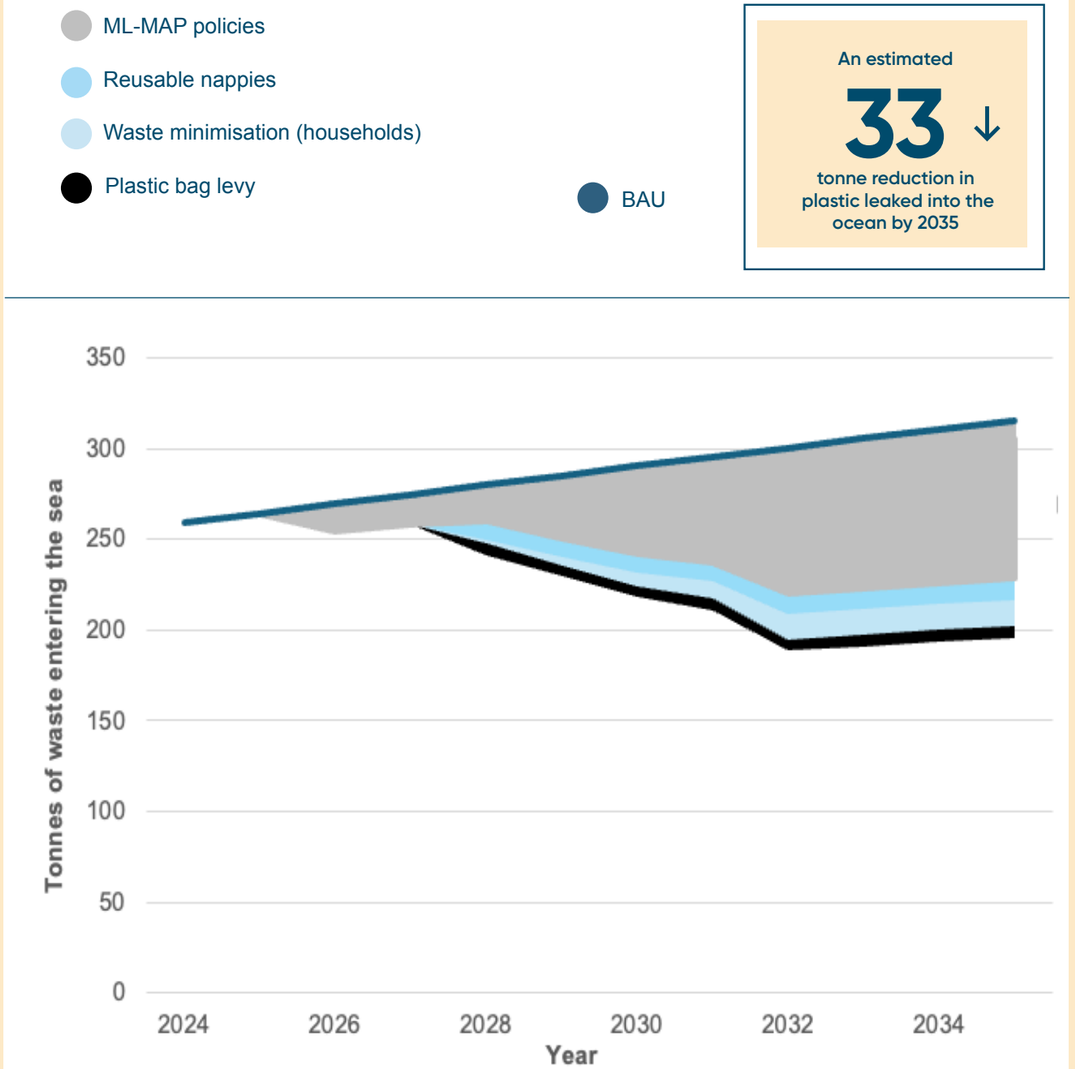


FIGURE 5 2 MARINE PLASTIC POLLUTION REDUCTION POTENTIAL OF THE THREE ADDITIONAL POLICIES FOR CONSIDERATION

5.3 Styrofoam and Plastic Food Service Containers (Prohibition) Act

Summary

Overview:

- The Act prohibits the import, manufacture and sale of specific single-use plastic and Styrofoam products.
- There is confusion over the disposal routes for biodegradable packaging materials that are available on the island.
- Alternative, biodegradable materials are available and used. They are expensive compared to single use items, and some are reportedly unsuitable for food service (e.g. bagasse-based packaging).
- It has had mixed success. Use of Styrofoam containers has decreased but there has been an increase in the use of single-use polypropylene instead.
- Insufficient data are available to assess the impact of the ban.

Recommendations:

- Conduct a market analysis of alternative materials and support the introduction and up-take of alternatives.
- Introduce economic incentives to encourage the use of alternatives (including reusable alternatives).
- Strengthen data collection for effective policy evaluation.

Strengthen enforcement and compliance, including by:

- Establishing and enforcing a standard for alternative materials through the Saint Lucia Bureau of Standards (SLBS).
- Amend the Act to allow the DSD to directly prosecute violators.
- Close regulatory loopholes that currently exempt single-use plastic items labelled as “reusable” from the existing ban.
- Implement regular and ongoing public education and awareness-raising campaigns.

- Manage biodegradable and compostable alternatives by:
  - Establishing clear standards for biodegradable alternatives.
  - Establishing a separate collection and composting system.

5 Policy analysis

Overview

The Styrofoam and Plastic Food Service Containers (Prohibition) Act, 2019 is currently the only plastic-related policy in effect in Saint Lucia. This legislation was introduced as a strategic measure to address plastic pollution. It prohibits the import, manufacture, and sale of specific single-use plastic and Styrofoam products. The ban's implementation followed a phased approach, commencing in August 2019, with all items listed in Table 5.1 being fully banned for import, manufacture and sale by August 2022.

TABLE 5.1: ITEMS BANNED UNDER THE STYROFOAM AND PLASTIC FOOD SERVICE CONTAINERS (PROHIBITION) ACT, 2019

	Styrofoam	PET, HDPE, PS
Plastic items targeted	• Disposable cup • Disposable plate • Disposable tray • Disposable hinged takeaway container • Disposable bowl • Disposable egg carton	• Disposable cup • Disposable plate • Disposable beverage cup lid • Disposable bowl lid • Disposable fork • Disposable spoon • Disposable knife • Disposable straw • Disposable hinged takeaway container • Disposable bowl • Disposable tray • Disposable stirrer

Assessment

The Styrofoam and Plastic Food Service Containers (Prohibition) Act, 2019 has had mixed success in reducing prohibited items in Saint Lucia. While there has been a noticeable decline in the use of expanded polystyrene (EPS) packaging[8], the overall impact of the ban is difficult to quantify due to the limited availability of pre- and post-ban import data. We explore this further in the Strengthening data collection for effective policy evaluation Section, below.

A key unintended consequence of the ban is the switch to polypropylene (PP) plastic packaging, which is not targeted under the legislation as it was not previously widely imported into Saint Lucia.

In addition, there has been an increased reliance on biodegradable plastics, including those made from polylactic acid (PLA)—a bioplastic derived from renewable resources such as corn and sugarcane. Despite their marketed environmental benefits, littering of these items still occurs, as with single-use plastic food takeaway packaging. Misconceptions that they break down naturally and are therefore harmless when disposed of directly into the environment may increase their likelihood of being littered. Indeed, the public's knowledge of bioplastics is generally low; a survey in Australia, for example, found that the majority of respondents were unsure whether biodegradable plastics can have negative environmental impacts (Dilkes-Hoffman et al., 2019).

In reality, most biodegradable materials can only break down under controlled conditions, such as in industrial composting facilities with specific oxygen levels, UV exposure, and temperatures, which Saint Lucia does not currently have. These items often do not degrade effectively in home composting or natural environments (see Figure 5.4, below, for an overview of biobased plastics and the conditions under which they biodegrade).

During the legislation's development, the government procured 20 pyrolysis machines intended to support the disposal of such materials through thermal decomposition. However, these machines were delivered with mechanical faults and have never been operationalized.

Moreover, the introduction of biodegradable plastics presents challenges for plastic recycling efforts, as they contaminate recycling streams due to their different chemical compositions. Unlike conventional plastics, bioplastics such as PLA break down under conditions incompatible with standard recycling processes, and even small amounts of these materials can contaminate entire batches of recycled plastic.

This issue is particularly problematic for Saint Lucia's future plastic recycling initiatives, as PLA closely resembles other fossil-fuel based plastics such as PET, especially in clear or translucent forms, making it difficult to distinguish and separate during sorting processes.

FIGURE 5 3: POLYPROPYLENE CLAMSHELL PACKAGING AT A MASSY SUPERMARKET IN SAINT LUCIA

Bio-based plastics and their biodegradation

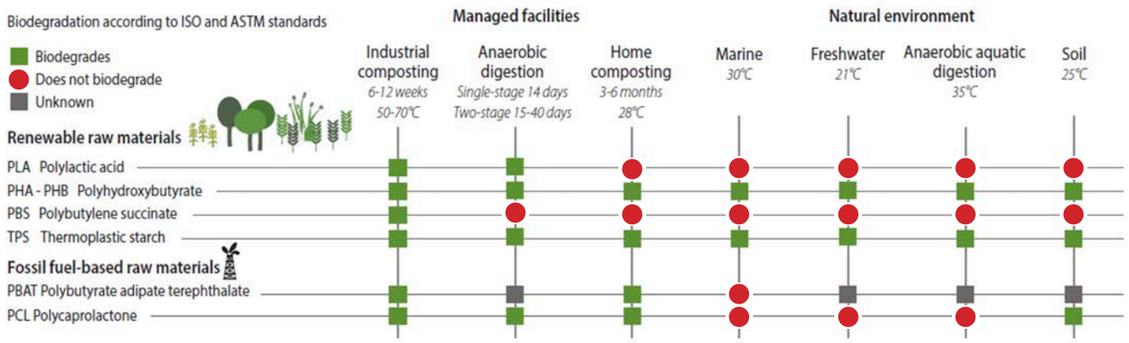


FIGURE 5 4: AN OVERVIEW OF BIOBASED PLASTICS AND THE CONDITIONS UNDER WHICH THEY BIODEGRADE (SOURCE UNEP, 2021)

[8]Assessed through stakeholder consultations and an examination of the packaging products available from several retailers on the island.

Recommendations

Recommendations for this policy fall into four main categories:

Identifying suitable alternatives	Strengthening enforcement and compliance	Managing biodegradable alternatives	Strengthening data collection for effective policy evaluation.
			

Each of these is discussed further on the following pages

Identifying suitable alternatives

The widespread shift to polypropylene (PP) packaging in Saint Lucia has been largely driven by the limited availability of cost-effective alternatives to conventional plastic.

While PLA is marketed as a biodegradable alternative, its significantly higher cost compared to PP makes it a less viable option for businesses. In addition, its use is inadvisable in contexts like Saint Lucia, where separate collection and treatment systems do not exist, due to the challenges with biodegradable plastics, outlined above. Similarly, bagasse-based packaging—derived from sugarcane pulp—is available in Saint Lucia but has been reported to become overly soggy when used for oily or sauce-heavy foods, which are popular on the island.

To ensure that the transition away from plastic single-use food items is both environmentally sustainable and economically feasible, we recommend the following strategic actions:

Identify cost-effective, environmentally friendly alternatives to the banned single-use plastic items by conducting a comprehensive market analysis.

Where possible, priority should be given to exploring reusable options, as further detailed in Section 5.7. This analysis should include a review of materials successfully adopted in other Caribbean nations with single-use plastic bans (e.g. Barbados), as these countries share similar challenges, making their solutions potentially well-suited for Saint Lucia.

Introduce an economic incentive structure to encourage the adoption of sustainable packaging.

In the short term, this could involve implementing a levy on PP packaging to narrow the price gap between PP and more environmentally responsible alternatives. In the long term, once cost-effective substitutes become widely available, PP should be incorporated into the existing ban to ensure a complete phase-out of non-essential single-use plastic packaging.

By adopting this phased approach, Saint Lucia can mitigate the unintended consequences of its plastic regulations, ensuring that future material transitions align with environmental sustainability goals while remaining economically feasible for businesses.

Strengthening enforcement and compliance

Ensuring the effective implementation of the Styrofoam and Plastic Food Service Containers (Prohibition) Act, 2019 remains a challenge, primarily due to gaps in monitoring and enforcement mechanisms. Currently, inspections of establishments are limited to personnel from the Department of Sustainable Development (DSD), restricting the capacity to ensure compliance.

Additionally, the requirement for prosecutions to be processed through the court system has resulted in delays due to legal backlogs, weakening the deterrent effect of enforcement efforts.

To address these challenges and enhance regulatory oversight, we propose the following recommendations:

Establish and enforce a standard for alternative materials through the Saint Lucia Bureau of Standards (SLBS). By developing clear composition and performance criteria for acceptable alternatives, the SLBS can play an active role in inspecting establishments and verifying compliance. Expanding enforcement authority beyond the DSD would help improve monitoring coverage and regulatory enforcement.

Amend the Act to allow the DSD to directly prosecute violators, rather than relying solely on court proceedings. This would help expedite legal action against non-compliant businesses, reducing delays caused by court system backlogs and serving as a stronger deterrent to discourage violations. This would likely require several legal and structural changes, which could include identifying 'authorised officers' within the department who would have summary offence ticketing powers, allowing them to issue fines directly.

Close regulatory loopholes in the existing ban that currently exempt single-use plastic items labelled as "reusable". While technically some plastic straws and utensils could be reused, in practice, they are often discarded after a single use. Strengthening these regulations will help prevent misclassification and further reduce single-use plastic waste.

Recognizing that some violations may result from a lack of—or lapses in—awareness, and strengthening public outreach and education are also essential to ensure widespread compliance with the Styrofoam and Plastic Food Service Containers (Prohibition) Act, 2019. To address this, we propose the following recommendations:

Implement regular and ongoing public education and awareness-raising campaigns to reinforce public awareness of banned items and prevent unintentional violations. These efforts could include:

- Public service announcements via radio, television, and digital platforms.
- Social media campaigns to engage a broad audience with clear, accessible information. These are often most effective when delivered through well-known local influencers whose followers align with the target audience.
- Retailer signage to remind consumers at points of purchase.
- Business training sessions to ensure compliance within the commercial sector.
- Engagement with schools and youth organizations to instil long-term behavioural change (see Section 5.11.1 for more on this).

By expanding enforcement authority, streamlining prosecution processes, and ensuring continuous public education, Saint Lucia can ensure more effective implementation of the ban and reinforce its commitment to reducing plastic waste leakage into the environment.

Managing biodegradable alternatives

The proper disposal of biodegradable and compostable alternatives is essential to ensure that these materials break down as intended, rather than accumulating in landfills or contaminating future plastic recycling streams in Saint Lucia. Without appropriate waste management strategies, these alternatives may compete for limited landfill space at the Deglos landfill or hinder recycling efficiency.

To support the effective management of these materials, we propose the following recommendations:

Establish a separate collection and composting system for biodegradable plastics. This will be required if they are to continue to be imported into Saint Lucia. Clearly, this will require time to implement and should be recognised as a medium-to-long-term plan. A composting shed opened at the Deglos landfill in October 2024, and upgrades could be made to this facility to ensure that it provides the necessary heat, moisture and microbial activity necessary to effectively break down biodegradable materials.

Establish clear standards for biodegradable alternatives to ensure that only genuinely biodegradable materials are imported into Saint Lucia. There is no universally accepted international standard for biodegradability and various certifications exist, so it is essential to review and prioritise these standards. Importers of products should then be required to verify their environmental claims against these recognized international benchmarks.

By implementing these measures, Saint Lucia can maximize the environmental benefits of biodegradable alternatives while ensuring their proper disposal and integration into the broader waste management system.

Case Study

Biodegradable plastics - a suitable alternative?

What are biodegradable plastics?

Biodegradable plastics can be bio-based, or petroleum-based, and are designed to disintegrate when exposed to naturally occurring bacteria. The term ‘bio-based’ refers to materials made from renewable biomass sources, such as plants and algae (Moshood et al., 2022). Only some biobased plastics are biodegradable, as highlighted in the figure on page 67.

Challenges of biodegradable plastics

All single-use items, whether biodegradable or not, have detrimental environmental impacts (Miller et al., 2019; Herberz et al., 2020).

Biodegradable plastic still relies on the ongoing production of energy-intensive feedstocks and manufacturing processes to create materials designed for single-use and rapid disposal (Schulze et al., 2017). **This approach continues to support an unsustainable throw-away culture, reinforcing a linear economy and wasteful production and packaging practices.**

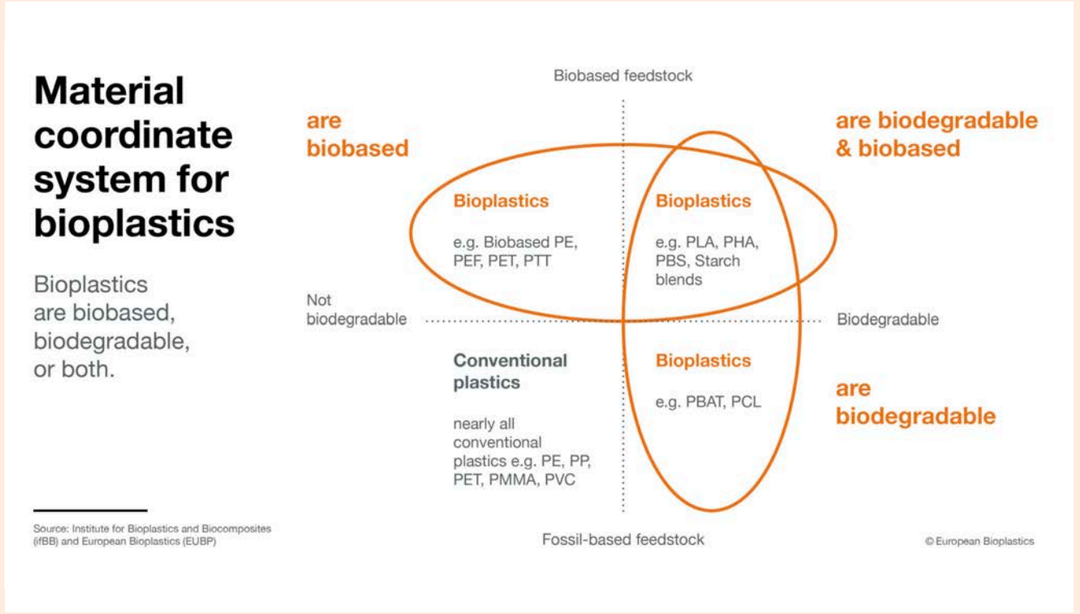
Biomass feedstocks, particularly from industrial agriculture, can lead to deforestation, soil degradation, water scarcity, pollution, biodiversity loss, climate change, and other social issues, including land and food security risks for vulnerable communities. Alternatives from inedible food waste are not yet available at a sufficient scale to replace fossil-based plastics entirely. Furthermore, many biodegradable plastics are designed to break down only under specific conditions, like industrial composters, and their degradation in natural settings like oceans or lakes is not clearly established and is influenced by various factors, including light and temperature.

No biodegradable products have yet been approved as marine biodegradable, and the European standard for biodegradable and compostable packaging EN 13432 only ensures the biodegradation of packaging under controlled industrial conditions (Surfrider Foundation Europe et al., 2017).

While some biodegradable plastics are recyclable, they **need to be processed in separate recycling streams to prevent contamination** and maintain the quality of recycled fossil fuel-based plastics, adding complexity and cost to the recycling process.

Recommendations

Biodegradable plastics should only be considered if they adhere to strict, recognized standards, and even then, only as part of separate organic waste collection and composting systems (GAIA 2020). This is a clear challenge in Saint Lucia as this separate collection system does not yet exist.



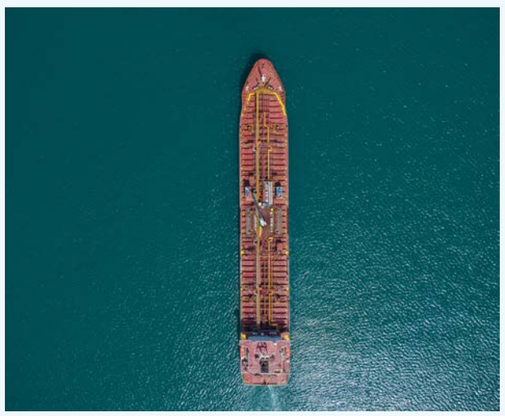
Strengthening data collection for effective policy evaluation

Finally, to effectively evaluate the impact of the Act, **it is essential for Customs to collect more detailed import data to accurately identify the types and quantities of plastics entering Saint Lucia.**

Currently, all imported plastics are classified under the broad Harmonized System (HS) code 3926, which encompasses “Plastics and Articles Thereof.” However, this general classification does not provide the granular data needed to track specific plastic materials.

A more detailed classification system – using subheadings or tariff lines – adds extra digits beyond the first four in the HS code to distinguish specific plastic types. For example, Polyethylene Terephthalate (PET) is typically classified under HS code 3907.60 when imported in its primary form. At present, Customs does not record these detailed subheadings, limiting the ability to effectively monitor compliance with the plastic regulations.

Recognizing this gap, Customs is aware of the need for improved classification and has indicated plans to begin recording tariff lines in a digital format. Implementing this system will be critical for tracking and enforcing the ban, ensuring that Saint Lucia can accurately assess progress and strengthen its plastic management efforts.



Recognizing that some violations may result from a lack of—or lapses in—awareness, and strengthening public outreach and education are also essential to ensure widespread compliance with the Styrofoam and Plastic Food Service Containers (Prohibition) Act, 2019. To address this, we propose the following recommendations:

Implement regular and ongoing public education and awareness-raising campaigns to reinforce public awareness of banned items and prevent unintentional violations. These efforts could include:

- Public service announcements via radio, television, and digital platforms.
- Social media campaigns to engage a broad audience with clear, accessible information. These are often most effective when delivered through well-known local influencers whose followers align with the target audience.
- Retailer signage to remind consumers at points of purchase.
- Business training sessions to ensure compliance within the commercial sector.
- Engagement with schools and youth organizations to instil long-term behavioural change (see Section 5.11.1 for more on this).

By expanding enforcement authority, streamlining prosecution processes, and ensuring continuous public education, Saint Lucia can ensure more effective implementation of the ban and reinforce its commitment to reducing plastic waste leakage into the environment.

5.4 The Management of Beverage Containers Bill

THE BILL HAS THE POTENTIAL TO REDUCE MARINE PLASTIC POLLUTION BY

32 TONNES

PER YEAR AND REDUCE THE AMOUNT OF PLASTIC WASTE LANDFILLED BY 2,427 TONNES PER YEAR BY 2035.

Summary

Overview:

- GOSL has been developing a deposit return scheme for single-use beverage containers for several years and it is currently awaiting Cabinet approval.
- Deposits will be channelled through a new Management of Beverage Containers (MBC) Fund, managed by the SLSWMA.
- The scheme will introduce an XCD 15 cent deposit on beverage containers less than 5 litres in volume. The deposit will be refunded when consumers return empty containers to a network of return depots.

Recommendations:

- Conduct a stakeholder mapping exercise to identify gaps in support if Cabinet approval is not received.
- A stakeholder mapping exercise would also be valuable for enhancing awareness and transparency within Saint Lucia's plastics value chain.
- Provide training and technical support to the SLSWMA, as the intended administrator of the MBC fund.
- Put measures in place to deal with legacy waste. Options include: collecting deposits for a period before commencing refund payment; or providing a one-off injection of funding to cover the costs of handling legacy waste.
- Develop a comprehensive monitoring and evaluation (M&E) framework to ensure the successful long-term operation of the DRS.
- Establish a national-level waste management forum.

5 Policy analysis

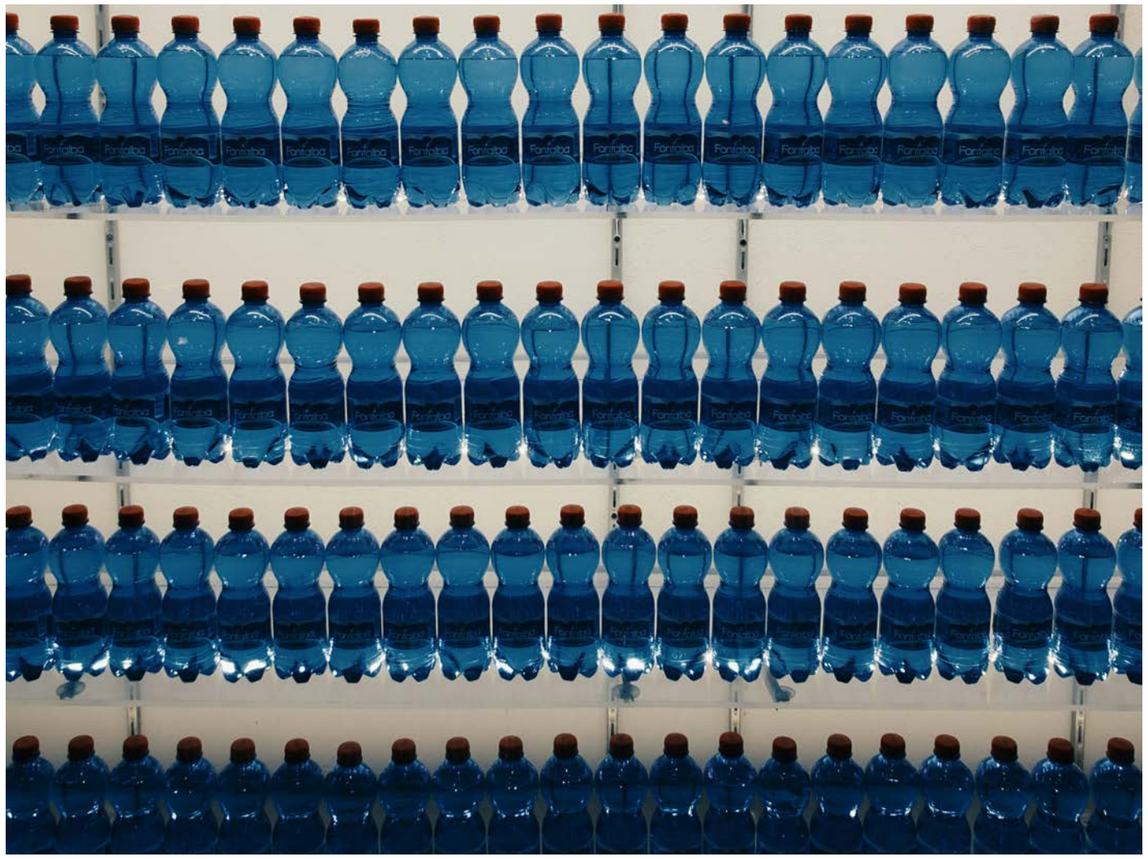
Overview

The Management of Beverage Containers Bill intends to introduce a deposit return scheme (DRS) to Saint Lucia, requiring consumers to pay a 15 XCD cent deposit when purchasing beverages in plastic containers. This deposit will be fully refunded upon the return of empty containers to designated redemption depots. The primary objective of the Bill will be to enhance the source separation and collection of plastic beverage containers across all levels – household, institutional, sectoral, and national – to significantly reduce plastic waste leakage into the environment.

The Bill will apply to plastic beverage containers of five litres or less, specifically single-use plastic bottles that contain or previously contained a beverage. However, it excludes refillable beverage containers that can be reused by brand owners without requiring remanufacturing. The scope of the Bill will cover plastic beverage containers not already prohibited under the Styrofoam and Plastic Food Service Containers Act No. 22 of 2019.

This Bill has been identified as a priority initiative by the DSD. To support its implementation, Unite Caribbean conducted a comparative study, developed a cost model, and revised the draft National Policy on the Disposal of Beverage Containers in 2024.

As of February 2025, the DSD has drafted a Cabinet Memo and is working towards securing Cabinet approval of the National Policy in the first quarter of 2025. Once approved, this policy will form the foundation for the development of the Management of Beverage Containers Bill. The Bill will then need to be resubmitted to the Cabinet for final approval before the deposit return scheme can be established and operationalised.



Assessment

The modelling for this policy has been informed by the financial model developed by Unite Caribbean. It assumes that the DRS will target bottles less than 5L in size; and will be implemented from 2026 onwards, with a return rate of 50% in year one, growing to 80% by year seven (2032).

Under these assumptions, the Management of Beverage Containers Bill could result in a 32-tonne reduction in marine plastic pollution per year by 2035 (Figure 5.5) and reduce the amount of plastic waste landfilled by 2,427 tonnes per year by 2035.

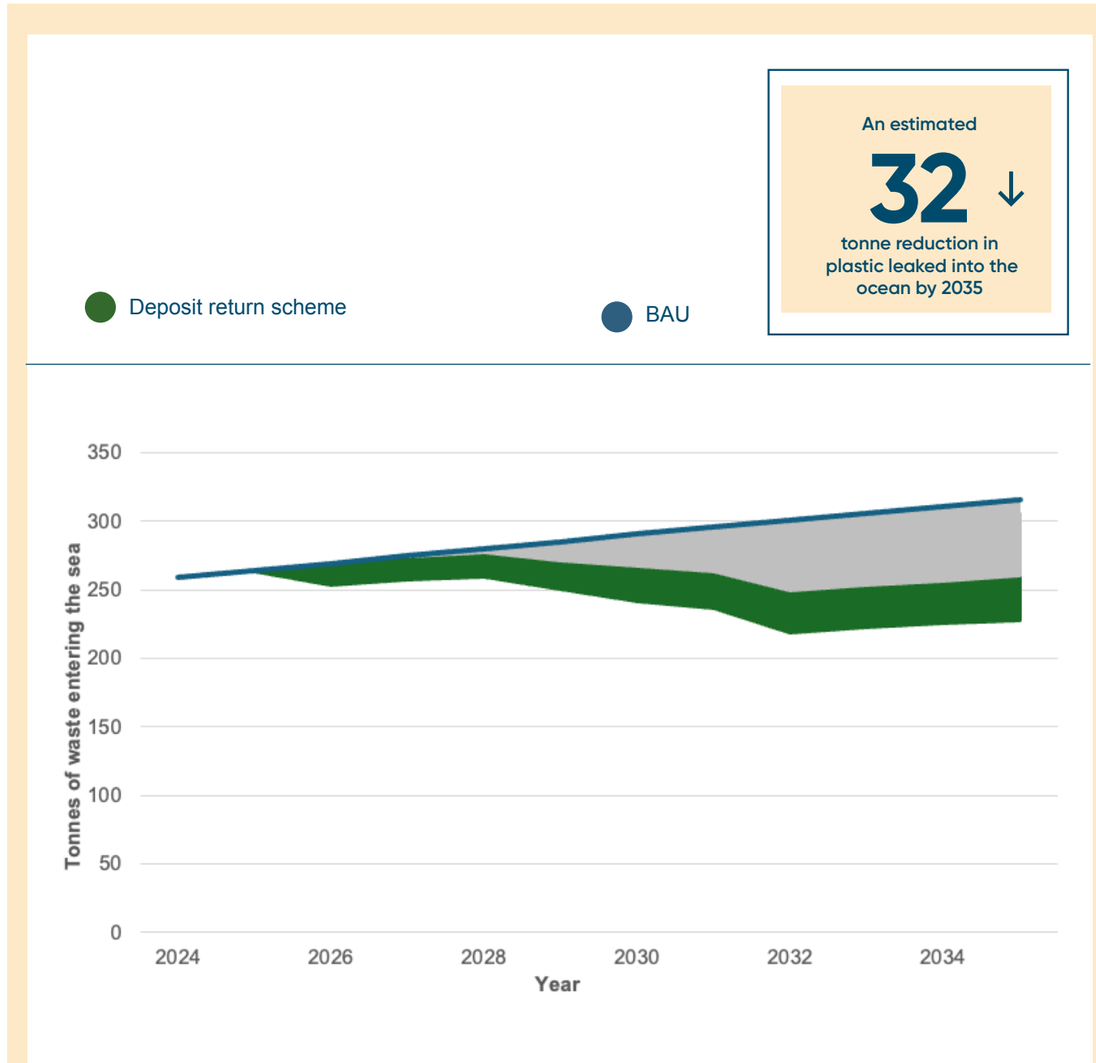


FIGURE 5 5 PLASTIC POLLUTION REDUCTION POTENTIAL OF THE MANAGEMENT OF BEVERAGE CONTAINERS BILL IN SAINT LUCIA

Pre-Cabinet approval

In the event that the National Policy or the Bill is not approved by the Cabinet, **we recommend that DSD should undertake a stakeholder mapping exercise to identify gaps in support** and areas requiring targeted engagement.

Based on the findings, we recommend it develops tailored communication and advocacy initiatives to address key barriers. These may include direct outreach, such as letters from members of the Plastics Coordinating Committee expressing strong support for the policy and subsequent Bill. Additionally, highlighting the entrepreneurial opportunities that the system may generate – particularly for youth – could enhance stakeholder engagement.

For example, demonstrating potential business opportunities—such as the establishment and operation of redemption depots and the transport of collected materials—to entities like the Youth Economy Agency (YEA) may strengthen support for the legislation.

Post-Cabinet approval

A stakeholder mapping exercise would also be valuable for enhancing awareness and transparency within Saint Lucia's plastics value chain. In particular, such an exercise would facilitate a comprehensive understanding of the private recycling sector, including the number of active recyclers, their available equipment (e.g. balers, shredders, and compactors), and their potential engagement in establishing redemption depots following the enactment of the Management of Beverage Containers Bill.

At present, many stakeholders in Saint Lucia's plastics value chain operate independently, with limited visibility of other actors in the sector. The financial model developed by Unite Caribbean projects the establishment of 10 redemption depots across the island, recognizing that a well-distributed and accessible network of depots is essential for the effective implementation of the DRS.

A stakeholder mapping exercise would provide critical insights into the feasibility of meeting this target, identifying potential gaps in geographical coverage and informing strategic planning efforts.

Table 5.3 presents a preliminary mapping of private recyclers in Saint Lucia, and can be built upon to include plastic producers, bottlers, licensed waste collectors, relevant NGOs, and others key stakeholders in the plastic value chain in Saint Lucia.

TABLE 5.3: MAPPING OF ACTIVE RECYCLERS IN SAINT LUCIA: SOURCES OF THEIR RECYCLABLE MATERIALS AND THEIR FINAL PROCESSING DESTINATIONS

Source	Collection	Processing for export	Recycling in country
Landfill	Plastic Solutions (HDPE & LDPE into plastic bags)		Plastic Solutions (HDPE & LDPE into plastic bags)
Households	Biohelps (bulky white goods) Private waste haulers (municipal solid waste)	Biohelps (bulky white goods)	
Commercial (including hotels)	Biohelps (bulky white goods)	Biohelps (bulky white goods)	
Industrial	Private waste haulers (municipal solid waste)		
Not specified	• Renew St Lucia (currently primarily involved in metal recycling) • Greening the Caribbean (collecting and stockpiling) • Recyclene (recently ceased business in collection and exporting Heineken's waste and currently exploring alternative business plans in waste management) • Jua Kali (recently restarted business and exploring partnership opportunities with other organizations - currently no activities of their own)		

Establishing a national-level waste management forum

To further support coordination and collaboration within the sector, we recommend **establishing a national-level waste management forum.** This would offer a structured platform for dialogue, knowledge exchange, and multi-stakeholder engagement.

This forum would build synergy among key actors in the plastics value chain, addressing the current fragmentation and ensuring a more cohesive approach to waste management. The stakeholder mapping exercise would be essential in shaping the forum by identifying and engaging relevant participants, ensuring inclusivity and comprehensive representation.

Once the Bill is approved by Cabinet, the Management of Beverage Containers Fund (MBC Fund) must be established to facilitate the effective operation of the DRS.

The Saint Lucia Solid Waste Management Authority (SLSWMA) will serve as the administrator of the fund. **To ensure the fund's smooth implementation, it will be necessary to provide training and technical support to the SLSWMA,** possibly with assistance from the Inland Revenue Department (IRD), which manages the collection of Value Added Tax (VAT) in Saint Lucia.

Legacy waste is a significant challenge at the outset of a DRS; this includes plastic beverage bottles that pre-date the deposit system and on which no deposits have been paid. These bottles require additional financial resources to cover refunds. Some countries address this issue by applying specific labels to qualifying beverage bottles to prevent legacy waste from being returned for a refund. However, this strategy introduces complexities for local manufacturers and for beverage importers in Small Island Developing States (SIDS), who may struggle to obtain customized labels from overseas manufacturers, given their relatively small market size.

An alternative and simpler solution is to allow refunds on all whole and clean beverage bottles. Ensuring that bottles are free of dirt and contamination is crucial, as unclean shipments risk rejection by overseas recycling processors or impoundment by quarantine authorities. By requiring that only whole and clean bottles be eligible for refunds, the amount of legacy waste presented for redemption can be reduced, thereby alleviating financial strain (JICA, 2022).

Nonetheless, the issue of legacy waste represents a significant cash-flow consideration that must be carefully addressed in the system's design and early implementation phases. To address the funding needs for legacy waste, two common approaches can be considered:

- **Pre-collection of deposits** – Deposits could be collected for a period before refunds are paid out, allowing the MBC Fund to accumulate enough resources to cover the costs of legacy waste. This model has been successfully implemented in other SIDS, including Palau and Tuvalu.

- **Securing one-off funding** – Alternatively, one-time funding could be sourced to cover the collection and refund costs associated with legacy bottles. This method is discussed in the Marshall Islands case study, below.

To estimate how much funding will be required, DSD should analyse the annual consumption of beverage bottles (<5 litres) in the year preceding the DRS implementation, along with an assessment of the existing beverage bottle litter quantity. This data, combined with the deposit amount, will provide an estimate of the financial resources needed to address legacy waste.

Finally, **a comprehensive monitoring and evaluation (M&E) framework** is essential to ensure the successful long-term operation of the DRS.

A baseline analysis, conducted prior to implementation, will establish reference points from which progress can be measured.

The M&E framework should include clearly defined indicators, data collection protocols, and mechanisms for stakeholder engagement. This system will enable ongoing assessment of the DRS' effectiveness, allowing the managers to make adjustments and refinements as needed, ensuring both the financial sustainability of the system and the achievement of environmental objectives.

Case Study

Seed Funding for Legacy Waste Clean-up in the Marshall Islands

The Republic of the Marshall Islands (RMI) is a group of coral atolls and islands located in the central Pacific Ocean.

Before launching its Deposit Return Scheme (DRS), RMI allocated $100,000, obtained from a fishing boat fine, as seed funding to address legacy waste. This funding was used to:

- Clear legacy waste, funding the collection of approximately 1.66 million cans and bottles

- Build recycling infrastructure, including collection sites and processing facilities; and

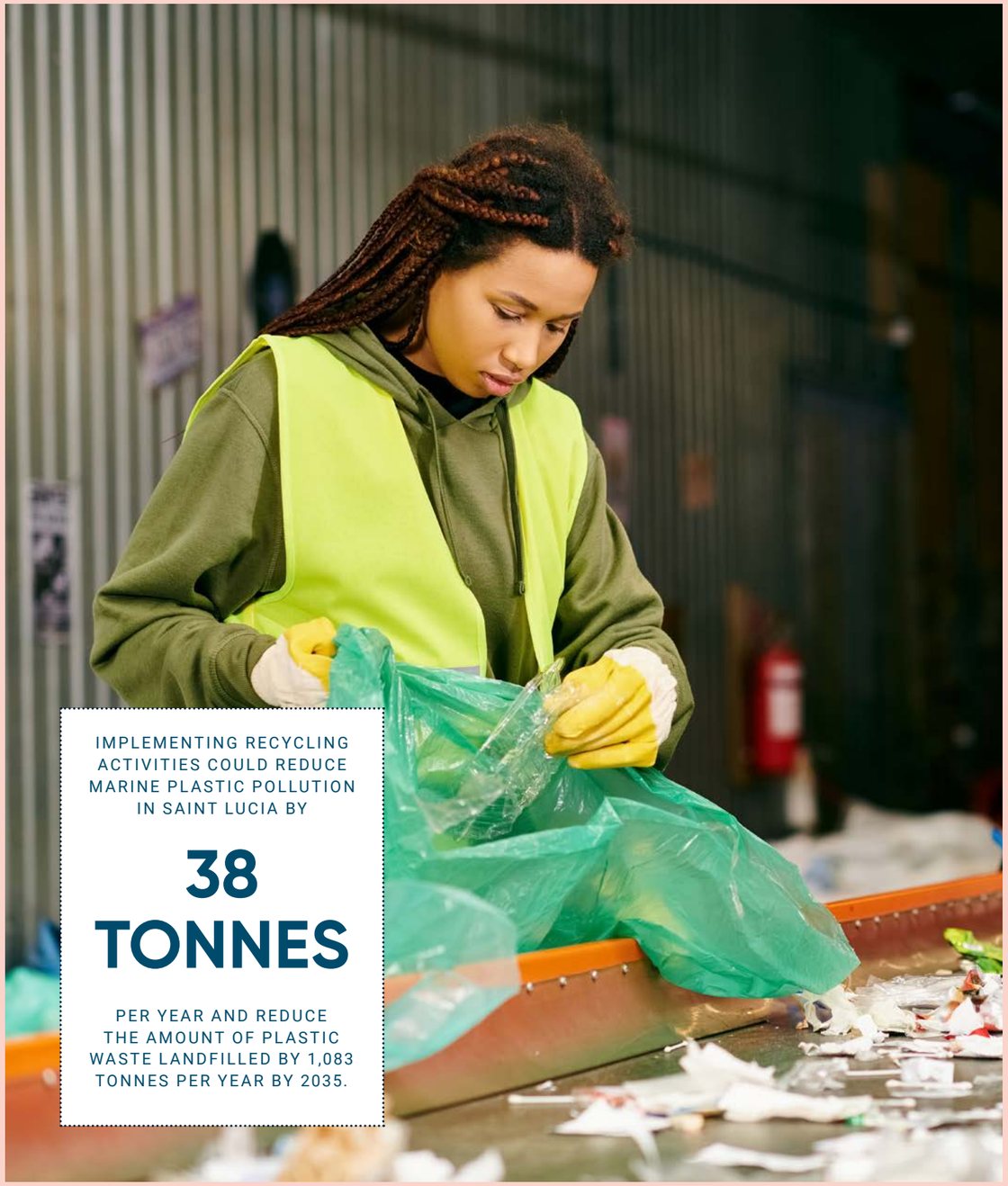
- Engage communities, raising awareness and encouraging participation.

However, the legacy waste far exceeded the 1.6 million items covered by the seed funding – the actual number of legacy items refunded was approximately 2.5 million. This meant that un-redeemed deposits had to be used to pay for refunds on the rest of the legacy waste, which resulted in the fund being under great strain in its first year of operation. However, once they had cleared the legacy waste, the fund's balance recovered to a healthier and more consistent level.

The RMI's experience underscores the need to account for pre-existing waste before launching a DRS to ensure financial stability and sustainability.

By initially allocating funds to clear legacy waste, build infrastructure, and engage communities, the RMI successfully kickstarted its scheme. However, it still encountered challenges due to the sheer volume of legacy waste exceeding initial estimates. This highlights the importance of accurately assessing the scale of legacy waste beforehand to prevent financial shortfalls and ensure a smoother transition to a sustainable DRS.

5.5 Waste segregation and recycling activities



IMPLEMENTING RECYCLING ACTIVITIES COULD REDUCE MARINE PLASTIC POLLUTION IN SAINT LUCIA BY

38 TONNES

PER YEAR AND REDUCE THE AMOUNT OF PLASTIC WASTE LANDFILLED BY 1,083 TONNES PER YEAR BY 2035.

Summary

Overview:

Plastic recycling in Saint Lucia is currently very limited.

There are several active recycling companies, but most currently focus on recycling more valuable materials such as metals and eWaste.

With the correct support, the current value chain could be enhanced to provide a thriving recycling sector.

Recommendations:

- Conduct a recycling pilot in Castries and Vieux Fort. This will facilitate the collection of data on the feasibility, operational efficiency, and consumer engagement with the return-to-depot system for recyclable plastic materials.
- The pilot, and national-level roll-out should be phased, starting with HDPE in year one, and expanding to include various rigid and flexible plastics in year two.
- The programme will likely require financial or material incentives such as retail points or monetary refunds in the short term to encourage participation.
- Identify local and international end markets for recycled plastic products.
- Apply lessons learned from the pilot to national-level roll-out.
- Implement the Recycle OECS project proposal to provide source segregation for hotels.
- The SLHTA & SLSWMA could seek to establish a similar collaboration between the hotels, as was successfully achieved in Grenada under the Recycle OECS project.
- Support the private sector to help build capacity and long-term sustainability for recycling.

5 Policy analysis

Overview

This section covers the three recycling-related activities under Pillar 2: Waste Minimisation of the ML-MAP, namely:

- Activity 1: Develop a programme for waste segregation in one of the 11 waste collection zones
- Activity 2: Develop guidelines and standards for waste minimisation and segregation at hotels, commercial and institutional establishments, and manufacturing operations
- Activity 3: Develop and implement a programme to promote the recovery, recycling, and reuse of specific waste streams

Source segregation, whereby separate bins are provided for different waste streams, has been widely adopted as a way to effectively increase the recycling of household and business waste. This is because extracting recyclable materials from mixed waste is costly, challenging and typically results in much lower quality and quantities of separated recyclable materials.

Assessment

Consultations with the Department of Sustainable Development and the Saint Lucia Solid Waste Management Authority suggest that the collection of source-segregated recyclables from individual households is unlikely to be feasible in the coming decade. This is due to financial and capacity constraints faced by the institutions responsible for solid waste management in Saint Lucia.

There are also currently very few recyclers who process plastic waste on the island (see Table 5.3 for an overview of private sector plastic recyclers in Saint Lucia).

In response to this, we propose that, instead of source segregation at the household level, the redemption depots—established under the Management of Beverage Containers Bill (MBCB) (see Section 5.3 above)—should function as drop-off points for a broader range of plastic items.

This phased approach will progressively expand the scope of accepted materials, facilitating improved recovery and recycling efforts. The establishment of a comprehensive and accessible redemption depot network will be critical to the overall success of this recycling scheme, ensuring greater public participation and environmental impact.

Several key factors must be considered when determining which types of plastic packaging to include in recycling schemes. These considerations include:

- The feasibility and cost-effectiveness of collection.
- The ability to efficiently sort the materials from mixed recyclables and separate them from other plastic polymers.
- The presence of disruptive elements in the packaging, such as labels, adhesives, fillers, additives, laminated structures, and non-plastic components or different plastic polymers, which may hinder the recycling process.
- The availability of stable and reliable end markets for the collected materials, ensuring a sustainable revenue stream for the recycling system—an issue of particular relevance in Saint Lucia.

Referencing key designs for recyclability guidelines in the US and Europe (e.g. Association of Plastics Recyclers, n.d.; US Plastic Pact, n.d.), and considering the types of plastic currently being collected by high performing countries, we propose that the scheme includes the following plastic packaging types:

We propose a phased approach to improving plastic recycling in Saint Lucia, beginning with a recycling pilot programme in 2027, targeting households in Castries and Vieux Fort.

In its first phase, the pilot will focus on high-density polyethylene (HDPE) items such as bottles, pails, buckets, tubs, pots, and trays, aiming for a target recycling rate of 60% at full impact.

Rigids:

- HDPE bottles
- HDPE pails, buckets, tubs, pots and trays
- PET thermoformed containers, tubs, trays etc.
- PP bottles, jugs and jars
- PP pails, buckets, tubs, pots, tubes and trays
- PS containers
- EPS – expanded polystyrene transport packaging

Flexibles:

- HDPE and LDPE flexible and film Items (mono material)
- PP films (mono material)

In 2028, the scope of the pilot will expand to include a wider range of rigid plastics—such as polyethylene terephthalate (PET) containers, polypropylene (PP) bottles, jugs, jars, and pails, as well as polystyrene (PS) containers and expanded polystyrene (EPS) transport packaging. It will also include flexible plastic items made from HDPE, low-density polyethylene (LDPE), and PP films, all in mono-material forms. The target recycling rate for these materials is 50%.

Building on the pilot, a national-level recycling scheme is expected to launch in 2029, initially focusing on the same HDPE items as the pilot, with a full impact recycling rate target of 40%.

By 2030, the national scheme will broaden its scope to include the same range of rigid and flexible plastics as the expanded pilot phase, with a target recycling rate of 30% for these materials.

In addition to the household and national recycling initiatives, we propose a hotel recycling scheme to address plastic waste generated by hotels, commercial establishments, institutions, and manufacturing operations. The scheme is expected to begin in 2028, initially targeting HDPE items such as bottles, pails, buckets, tubs, pots, and trays, with a full impact recycling rate of 40% anticipated by 2031.

In 2029, the programme will expand to include a broader range of rigid plastics—including PET thermoformed containers, PP bottles, jars, jugs, pails, trays, and PS and EPS packaging—as well as flexible mono-material plastics such as HDPE, LDPE, and PP films. These additional categories are expected to reach a 30% recycling rate by 2032. The scheme aims to significantly reduce plastic waste from the hospitality and commercial sectors, complementing national efforts to improve plastic waste management and recycling rates.

Under these assumptions, implementing these recycling activities could reduce marine plastic pollution in Saint Lucia by 38 tonnes per year by 2035 (Figure 5) and reduce the amount of plastic waste landfilled by 1083 tonnes per year by 2035.

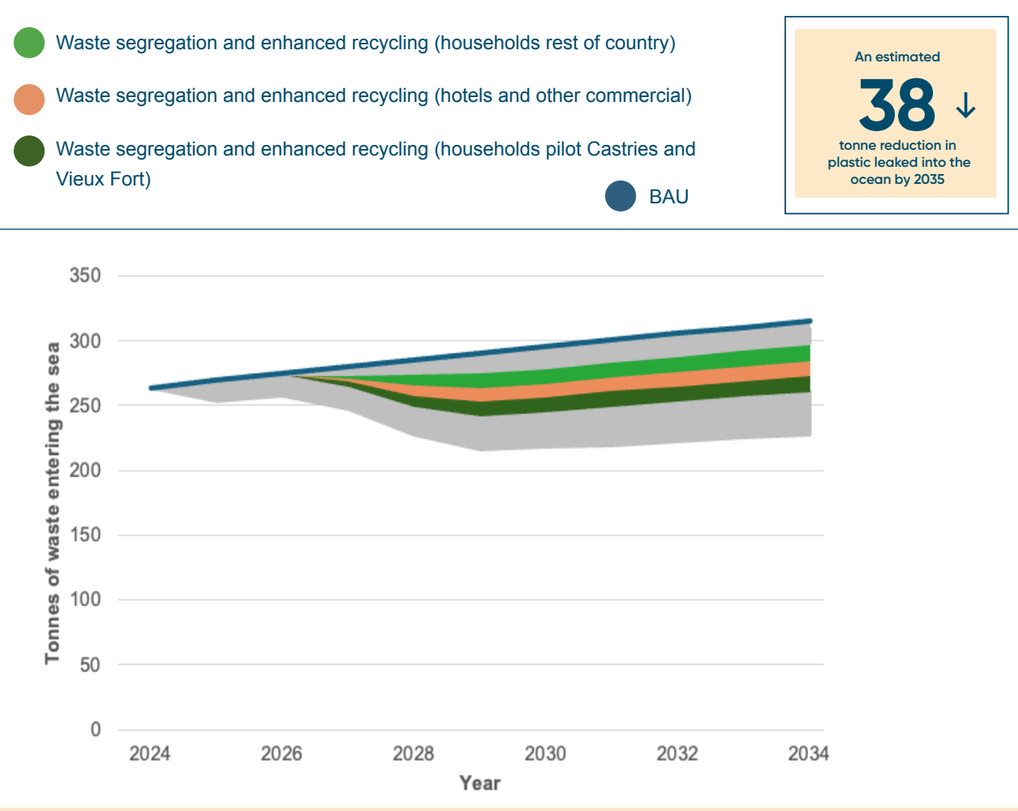


FIGURE 5 6: PLASTIC POLLUTION REDUCTION POTENTIAL OF RECYCLING ACTIVITIES IN SAINT LUCIA

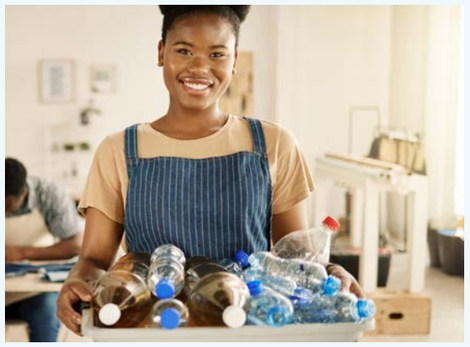
Recommendations

Household recycling pilot and nationwide roll-out

We propose that a recycling pilot should first be conducted in Castries and Vieux Fort. This will facilitate data collection on the feasibility, operational efficiency, and consumer engagement with the return-to-depot system for recyclable plastic materials.

The selection of Castries and Vieux Fort as pilot locations is strategic. These two urban centres represent the northern and southern regions of the island, covering a significant proportion of the national demographics. This will ensure that the pilot provides representative data across different socioeconomic groups and their related behaviours.

Active consumer participation is a crucial factor in the success of this initiative. Global recycling programs have shown that financial or material incentives, coupled with public education campaigns, can significantly boost public engagement. However, sustaining financial incentives in the long run can be challenging. This is especially true in a SIDS context, where most recycled plastic is exported to international recyclers, and export costs often match or exceed the value of the recycled materials (see the lessons learned on this from the RePLAST OECS project in the case study below).



Therefore, any incentive system should be temporary and designed to promote lasting behavioural change. Once consumers develop the habit of sorting and returning waste to depots, the incentives should be gradually reduced and eventually phased out. Potential incentives may include:

- **Retail Points-Based Rewards:** consumers could earn points, redeemable at major retail outlets such as Massy Stores, encouraging repeated participation.
- **Monetary Refunds:** a direct refund system, whereby consumers receive a small sum per returned item, can provide a tangible motivation to return recyclables.

Levies such as those placed on plastic bags (see Section 5.9.1) and polypropylene single-use items (PP) (see Section 5.2.4) could finance these time-bound incentives. Additionally, new levies on particularly problematic plastic items – such as multi-layered plastic packaging and hard-to-recycle plastic goods – could generate further funding for the initiative.

The successful implementation of the pilot initiative must also be supported by a comprehensive public communication and education campaign to enhance awareness and encourage active participation.

This campaign should provide clear and accessible information, in both English and Kwéyol, on:

- the specific types of plastic materials accepted at redemption depots,
- the locations of these facilities,
- the socio-economic and environmental benefits of recycling, and
- the incentives available for returning recyclable materials.

It will be essential to strengthen public engagement through targeted outreach and educational efforts to maximize the pilot's impact and foster a culture of responsible waste management. While economic incentives for waste separation practices can be more effective than social impact strategies in the short term, they may only be effective at the early stages of promoting waste separation, while the effect of social norms built during this stage are often longer-lasting (e.g. see Zu et al., 2018).

Once the pilot programme has been evaluated, the findings should be used to refine the system before national implementation. Lessons learned regarding consumer behaviour, depot efficiency, and the effectiveness of incentives will shape the final framework to ensure maximum impact. By adopting this strategic, data-driven approach, Saint Lucia can take a significant step towards reducing plastic waste, enhancing recycling rates, and promoting sustainable environmental practices for the long term.

Identifying both local and international end markets for recycled plastic products will be essential to ensure the long-term viability of these recycling initiatives.

This process should be informed by lessons learned from previous and ongoing recycling efforts in Saint Lucia. These include RePLAST OECS and Recycle OECS, as well as the experiences of private sector recyclers such as Biohelps and Recyclene, which have successfully exported plastics to international buyers. They also include Plastic Solutions, who recycle HDPE and LDPE into plastic bags. Please see Table 5.3 for an overview of private sector plastic recycling initiatives in Saint Lucia.

Establishing partnerships with other Caribbean islands to jointly export recycled plastic may help to achieve economies of scale. This approach could lead to significantly lower shipping costs per unit, which could in turn generate sufficient revenue to cover the logistical and operational expenses involved.

Case Study

Incentive-based system for recycling in Saint Lucia – RePLAST project

The RePLAST OECS Pilot Plastic Recycling project was launched in May 2019, aiming to establish a sustainable plastic recycling system in Saint Lucia that could be replicated in the wider Caribbean. The project operated for two years, closing in April 2021. The pilot centred around a digital incentive scheme supported by public-private partnerships to encourage the collection of PET and HDPE through the following methods:

- **Community collection:** a pop-up style collection and a stationary collection with a fixed location
- **School collection:** this involved the installation of recycling bins at strategic points on the school premises as well as a storage and sorting area
- **Hotel collection:** whereby staff deposited bottles in bins in the back area of the properties for later collection by a contractor

The incentive scheme was a critical part of the RePLAST project. It was based on a reward card and points earned in exchange for PET and HDPE plastic bottles returned. These points were redeemable at RePLAST Business Partners such as Massy Stores. However, the system was not a sustainable model due to several factors, including:

- The community collection system was not sustainable as it relied on volunteers to staff the drop-off points.
- The incentive reward system was not sustainable as it was based on the voluntary involvement of patrons and the pilot was only able to secure short-term commitments.
- The overall cost of collection, sorting, baling and shipping plastic exceeded the value gained from the sale of the material and was therefore not able to financially self-sustain the system

Recycling scheme at hotels and other commercial establishments

The Recycle OECS project included designing a community and schools-based plastic collection initiative in Saint Lucia, with a detailed action plan ready to be implemented by a dedicated project coordinator. The proposed approach includes participation from a variety of stakeholders including hoteliers, school representatives, corporate sponsors, and recyclers. We propose that this action plan should be taken forward as a means of introducing source segregation at hotels in Saint Lucia.

Community component

The community collection component involves establishing fixed collection points at participating hotels and resorts, with the SLSWMA facilitating collection. The identified hotels include:

- Sandals Grande
- Sandals La Toc
- Sandals Halcyon
- Royalton St Lucia
- Windjammer Landing
- The Landings

The SLSWMA and the SLHTA could seek to establish a collaboration between the hotels similar to that which was successfully achieved in Grenada under the Recycle OECS project. We have included more details on this initiative in the case study below.

One of the lessons learned from RePLAST centred around the challenges of securing long term financial commitment from the private sector to support recycling initiatives. One option is that funding from unclaimed deposits from the proposed DRS could go towards supporting the SLSWMA to facilitate the collection of recycled materials from hotels.

This would ensure the recyclers do not bear the financial burden of collection and transportation to their facilities, thereby reducing the costs to their business. Removing this cost would contribute towards a more financially viable system for recyclers to engage in the processing and exportation of the collected material.

Case Study

Recycle OECS - Grenada hotel joint collection system

The Recycle OECS project aimed to design and pilot a sustainable and replicable model for recycling in the OECS region. This project built on the lessons learned from RePLAST and pilots in Grenada and Dominica. The organisers implemented collection systems under the technical pillar of the model.

In Grenada, this included an agreement among participating hotels to establish a system together. On Earth Day 2024, the Grenada Solid Waste Management Authority (GSWMA) and the Grenada Hotel and Tourism Association (GHTA) signed a Memorandum of Understanding at the Queen's Part Material Recovery Facility (MRF), confirming their partnership at an event attended by government officials and industry leaders. The agreed system included hotels separating their HDPE and PET plastic waste and the GHTA, which was responsible for coordinating transport of material to the MRF.

5.6 Waste minimisation guidelines

THE INTRODUCTION OF WASTE MINIMISATION GUIDELINES FOR THESE SECTORS COULD REDUCE MARINE PLASTIC POLLUTION IN SAINT LUCIA BY SIX TONNES PER YEAR AND REDUCE THE AMOUNT OF PLASTIC WASTE LANDFILLED BY

184 TONNES

PER YEAR BY 2035.

Summary

Overview:

A range of efforts have been undertaken to-date to encourage waste minimisation in hotels.

An initial review indicates that currently, there are no specific waste minimisation guidelines or initiatives targeted at institutions, commercial or manufacturing businesses, or the construction sector in Saint Lucia.

Recommendations:

- Undertake a comprehensive review of existing sectoral guidelines and relevant documentation.
- Develop guidelines tailored to each sector (i.e., hotels, institutions, commercial and manufacturing businesses and the construction sector)
- Formalise the requirement for waste minimisation plans as part of the development process (via the DCA).
- Develop tailored training and capacity-building initiatives to support the implementation of the guidelines.
- Establish robust monitoring and evaluation mechanisms to monitor the progress of guideline implementation.
- Consider the use of incentives (e.g. competitions, certification schemes).

5 Policy analysis

Assessment

There have already been several initiatives to encourage waste minimisation in hotels in Saint Lucia. For example, the Saint Lucia Hospitality and Tourism Association's (SLHTA) Environmental Committee developed an Environmental Best Practice Handbook in 2019. This document outlines the sustainable best practices adopted by hospitality operations in Saint Lucia to minimize resource consumption, reduce waste generation, and lower their overall environmental impact.

UNEP's Low Carbon and Resource Efficient Action Plan for Accommodation in Saint Lucia sets out a series of targets for reducing single-use plastics, including a 30% reduction in overall waste generation and the elimination of single-use plastic by 2030. An initial review indicates that, currently, no such guidelines exist for the other sectors covered by this policy (commercial, institutional, manufacturing and construction).

This policy was modelled with the assumption that the guidelines would be in place by 2026, leading to a 10% reduction in plastic waste generation in hotels and a 5% reduction across the other sectors by 2031.

Waste minimisation guidelines are likely to have a higher reduction impact in hotels because they generate a more consistent and controllable stream of plastic waste from daily operations. This makes targeted interventions easier to implement compared to more complex and variable sectors like construction. Additionally, hotels present several 'low-hanging fruit' opportunities – such as replacing single-serve bathroom products and eliminating unnecessary single-use items – that can yield immediate and visible reductions in plastic waste.

Under these assumptions, the introduction of waste minimisation guidelines for these sectors could reduce marine plastic pollution in Saint Lucia by six tonnes per year by 2035 (Figure 5.7) and reduce the amount of plastic waste landfilled by 184 tonnes per year by 2035.

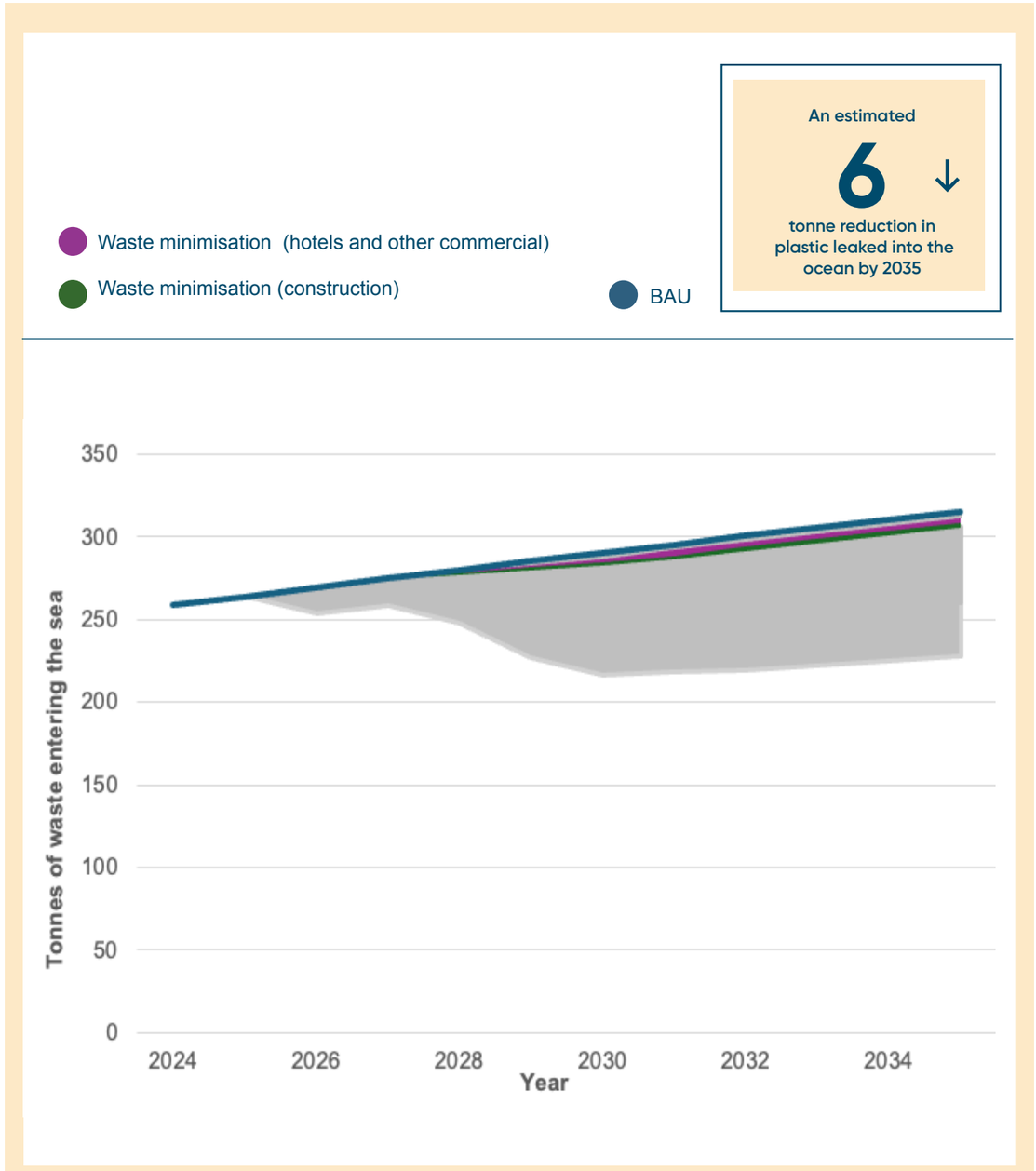


FIGURE 5 7: PLASTIC POLLUTION REDUCTION POTENTIAL OF WASTE MINIMISATION ACTIVITIES IN SAINT LUCIA

Recommendations

Review of existing sectoral guidelines and relevant documentation

Before drafting these waste minimisation guidelines, we recommend undertaking **a comprehensive review of existing sectoral guidelines and relevant documentation.**

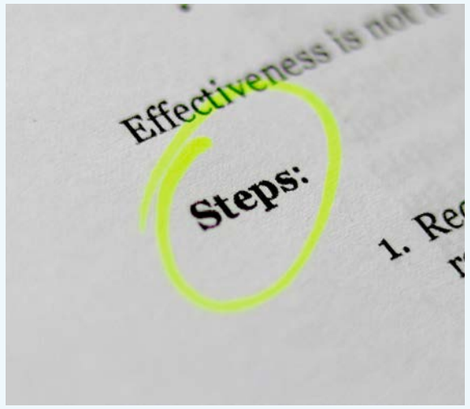
This process will help identify established materials that can serve as foundational resources. Leveraging such existing initiatives will enhance the effectiveness and coherence of the proposed guidelines.

Following the review of existing materials, **drafting the waste minimisation guidelines should be a collaborative and iterative process** involving subject matter experts, key industry stakeholders, and relevant authorities. This inclusive approach will ensure the guidelines are both technically sound and practically applicable across diverse contexts.

Once a preliminary draft has been developed, **it is crucial to initiate a period of public consultation.** Engaging a broad range of stakeholders – including businesses, community organisations, and the public – will provide valuable insights, identify potential gaps or challenges, and foster a sense of shared ownership.

Incorporating feedback from these consultations will not only strengthen the quality and relevance of the guidelines, but also promote greater acceptance and long-term compliance.

It is essential that these guidelines be supported by tailored training and capacity-building initiatives to ensure their effective implementation. Without such efforts, there is a risk that they will remain theoretical guidelines rather than being integrated into everyday practice. Providing stakeholders with the necessary knowledge, skills, and resources will help bridge the gap between policy and action.



Incentives may also be necessary to drive adoption. Incentives such as competitions between hotels, certification schemes, or other enforcement mechanisms can encourage participation, foster innovation, and ensure sustained commitment to waste reduction efforts across these sectors.

Robust monitoring and evaluation mechanisms are equally important to track the implementation of the guidelines. This will help assess progress, identify challenges, and facilitate any necessary adjustments to enhance their effectiveness over time.

The waste minimization guidelines may include several interrelated elements, which are discussed in more detail below.

Construction Sector

Construction waste minimization guidelines can help the sector significantly reduce its environmental impact. These guidelines could emphasize the importance of source separation at construction sites, ensuring that materials such as plastic, wood, metal, and concrete are properly sorted for reuse or recycling, rather than being sent to landfill. Additionally, they could mandate the development of comprehensive waste management plans for every building site, outlining strategies for reducing, reusing, and responsibly disposing of construction waste.

Sustainable procurement policies should also be a key focus, encouraging the selection of eco-friendly and recycled materials to lower the sector's environmental footprint.

Guidelines could further promote the more efficient use of construction materials by advocating for improved planning, precise material ordering, and the adoption of innovative building techniques that reduce excess waste. By integrating these measures, the construction sector can move toward a more circular approach, minimizing waste generation while enhancing resource efficiency.

To support these efforts, the requirement for waste minimisation plans should be formalised as part of the development application process through the Development Control Authority (DCA). Making waste planning a standard component of project approvals would ensure that developers proactively consider waste reduction from the outset, embedding sustainability into the design and construction phases and aligning new developments with national waste management goals.

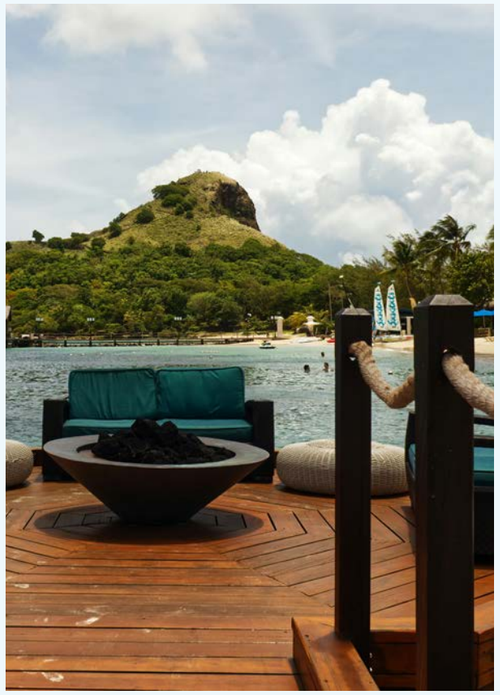
Review of existing sectoral guidelines and relevant documentation

Hotel Sector

Waste minimization guidelines for the hotel sector should focus on practical measures to reduce waste generation and improve resource efficiency. A key priority should be phasing out single-use plastics and small-format packaging, such as individual toiletry bottles, in favour of refillable dispensers to minimize unnecessary waste.

The guidelines should also encourage the widespread adoption of reusable alternatives to disposable items, such as replacing plastic cups with durable glassware or offering reusable dining utensils and linens.

Additionally, the guidelines should promote energy and material efficiency practices, including the installation of water-saving fixtures, energy-efficient appliances, and sustainable waste management systems. By integrating these strategies into standard operational procedures, the hospitality sector can significantly reduce its environmental footprint while fostering long-term sustainability.



Commercial and Institutional Establishments and Manufacturing Operations

For institutions and for businesses in the commerce and manufacturing sectors, waste minimization guidelines should focus on raising awareness and building capacity around resource efficiency and sustainable practices. Training programs and knowledge-sharing initiatives can help businesses identify opportunities to reduce waste while also improving cost efficiency. The guidelines should promote energy and material efficiency measures, such as optimizing production processes, minimizing excess packaging, and incorporating waste-reduction strategies into daily operations.

Additionally, sustainable procurement policies that prioritize environmentally friendly materials and responsible sourcing should be emphasized to support a circular economy. To drive adoption, incentives such as recognition programs, industry benchmarks, or regulatory enforcement mechanisms may be necessary. These measures can encourage businesses to integrate waste minimization into their operations, fostering long-term environmental and economic benefits.

5.7 Reuse schemes

INTRODUCING REUSE SCHEMES FOR THESE ITEMS COULD REDUCE MARINE PLASTIC POLLUTION IN SAINT LUCIA BY EIGHT TONNES PER YEAR AND REDUCE THE AMOUNT OF PLASTIC WASTE LANDFILLED BY

451 TONNES

PER YEAR BY 2035.

Summary

Overview:

Introducing reuse systems for common single-use packaging items in Saint Lucia – specifically beverage and non-beverage bottles, cups and food takeaway containers – would provide a critical first step in reducing dependence on single-use plastics.

A culture of reuse and refill is already partly established; for example, people commonly take reusable bags to the supermarket and also use refillable drinks containers.

Saint Lucia has had some experience and success in terms of implementing reuse for single-use items (e.g. CHEMICO's reuse system and Spice of India pilot).

However, there are some barriers to widespread reuse, particularly for commonly used single-use food and beverage containers. For example, current food hygiene legislation prevents customers from bringing their own containers for filling.

Introducing reuse schemes for these items could reduce marine plastic pollution in Saint Lucia by eight tonnes per year and reduce the amount of plastic waste landfilled by 451 tonnes per year by 2035.

Recommendations:

- Initially, introduce reuse schemes for beverage and non-beverage bottles and for cups and food service containers.
- A comprehensive legislative review should be conducted to identify regulations that hinder the implementation of refill and reuse schemes.
- Pilot systems at scale (e.g. city-wide systems) based on a common format of refillable container to provide ease of use for consumers and to provide economies of scale for the scheme.
- Support the reuse schemes with communication campaigns and incentives.

Overview

This proposed policy relates to Activity 3 under Pillar 2 of the ML-MAP, which calls for the development and implementation of ‘a programme to promote the recovery, recycling and reuse of specific waste streams’.

For the purposes of this report, ‘reuse’ is assumed to include the four main types of reuse and refill as defined by the Ellen MacArthur Foundation, outlined in Figure 58, below.

Small Island Developing States (SIDS) are uniquely positioned to lead in the adoption of reuse systems due to their distinct geographical and socio-economic characteristics. Their relatively small population sizes and contained geographies create natural closed-loop systems, which facilitate the efficient collection, cleaning, and redistribution of reusable packaging.

In addition, the high cost and logistical challenges associated with importing ‘disposable’ single-use plastics make local reuse models not only environmentally necessary, but also more economically advantageous than in larger countries. By capitalizing on these inherent strengths, SIDS can serve as global pioneers in demonstrating the feasibility and benefits of scalable reuse solutions.

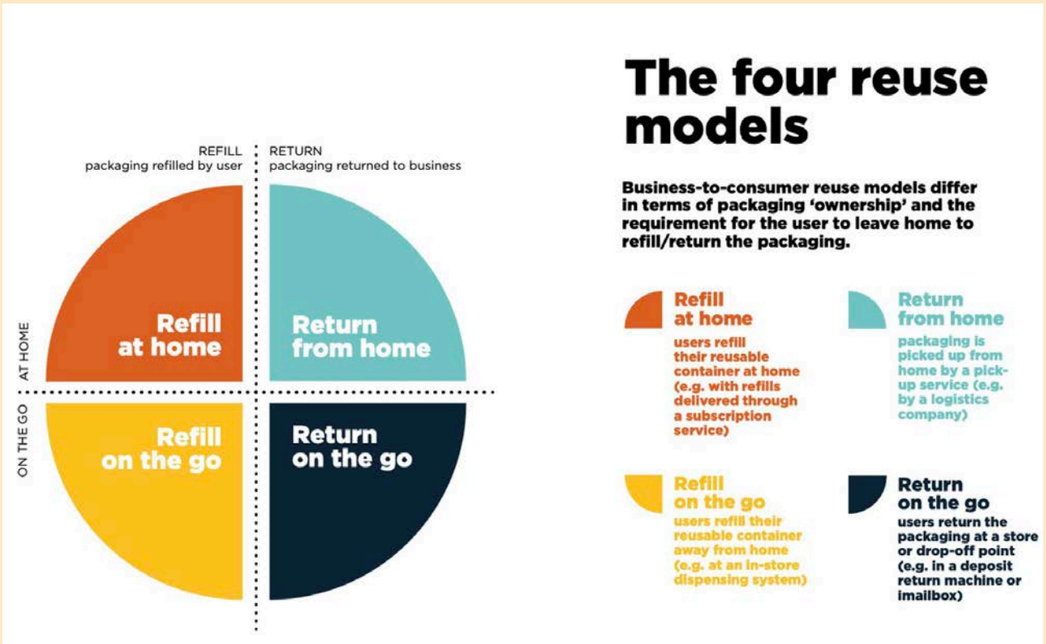


FIGURE 5 8: THE FOUR MODELS OF REUSE (SOURCE: ELLEN MACARTHUR FOUNDATION, 2023)

Assessment

Saint Lucia has already made strides forward in implementing reuse systems to reduce waste and promote sustainability.

The International Union for Conservation of Nature (IUCN) introduced a reuse pilot at the Spice of India restaurant from November 2021 to April 2022 under its Plastic Waste-Free Islands (PWFI) project. This initiative replaced single-use takeaway containers with reusable containers, showcasing practical, scalable alternatives within the food service sector.

Additionally, CHEMICO, a leading manufacturer of domestic and industrial cleaning products in Saint Lucia, has established a reuse system whereby customers can return used bottles to Massy in Cul-De-Sac. These bottles are then collected, cleaned, and refilled by CHEMICO, contributing to a circular approach that supports both environmental and economic resilience. Reusable shopping bags are also readily available at Massy Stores, a leading supermarket chain in Saint Lucia.

To model the potential impact of these reuse systems in Saint Lucia, the proposed reuse schemes are expected to begin implementation in 2028 for beverage and non-beverage bottles, and in 2029 for cups and takeaway food containers.

Full impact is projected by 2031 for the bottle categories and by 2032 for cups and takeaway containers. Once fully established, the schemes aim to reduce the generation of single-use plastic items by 12.5% for beverage bottles and by 35% for non-beverage bottles, cups, and takeaway containers. The reduction potential for beverage bottles is assumed to be lower due to the proposed Deposit Return Scheme, which focuses on promoting recycling.

Under these assumptions, introducing reuse schemes for these items could reduce marine plastic pollution in Saint Lucia by eight tonnes per year by 2035 (Figure 5.9) and reduce the amount of plastic waste sent to landfill by 451 tonnes per year by 2035.

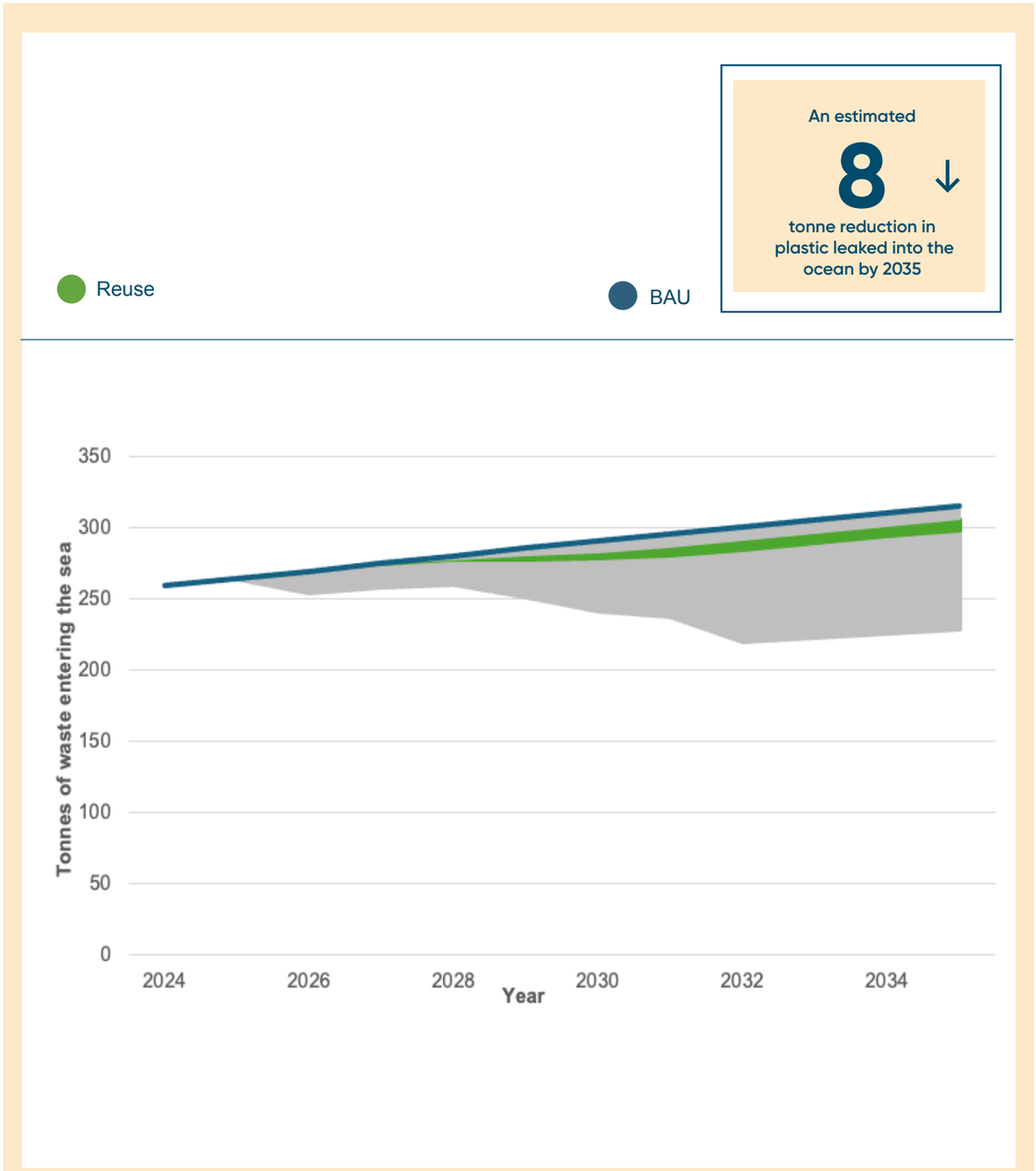


FIGURE 5 9: PLASTIC POLLUTION REDUCTION POTENTIAL OF REUSE ACTIVITIES IN SAINT LUCIA

Recommendations

Introducing reuse systems for common single-use packaging items in Saint Lucia would provide a critical first step in reducing dependence on single-use plastics. Over time, these systems should progressively expand to cover a broader range of products and sectors. This will support the integration of circular economy principles into national waste management frameworks and advance sustainable resource use.

Considering the composition of plastic waste in Saint Lucia, and drawing on best practices from successful global reuse initiatives, we recommend the introduction of reuse systems for:

Beverage bottles

Non-beverage bottles

Cups and food takeaway containers

Each of these is discussed further on the following pages

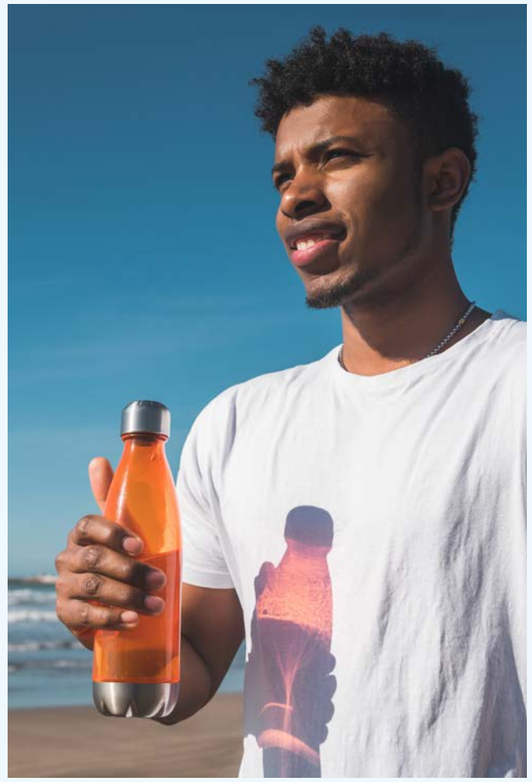
Beverage Bottles

Reuse schemes for beverage bottles often involve bring-your-own-container (BYOC) programs, whereby cafés and other beverage-serving establishments allow customers to bring their own reusable bottles or cups to be refilled. Establishments can also offer these reusable containers for sale, creating an additional source of revenue. Customers who participate in these programs are often incentivized with discounts to encourage the use of reusable containers. This initiative promotes sustainability by reducing single-use waste, and also offers participating businesses the opportunity to reduce the costs associated with disposable or single-use cups.

In Saint Lucia, however, bring-your-own-container programs are currently in conflict with the Public Health and Safety Regulation (Chapter 9, 316/29), which prohibits the handling of consumer-owned containers in food establishments.

To resolve this, a comprehensive legislative review should be conducted to identify regulations that hinder the implementation of refill and reuse schemes. This review would aim to remove unnecessary regulatory barriers and develop the necessary regulations and codes to facilitate refill and reuse programs in Saint Lucia, while ensuring compliance with stringent health and safety standards. A similar review process was recently undertaken by the Food and Drug Administration (FDA) in the United States, as highlighted in the case study below.

Beyond cafés, enabling bring-your-own-container initiatives could also be extended to coconut water vendors, who are prevalent along the island's roadsides and currently serve the beverage in single-use plastic bottles. By transitioning to dispensers, these vendors could significantly reduce their use of single-use plastic bottles, aligning with Saint Lucia's broader waste reduction and environmental conservation goals.



Case Study

U.S. Food and Drug Administration (FDA) Supplement the Federal Food Code to enable Reuse

In November 2024, the US Food and Drug Administration (FDA) took a significant step towards sustainability and waste reduction by supplementing the Federal Food Code to permit the use of reusable foodware in various food service establishments.

This revision allowed businesses, third-party services, and consumers to use reusable containers, provided they adhered to strict health and safety guidelines. Previously, concerns about contamination and cross-contact prevented the widespread acceptance of reusable foodware in the commercial food industry in the United States.

Development Process:

Recognising the potential benefits of reusable foodware while prioritizing consumer safety, the FDA initiated a multi-stakeholder collaboration to study the feasibility of this change.
The process involved establishing the Safe Use of Reusables Committee, composed of representatives from the FDA, public health officials, environmental organizations, food service industry leaders, and consumer advocacy groups. This committee conducted extensive research, reviewed existing food safety studies, and analysed best practices from international models where reusable foodware systems have been successfully implemented.

Key considerations in the development process included:

- **Sanitation and public health protocols:** ensuring that reusable containers could be properly cleaned and sanitized to prevent foodborne illness and contamination,
- **Operational feasibility for businesses:** assessing how restaurants, grocery stores, and foodservice providers could integrate safe handling of reusable containers into their workflows,
- **Regulatory alignment:** updating guidelines in alignment with the FDA's food safety standards while allowing flexibility for state and local health departments to adopt and enforce the changes effectively,
- **Consumer education and adoption:** implementing public awareness campaigns to inform consumers about safe practices for using and returning reusable containers.

Implementation and Guidelines:

Following the committee's recommendations, the FDA introduced specific guidelines outlining:

- **Cleaning and sanitisation standards:** establishing protocols for businesses to properly clean and store reusable containers, ensuring they meet stringent sanitation requirements before reuse,
- **Third-party service regulations:** allowing certified third-party companies to manage reusable foodware systems, ensuring compliance with health standards,
- **Consumer responsibilities:** providing clear instructions for consumers on how to safely maintain and return reusable containers, including designated drop-off locations and participation in verified reuse programs.

Non-Beverage Bottles

In Saint Lucia, the introduction of a parallel reuse Deposit Return Scheme (DRS) for non-beverage bottles, such as cleaning product bottles, could provide an effective means of reducing plastic waste, complementing the single-use DRS for beverage containers outlined in the Management of Beverage Containers Bill. While the single-use system focuses on recycling, the reuse DRS would emphasize the reuse of cleaning product bottles, fostering a circular economy.

By offering incentives for non-beverage bottle returns, such as monetary compensation provided by the cleaning supply companies, this parallel system could support sustainable practices and contribute to the reduction of single-use plastics in the island's waste stream.

Notably, CHEMICO, a leading manufacturer of domestic and industrial cleaning products in Saint Lucia, has already implemented a return incentive program, offering financial rewards to customers who return their used bottles to the Cul-De-Sac branch of Massy, a major retailer in Saint Lucia. Allowing consumers to return these reusable bottles to a selection of redemption depots, as opposed to a single Massy branch, would improve convenience while streamlining collection efforts for CHEMICO.

This approach would ultimately enhance the efficiency and scalability of their reuse system, supporting a more effective circular economy model. This reuse model could be expanded across all local manufacturers in the sector, promoting sustainability on a broader scale.

Cups and food takeaway containers

There are several potential approaches to implementing a reuse scheme for cups and food takeaway containers.

To determine the most effective delivery methods and underlying business models, a pilot project will be essential – however, it is important that this is done at scale. This will facilitate the testing of different approaches, data collection on feasibility, operational efficiency, and consumer engagement.

In the short term, efforts should focus on both piloting these reuse systems and increasing public awareness regarding the environmental benefits of reducing single-use plastics, while also ensuring widespread awareness of the health and safety standards governing reuse schemes.

The IUCN's reusable food takeaway container pilot in Saint Lucia at the Spice of India restaurant (from November 2021 to April 2022) identified hygiene and safety concerns as key barriers to customer participation. To address these challenges, staff training will be critical in reassuring customers, supported by a comprehensive public education campaign to emphasize the rigorous hygiene and safety standards embedded within the system.

One viable approach to further mitigate hygiene concerns is the establishment of centralized, third-party washing facilities. Given the significant role of tourism in Saint Lucia's economy, leveraging hotel infrastructure as washing hubs for reusable containers could enable the integration of reuse systems within the existing hospitality sector.

Adopting such an approach could provide a scalable and locally appropriate solution to advancing sustainable food packaging practices, while ensuring strong hygiene and food safety standards.

To maximize the effectiveness of the pilot initiative, it is essential to expand its scope beyond a single restaurant, engaging a broader network of food service operators.

A city-wide pilot for reusable food takeaway containers, encompassing all restaurants in key areas such as Rodney Bay or Castries, would facilitate economies of scale while enhancing accessibility through multiple container drop-off points. This approach would enable a seamless 'buy anywhere, return anywhere' system, fostering user convenience and increasing participation. This approach to achieving scale is also essential for reusable cup systems to be effective.

Rather than being limited to individual vendors, such systems should be implemented collectively—for example, across all vendors at the Saint Lucia Jazz and Arts Festival or all carnival bands during the Saint Lucia Carnival - to maximise convenience and economies of scale.

Given that reuse systems must compete with a long-established and highly optimized single-use model – one that has benefited from decades of subsidies and normalisation – it is imperative that reuse solutions replicate the efficiency and ease of single-use systems as closely as possible.

Any system that lacks sufficient scale, with limited participating outlets and return locations, is unlikely to achieve widespread adoption. Indeed, the challenges faced by many small-scale reuse pilots highlight the difficulties of incremental expansion. To overcome these barriers, reuse initiatives should be designed for large-scale implementation from the outset, enhancing their viability and long-term success.

Incentive mechanisms – such as offering discounts to customers who choose reusable containers – will encourage initial adoption.

In the short term, this approach is expected to be economically viable, as participating businesses will experience cost savings by reducing their reliance on single-use packaging.

Over time, reusable food containers should become the default option, with single-use alternatives being available only upon request. This gradual transition will help normalize reuse practices, fostering a long-term shift towards more sustainable consumption patterns and reducing overall waste generation.

Global evidence from reuse systems indicates that achieving price parity with single-use systems is challenging. This is due to upfront investment costs, operational and logistical expenses for collection and cleaning technology, and market disadvantages – including fossil fuel subsidies that artificially lower the cost of virgin plastic production.

Accordingly, the initial investment required for infrastructure, marketing, and business engagement – along with other transition costs – requires grant funding.

To support the effective implementation of this policy, policymakers should explore a range of financing mechanisms. Potential approaches include the provision of grants, securing corporate sponsorships, or establishing a challenge fund, whereby businesses and initiatives compete for financial support.

Such funding could be sourced from levies on plastic packaging (see Section 5.2.4) and plastic bags (see Section 5.9.1). These strategies would help ensure a sustainable financial framework while incentivizing innovative solutions to reduce single-use plastics.

Supportive Policies

Achieving the necessary scale, innovation, and collaboration for a successful transition to reuse systems requires a strong and supportive legislative framework. While there is no universal solution and best practices continue to evolve, several key policy components can facilitate this transition:

- **Establishing targets:** setting mandatory, sector-specific and product-specific targets for reuse and refill is essential. These targets should be both ambitious and progressively challenging to drive systemic change. Higher targets can help ensure that the reuse market reaches the necessary scale for economic viability.
- **Balanced policy approaches:** a combination of incentive-based (“carrot”) and regulatory (“stick”) measures will encourage behaviour change. Incentives, such as consumer discounts or tax benefits for businesses adopting reuse models, can drive participation, while regulations – such as bans, levies on single-use items, or mandatory reuse quotas – can further accelerate the transition.
- **Leveraging Extended Producer Responsibility (EPR):** while not currently enacted in Saint Lucia, EPR schemes can play a crucial role in funding and scaling reuse systems. For example, in France, 5% of EPR contributions from producers (amounting to approximately €50 million per year) is allocated to financing reuse initiatives. This provides critical financial support for infrastructure development and operational costs. Implementing similar mechanisms can help ensure sustained investment in reuse models.

By integrating these elements into legislation, governments can create an enabling environment for reuse systems, fostering long-term sustainability and reducing dependence on single-use plastics.

Case Study

Reusable cups at Swanage Carnival

Swanage Carnival is an eight-day family event that takes place every year at a sea-side town in the UK. The event uses reusable cups instead of single-use options to abide by the council’s environmental policy, which seeks to reduce single-use plastic in its coastal location.

The event hires approximately 30,000 reusable cups from StackCup, a provider of reusable cups for major events. 20,000 of these cups are delivered at the beginning of the carnival, and halfway through the week the used cups are collected for off-site washing and a fresh supply is delivered.

Customers are charged a £1 deposit when they buy their first drink and get a fresh cup with every new drink at no additional cost, if they return their used cup to the bar (City to Sea, n.d.).

Carnival Chairperson Maria Foot said, “**The introduction of reusable cups to our event was a huge success, massively reducing the waste accumulated at our event.”**

5.8 Waste Management Plan for the fisheries sector

THE INTRODUCTION OF A WASTE MANAGEMENT PLAN FOR THE FISHERIES SECTOR COULD REDUCE MARINE PLASTIC POLLUTION BY

3 TONNES

PER YEAR BY 2035

Summary

Overview:

There is very limited data on the quantity and nature of fishing gear used and lost at sea in Saint Lucia,

To date, there has been no coordinated approach to addressing this issue in Saint Lucia,

However, the loss and abandonment of fishing gear in Saint Lucian waters poses a risk to this key local industry,

Recommendations:

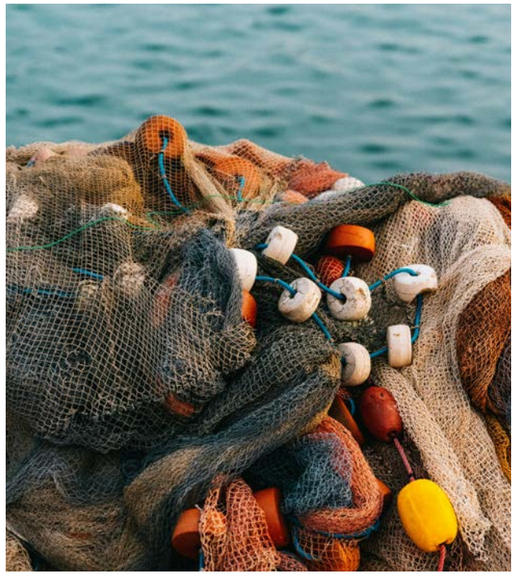
- Initiate stakeholder mapping and engagement to collect better information and raise awareness of the issue,
- Launch an education campaign to build capacity, followed by training and education sessions to help improve practice,
- Establish a waste records database to provide better data in the long term on fishing gear usage and loss rates,
- Once a better understanding of the issue has been obtained and awareness raised, consider a range of measures to tackle the problem, including:
    - Track and trace systems for lost gear
    - Providing additional disposal points
    - If appropriate, incorporate amendments into the planned revision of the Fisheries Act to cover the issue of lost gear

Overview

Research undertaken in 2016 estimated that by 2050, there could be more plastic in the ocean than fish by weight (WEF, 2016). This underlines the need to engage the fishing sector in plastic pollution discussions to protect and secure the sustainability of their livelihoods, as well as the ocean environment.

The development of a waste management plan for the fisheries sector is an adaptable approach that may include several interrelated elements, as discussed in detail below. It will be important to implement effective monitoring and evaluation of the plan's implementation, to enable reactive changes and improvements to be made.

> **Engage the fishing sector in plastic pollution discussions to protect and secure the sustainability of their livelihoods, as well as the ocean environment.**



Assessment

Due to limited data on the quantity and types of fishing gear used and lost at sea in Saint Lucia, the figures used in the modelling have been extrapolated from similar Caribbean contexts where such data is available.

Globally, data on lost and abandoned fishing gear tend to be sparse and inconsistent. Nevertheless, evidence from recent beach clean-ups in Saint Lucia – specifically, the International Coastal Cleanup's 2024 data – shows the presence of fishing gear, including nets, ropes, and floats/buoys. This policy emphasises the need to establish a baseline that draws on additional data collection.

Previous efforts to retrieve discarded fishing gear in Saint Lucia have included pilot track and trace initiatives and underwater clean-ups conducted in collaboration with diving companies. This policy builds upon, and expands, these earlier initiatives.

The introduction of a waste management plan for the fisheries sector, to include the return of damaged fishing gear, is based on several key assumptions. The policy is anticipated to be implemented in 2029, with its full impact expected by 2030. The policy should achieve an estimated 35% reduction in plastic leakage into the sea from the sector. Under these assumptions, the policy could reduce marine plastic pollution by three tonnes per year by 2035 (Figure 5.10).

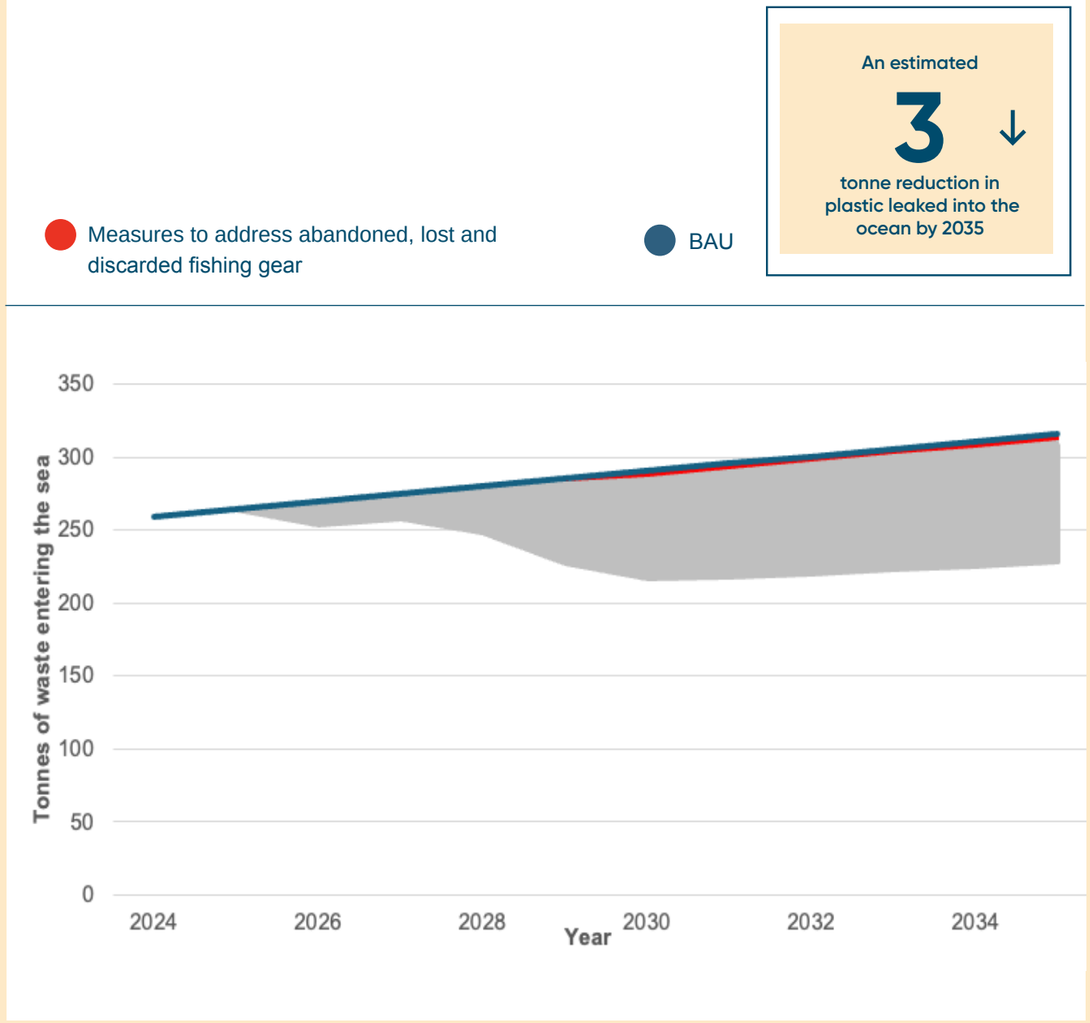


FIGURE 5 10: PLASTIC POLLUTION REDUCTION POTENTIAL OF A FISHERIES SECTOR WASTE MANAGEMENT PLAN IN SAINT LUCIA

Recommendations

Phase 1: Data collection.

The first phase will focus on mapping, identifying and then engaging stakeholders to gather information, as this is a sector with incomplete data and uncertainty regarding the estimates used.

Stakeholder mapping and engagement:

- Identify the main stakeholders, starting with the Ministry of Fisheries. Multi-stakeholder participation is vital to design and develop fit-for-purpose solutions.
- Gain a detailed understanding of current practices and projects and identify issues through stakeholder consultation, including causes of gear loss.
- Identify sources of plastic pollution (and other waste items) across the sector and associated supply chain, e.g. which types of fishing gear, foam buoys, and product packaging.
- Gauge support for capacity building and the required focus of this.

Capacity building:

- Develop an education campaign to raise awareness among relevant stakeholders about the need to reduce plastic waste and harness support for a waste management plan. Communication materials may need to be tailored to the audience to ensure easy understanding.
- Deliver training and education sessions. For example:
  - technological approaches to data collection
  - retrieval best practice, including techniques to dismantle ‘ghost gear’
  - gear marking techniques and technologies
  - existing and proposed legal provisions for solid waste management in general, and plastic waste in particular

Waste records/database:

- Mainstream plastic pollution (and SDG 14 targets) into the Department of Fisheries work program activities to monitor and collect data. For example, there is the potential to capture Abandoned, Lost and Discarded Fishing Gear (ALDFG) data during the licensing period by including additional questions on the quantities and types of plastic fishing gear used and lost.
- Develop a baseline of how much waste is being generated (and lost) by fishing vessels. Divers have previously retrieved discarded fishing gear and run underwater clean-ups. This has become a relatively common approach (PADI, 2022), which could be reinstated in Saint Lucia.
  - This may involve collaborating with dive/snorkel operators to develop mechanisms to record baseline data, and monitoring data. This process could be incentivised to encourage uptake. It could form part of an offer for eco-tourism (e.g. Responsible Travel website) and for local active diving groups.
  - Support the transition to capturing data in a digital format.

Phase 2: Project implementation.

The nature of the projects will be defined and developed through Phase 1. Suitable funding opportunities will need to be identified. Project examples include:

Track and trace systems

These require fishing gear to be marked with the details of the vessel in which it will be deployed, with solutions ranging from low-tech engraving to high-tech sensors and electronic tags.

A scoping study would initially review any past pilot projects which may have been done, either in Saint Lucia or within the wider Caribbean region, to establish what has been done already and what lessons were learned.

A pilot project could then be run, alongside effective monitoring and evaluation, to ensure lessons learned are captured and shared. This would then lead to the implementation of a tracking and monitoring system to address ALDFG.

Additional waste disposal points

Placed near harbours and key fishing areas, these will discourage the dumping of waste at sea. All vessels may be charged a flat waste management and disposal fee, regardless of the amount of waste offloaded. With a regular supply of material, it may be possible to explore options for recycling (for nets in particular) in the future.

This approach will have to be supported through stakeholder engagement to ensure the widespread commitment of vessel owners not to discharge (plastic) waste into the sea, but to bring it ashore for transfer to waste disposal points.

Phase 3: Amend legislation

The revised draft Fisheries Act is due to be updated, and relevant amendments could address discarded fishing gear. For example, following a successful pilot, amendments may include provisions to legislate for a track and trace approach. Stakeholder feedback recognised that enforcement is critical to ensure the effectiveness of this approach and, therefore, legislation would be required.

5.9 Review of other policies and instruments

In addition to the policies outlined in the ML-MAP, the DSD requested a review of two other bills that have been proposed for Saint Lucia: the Marine Pollution Management Bill and the Draft Plastic Pollution Control Bill.

These bills are integral to the broader legislative framework aimed at addressing environmental challenges, particularly those related to marine pollution and plastic waste management within the region.

Marine Pollution Management Bill

Overview

The main purpose of this Bill is to provide for the state's powers and jurisdiction in relation to the prevention of marine pollution and other related issues. It seeks to do this through the adoption of several international marine pollution conventions; for example, the prevention of marine pollution under the International Convention for the Prevention of Pollution from Ships (1973), as amended by the Protocol of 1978 (MARPOL 73/78).

The component of most relevance to plastic pollution is Chapter 6 - Prevention of Pollution by Garbage. This makes provision for the administration's powers and obligations with regard to marine pollution caused by garbage under Annex V of MARPOL 73/78.

As an international convention, it applies to international vessels, but the act also makes provision for the Minister to make regulations and appropriate measures for vessels not covered by the conventions, including vessels operating only in local trade.

Assessment

Chapter 6 includes other relevant provisions, specifically:

- Prohibiting the disposal into the sea of all plastics, including but not limited to synthetic ropes, synthetic fishing nets and plastic garbage bags.
- Every Saint Lucian ship shall, before entering the Antarctic area, have sufficient capacity on board for the retention of all garbage while operating in the area and have concluded arrangements to discharge such garbage at a reception facility after leaving the area.
- There shall be adequate and accessible garbage reception facilities provided, in accordance with the regulations made pursuant to section 169.
- Every ship of 400 gross tonnage and above, and every ship which is certified to carry 15 persons or more, shall carry a garbage management plan, which the crew shall follow.
- Where any ship, or the owner or master thereof, fails to comply with any requirement of this Chapter, the owner and the master of the ship is each guilty of an offence and liable on summary conviction for a fine of up to $250,000 EC.

Recommendations

The Act includes provision for enforcement. However, for it to be effective, it will be essential that an appropriate agency is empowered to conduct sufficient enforcement to ensure compliance by marine vessels entering Saint Lucian waters.

Draft Plastic Pollution Control Bill

Overview

This draft model legislation was prepared under the GEF Islands Caribbean programme. It sets out model legislation for eWaste, end-of-life vehicle management, mercury-added products, and the control of plastic pollution.

We have conducted an initial review of the draft Control of Plastic Pollution regulations to identify any key issues as they relate to the existing or proposed policies on this issue in Saint Lucia. The model legislation provides an overarching framework for ending plastic pollution, based on measures to prevent, reduce and eliminate plastic waste.

It introduces several key concepts, including:

- the need to transition to a circular economy
- the importance of information sharing and education to promote public awareness
- the role of Extended Producer Responsibility (EPR)
- the need for a National Action Plan, and
- the requirement for funding to support the administration and enforcement of the legislation.

The draft model legislation also highlights the need to prevent the use of oxo-degradable plastics – plastics containing additives that accelerate their breakdown into smaller fragments – as they contribute to microplastic pollution as they degrade.

The draft specifically excludes beverage containers governed by the Beverage Containers Act and does not apply to products manufactured for export. The main components outlined are discussed below.

Assessment

The draft legislation sets out measures for administering the legislation, including designating an agency to enforce the legislation, defining funding arrangements, and promoting information-sharing and inter-agency cooperation. It also identifies the need for a National Action Plan, which should set out a series of strategic actions along with associated measurable targets.

It goes on to outline several main components:

- **Overarching provisions for establishing an Extended Producer Responsibility (EPR) scheme,** whereby producers and importers of plastic products would be responsible for ensuring the recovery and disposal of plastic waste at end of life. Where public authorities undertake plastic waste management, it sets out a requirement for producers to provide proportionate funding for those operations.

  These requirements are set out in outline. The detailed mechanisms for establishing EPR are not defined in the draft legislation.

- **Control measures which would apply to specific groups of plastic products.** It sets out provisions to prohibit specific single-use foodware (Schedule 1 of the draft) and also plastic bags.

  Schedule 2 sets out exemptions to these bans, allowing certain products to be manufactured or imported with a license. Examples of exemptions include single-use plastic bags used for medical and veterinary purposes or bags used to store fresh produce, trays used for chilled and frozen meat products and drinking straws used by disabled people.

  The control measures component of the draft identifies very similar products to those banned under Saint Lucia's Styrofoam and Plastic Food Service Containers (Prohibition) Act, 2019 (see Table 11 below).

- **Measures for managing plastic wastes,** including identifying the need for raising awareness – such as raising public awareness of reusable alternatives and reuse systems, and the impact of littering and inappropriate disposal. It provides an overarching framework for implementing different measures to reduce the consumption of single-use products, including promoting reusable products, introducing economic incentives and instruments, and restricting products.

  It also sets out provisions for labelling products clearly to aid end-of-life management, and establishing the separate collection of plastic waste for recycling through, for example, DRS or EPR.

- **Finally, the legislation sets out provisions for enforcing the legislation,** including requirements for producers to maintain records, establishing a framework for sanctions and fines, and a requirement for the enforcing agency to appoint officers to inspect and enforce the law

TABLE 11: SUMMARY OF ITEMS PROHIBITED BY DRAFT MODEL LEGISLATION AND SAINT LUCIA'S STYROFOAM AND PLASTIC FOOD SERVICE CONTAINERS (PROHIBITION) ACT, 2019

Draft Model Legislation Schedule 1 - Prohibited single-use plastic items	Styrofoam and Plastic Food Service Containers (Prohibition) Act, 2019	
	Part A - Styrofoam products prohibited	Part B - PET, HDPE, PS products prohibited
1. Egg boxes 2. Food service products; namely lids, caps, stoppers and other closures 3. Cups 4. Drinking straws 5. Forks 6. Knives 7. Plates 8. Spoons 9. Stirrers	• Disposable cup • Disposable plate • Disposable tray • Disposable hinged takeaway container • Disposable bowl • Disposable egg carton	• Disposable cup • Disposable plate • Disposable beverage cup lid • Disposable bowl lid • Disposable fork • Disposable spoon • Disposable knife • Disposable straw • Disposable hinged takeaway container • Disposable bowl • Disposable tray • Disposable stirrer

Recommendations

The draft model legislation establishes several core principles for addressing plastic waste, offering a foundational framework for the development of specific measures aimed at preventing, reducing, and managing plastic pollution.

Among its key features are:

- Extended Producer Responsibility (EPR)
- bans on problematic products, and
- awareness-raising.

Each of these is supported by the designation of a lead agency empowered to implement and enforce these provisions.

Critically, while the draft legislation does not delve into detailed implementation mechanisms, it introduces strategic directions such as requiring the designated agency to promote the manufacture or import of reusable products.

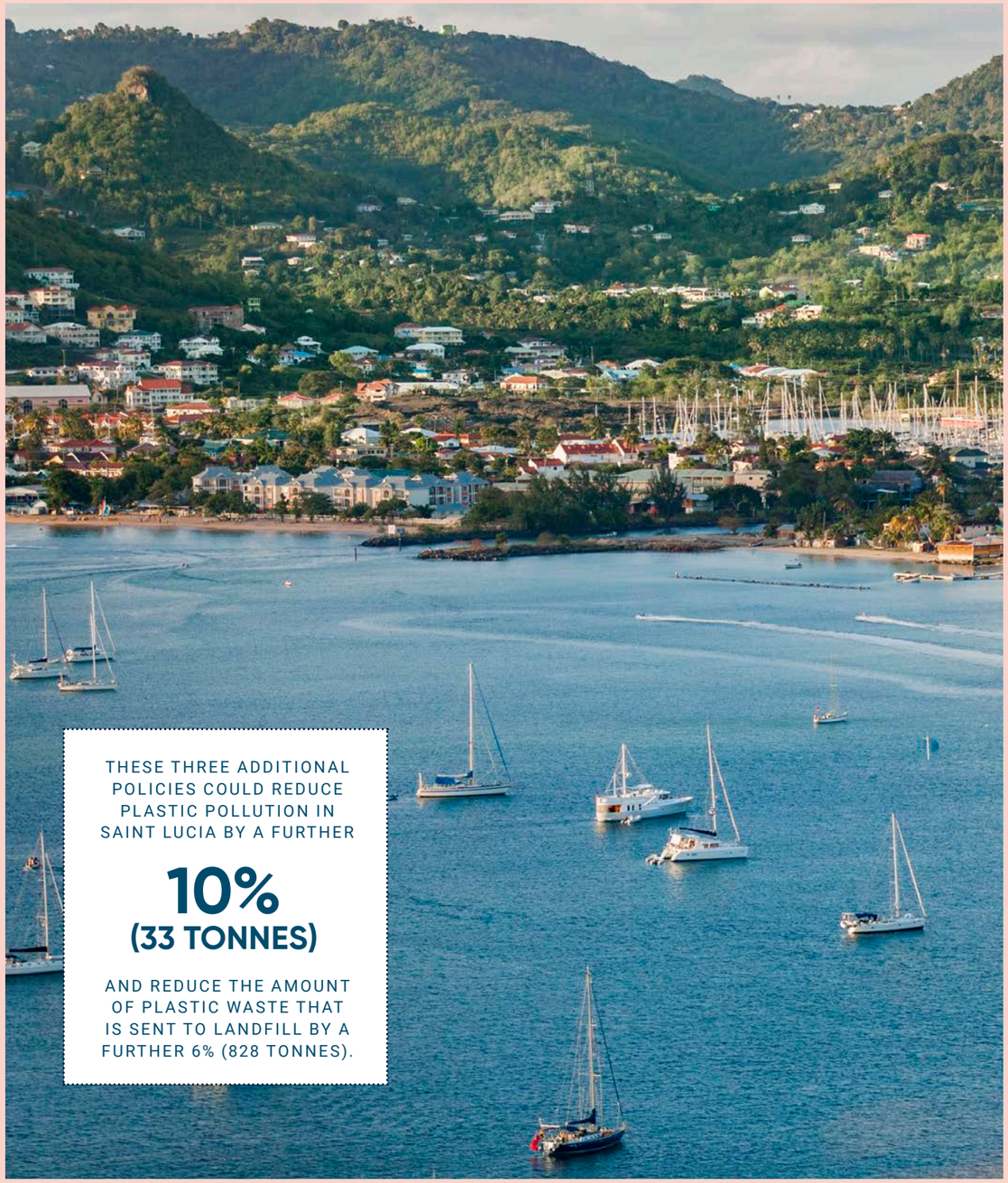
This positions the draft legislation as an important reference point – particularly because it articulates systemic principles, like EPR, that are currently missing from the ML-MAP.

Given this, Pillar 1, Activity 1 of the ML-MAP should explicitly build on the framework provided by the draft legislation. Incorporating its principles – especially EPR – would strengthen the action plan's alignment with the global policy direction and promote more comprehensive and long-term solutions to plastic pollution.

Given the complexity of EPR, it is recommended that this be considered a medium-term objective to allow sufficient time to conduct stakeholder consultation and value chain engagement and potentially coordinate a regional approach.

It will also be important to consider carefully how the key elements of the draft legislation can be used to complement, rather than duplicate, existing legislation in Saint Lucia. For example, the prohibitions detailed in the draft legislation are similar to Saint Lucia's existing Styrofoam and Plastic Food Service Containers (Prohibition) Act, 2019, as highlighted in Table 11 above.

5.10 Other policies for consideration



The combined impact of the policies outlined above, in Sections 5.2 to 5.7, could reduce plastic pollution in Saint Lucia by 28% by 2035. Clearly, a more ambitious reduction will require additional action.

In addition to the policies outlined in the ML-MAP, Common Seas proposes an additional three policies for consideration, namely:

1. a reusable diaper campaign
2. waste minimisation guidelines at the household level,
3. a plastic bag levy

Together, they could reduce plastic pollution in Saint Lucia by a further 10% (33 tonnes) (Figure 511) and reduce the amount of plastic waste that is sent to landfill by a further 6% (828 tonnes).

When implemented alongside the ML-MAP policies, they could collectively achieve a 38% reduction in marine plastic pollution in Saint Lucia by 2035 and a 40% reduction in the amount of plastic sent to landfill per year by 2035.

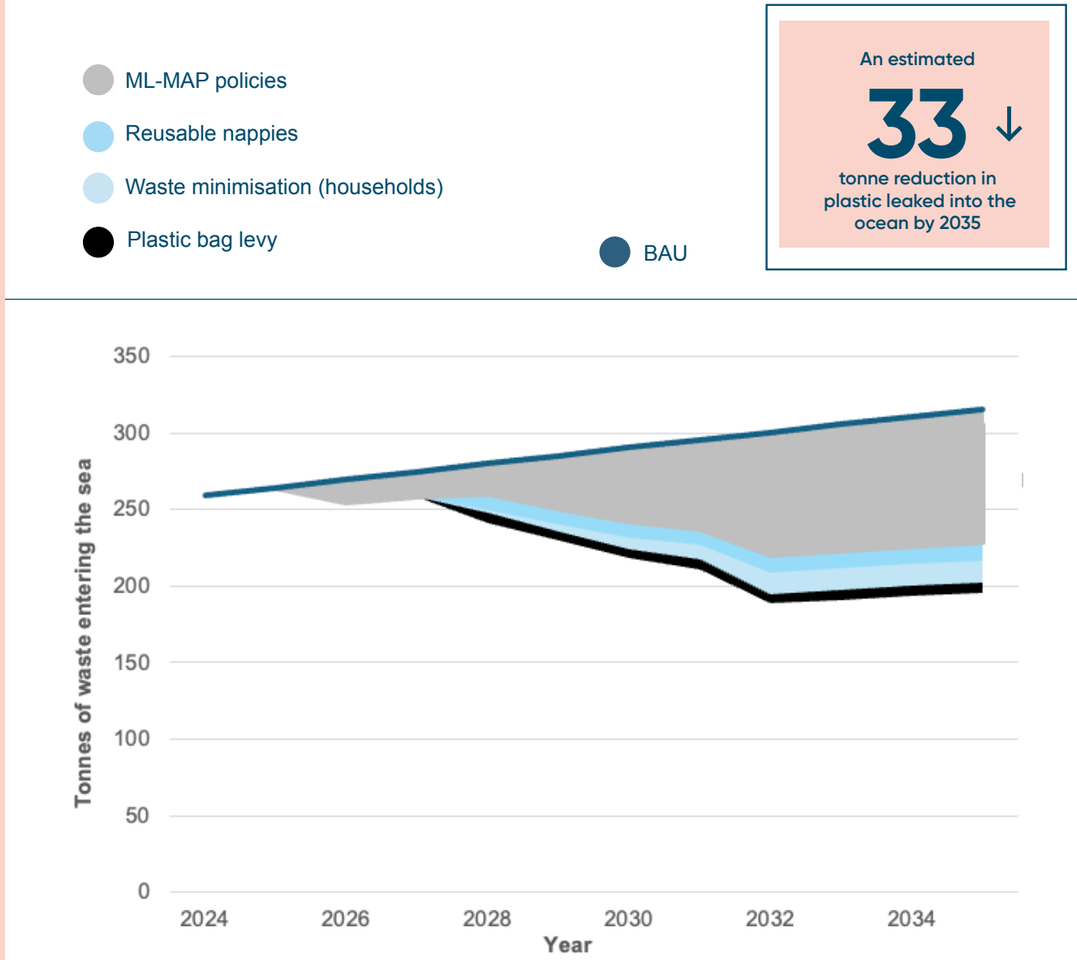


FIGURE 5 11. MARINE PLASTIC POLLUTION REDUCTION POTENTIAL OF THE THREE ADDITIONAL POLICIES FOR CONSIDERATION

Plastic bag levy

Overview

Single-use plastic bags have been identified as the fifth most common contributor to plastic pollution in Saint Lucia, following beverage and non-beverage bottles, diapers, and wet wipes.

Saint Lucia's largest supermarket chain, Massy stores, has already introduced a 25-cent XCD charge per bag. Revenue from this levy goes to its Environmental Fund, which supports a range of environmental and social initiatives throughout the country. Reports indicate that the charge has not significantly discouraged the use of SUP bags in their stores, however, as consumers often repurpose them as a more affordable alternative to garbage bags.

Massy and several other retailers have also reportedly transitioned to biodegradable bags. However, biodegradable plastics require specific conditions to break down. These conditions are typically found only in industrial composting facilities, which are not available in Saint Lucia.

Furthermore, there is no universally accepted international standard for biodegradability, making it difficult to determine the composition of these bags and appropriate disposal methods. As a result, they are likely to end up in landfills or as litter, where they are unlikely to biodegrade.

Assessment

To estimate the potential impact of the policy, we have assumed that the levy would be introduced in 2029, reaching full effect by 2030. Under this scenario, carrier bag usage is expected to decline by 90%, while the use of all other plastic bags is estimated to decrease by 45% . Under these assumptions, reducing single-use plastic bags by implementing a levy could reduce marine plastic pollution in Saint Lucia by six tonnes per year by 2035 (Figure 5.12) and reduce the amount of plastic waste sent to landfill by 233 tonnes per year by 2035.

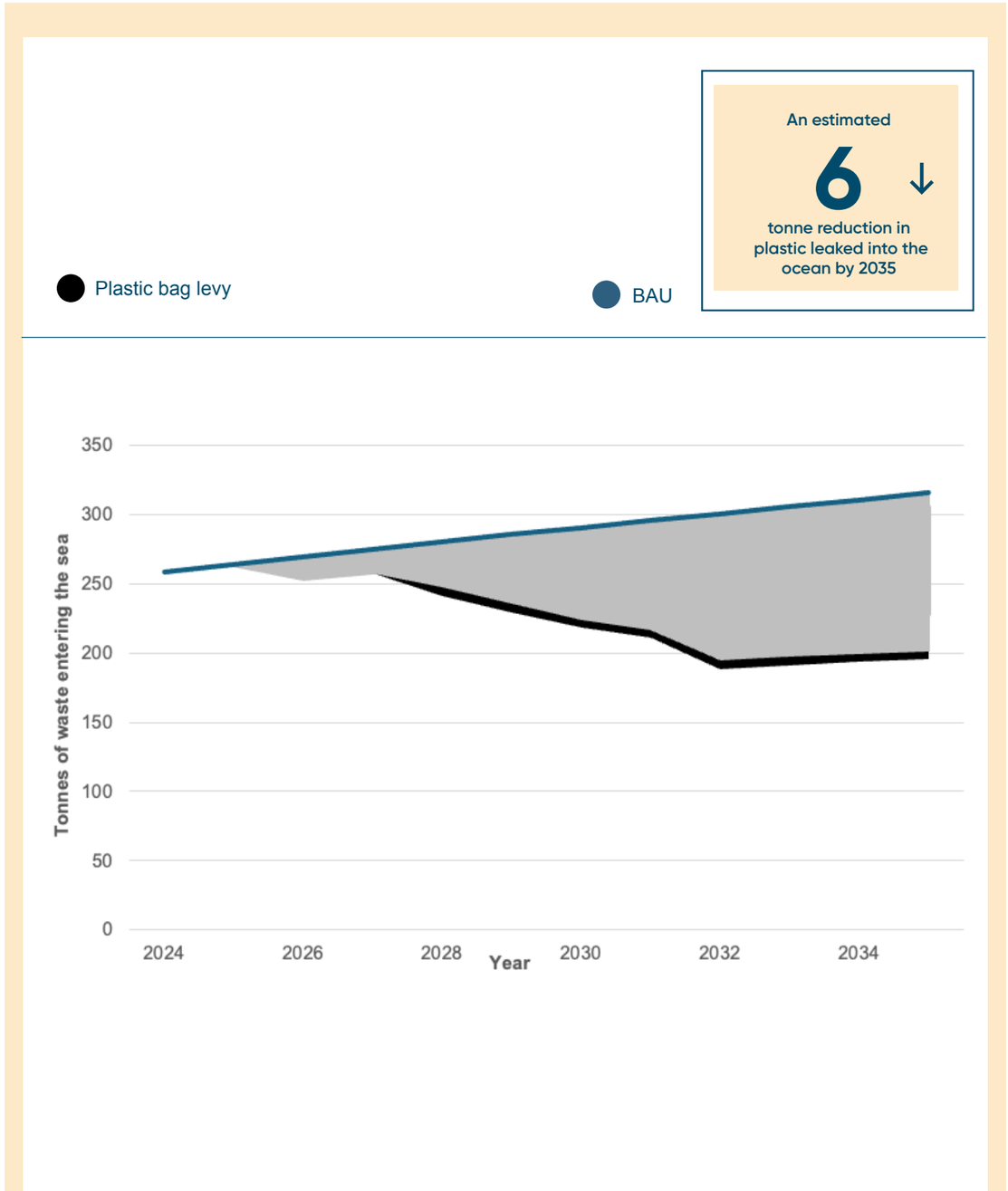


FIGURE 5 12: PLASTIC POLLUTION REDUCTION POTENTIAL OF A PLASTIC BAG LEVY IN SAINT LUCIA

Recommendations

A charge should be applied to all single-use plastic bags, including those labelled as biodegradable, to prevent a shift toward alternative options that may also pose an environmental risk.

The charge is intended to discourage excessive consumption, while ensuring that such bags remain accessible for necessary uses, such as waste disposal – a common concern raised during the in-person workshop in February 2025.

A technical working group should be established to guide the policy's design and scope, addressing key considerations such as:

- The definition of a single-use bag
- The classification of biodegradable bags – whether they are subject to the fee, the standards they must meet to be labelled as biodegradable, and their intended end-of-life disposal
- Whether the fee should also be extended to paper bags (to encourage the use of reusable vs. single-use bags)
- The availability of alternatives to single-use plastic bags in Saint Lucia and the necessary measures to enhance access, particularly for disadvantaged groups
- The appropriate level of the charge to ensure effectiveness in reducing plastic bag usage.

The charge should be set at a level sufficient to encourage consumers to switch to reusable alternatives, fostering the development of circular business models.

Consumers will be responsible for paying the charge, which must be clearly displayed as an additional cost, separate from the product's original price. This transparency will help ensure consumer awareness and prevent potential backlash against retailers.

An impact assessment should consider the costs and benefits of the charge. This should include whether any groups of stakeholders would be disproportionately and adversely affected and potential mitigations to help alleviate the impact on these groups. For example, low-income households could be identified and provided with reusable bags ahead of the charge coming into effect.

A dedicated fund will manage the revenue generated from the charge. This fund could, amongst other things, be used to provide financial incentives to encourage recycling (see Section 5.4) and assist businesses in transitioning to reusable alternatives (see Section 5.6). It is essential to determine which organization will oversee the fund, with the Department of Sustainable Development being a likely candidate to act as the Fund Manager. This will help ensure that the funds are allocated effectively and transparently to maximize their environmental impact.

Conduct a national public consultation on the detailed policy proposal, providing an opportunity to present research findings and inform the public – for example, about the limited degradability of biodegradable bags in natural environments – and for the public to express any concerns regarding the proposal.

Once the policy is finalized, **businesses should be clearly informed about reporting structures and requirements. Regular monitoring (e.g. annually) should track the impact of the charge,** assessing its effectiveness in reducing the use of single-use plastic (SUP) bags and identifying any unintended consequences. Additionally, technical assistance and training will be required for enforcement authorities, including the DSD and Customs, as well as ensuring there is sufficient enforcement capacity.

The policy should follow a phased implementation, with charges increasing at predetermined intervals (e.g. every 5 years) to sustain reductions in usage. Evaluation of existing data from Massy Stores would provide useful insights into the effectiveness of the 25 cent XCD charge

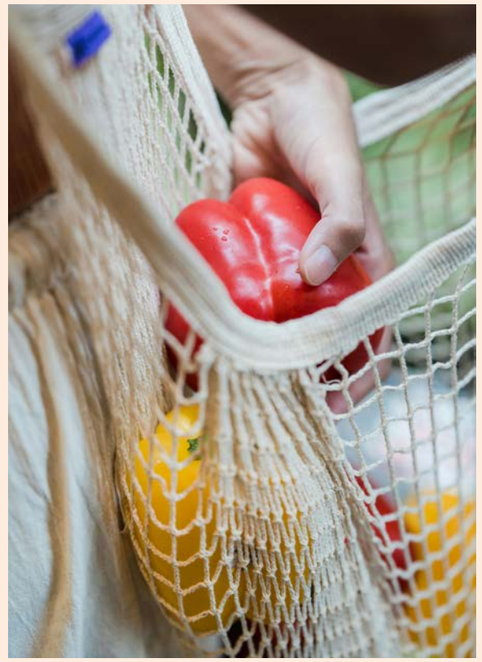
Case Study

Plastic Bag Levy in Ireland

In March 2002, the Republic of Ireland implemented a €0.15 tax on plastic bags, which was levied on consumers at the point of sale. This was increased to €0.22 per bag from 2007. This policy was introduced to curb the excessive use of plastic bags, which were having a significant environmental impact, accounting for an estimated 5% of litter in Ireland (Convery et al., 2007).

The regulations do not distinguish between biodegradable plastic bags and other plastic bags. Paper bags are not subject to the levy, however, which has been criticised by NGOs for its failure to reflect scientific evidence on their environmental impact (Friends of the Irish Environment, 2013).

The introduction of the tax led to a remarkable shift in consumer behaviour, with 90% of consumers switching to long-life, reusable bags within just one year. The levy generated EUR 200 million over 12 years (2002-2013), which is directed into an Environmental Fund used to support various environmental projects across the country (Institute for European Environmental Policy (IEEP), 2017).



Reusable diaper campaign

Overview

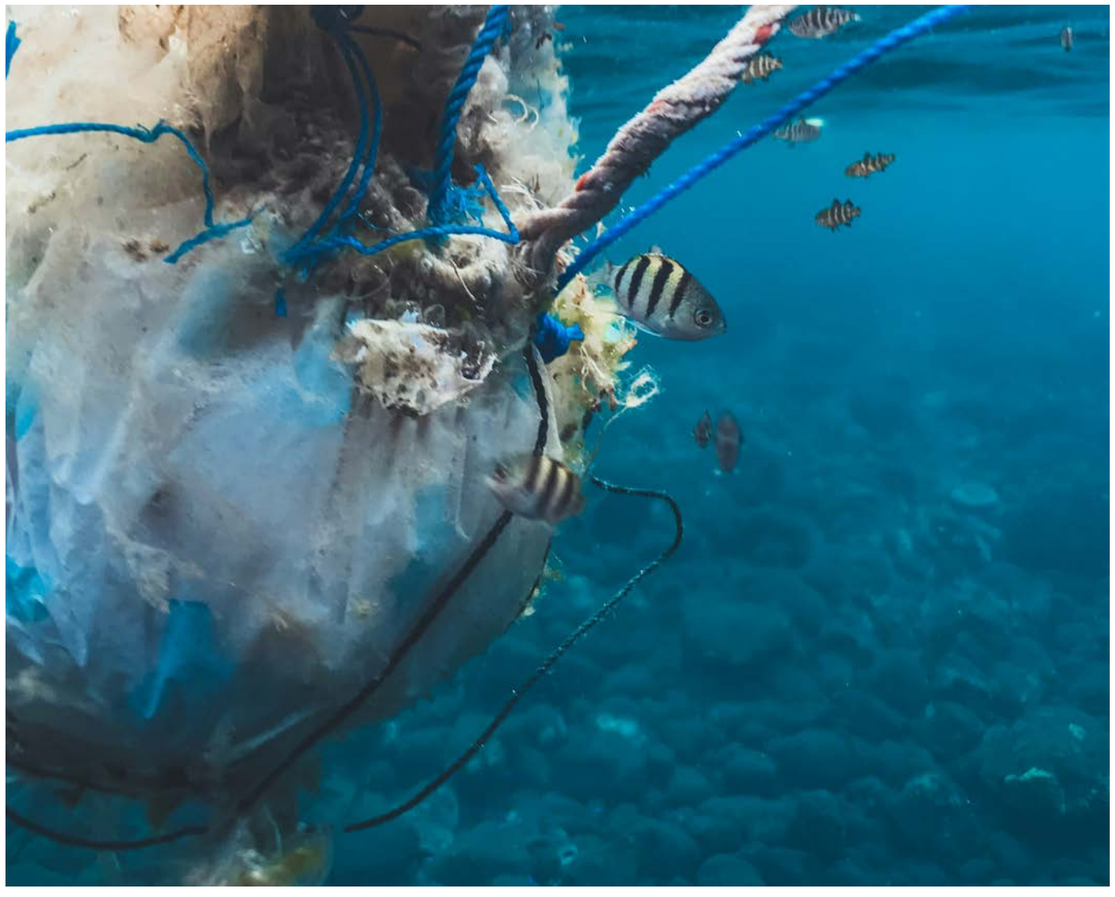
Approximately 11 tonnes of used single-use diapers entered Saint Lucia's seas in 2024, out of a total of 247 tonnes of diapers disposed of. Diapers are the third most common form of plastic pollution in Saint Lucia, behind plastic beverage and non-beverage bottles.

A pilot, conducted in partnerships with the Ministry of Health and the Ministry of Sustainable Development, could test different approaches to incentivising the use of reusable diapers. This could, for example, include providing expectant mothers with free training on the health and financial benefits of reusable diapers and subsidising the inclusion of a trial pack of reusable diapers in the materials given to new mothers in maternity wards.

Assessment

Such a campaign could come into effect in 2030 and reach its full impact, of a 90% reduction in single-use diaper usage, by 2031.

Under these assumptions, tackling single-use diapers through a reusable diaper scheme could result in an 11-tonne annual reduction in plastic leaked into the ocean by 2035 (Figure 5.13) and reduce the amount of contaminated plastic waste sent to landfill by 262 tonnes per year by 2035.



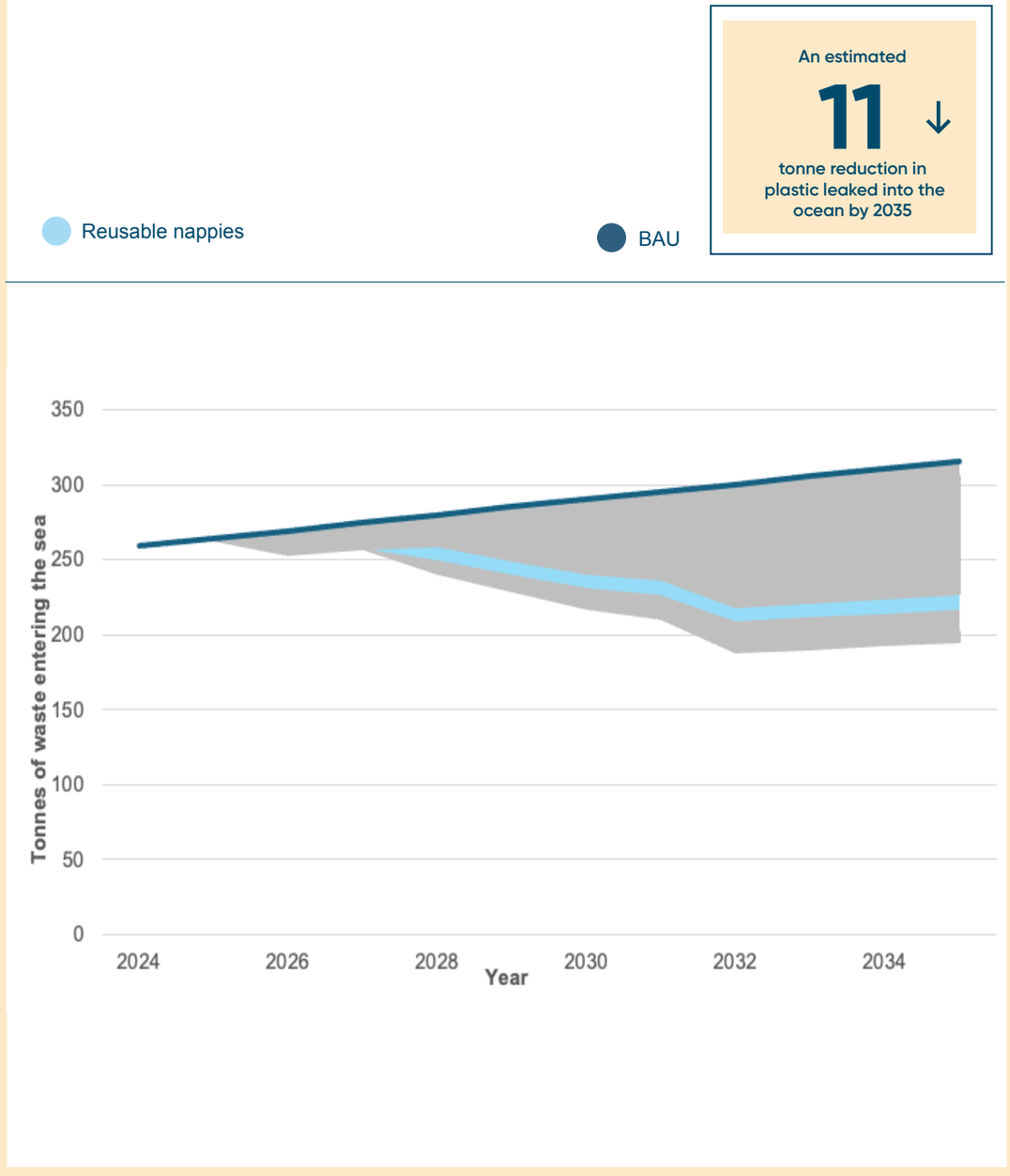


FIGURE 5 13: PLASTIC POLLUTION REDUCTION POTENTIAL OF A REUSABLE DIAPER CAMPAIGN IN SAINT LUCIA

Recommendations

At our in-person workshop in February 2025, this policy received no votes from participants, who were asked to select the top three policies they would most like to see implemented in Saint Lucia.

This suggests that promoting the use of reusable diapers will require a strong awareness and education campaign, as there is likely to be significant resistance, with single-use ‘disposable’ diapers perceived as the more convenient option.

These initiatives should not only highlight the environmental consequences of improper disposal of single-use diapers, but also highlight the ease of using reusables, their potential health benefits, and the cost savings of switching to reusables.

Key advocates for this initiative should include professionals who regularly engage with new parents, such as labour and delivery staff, paediatric nurses and doctors, midwives, community healthcare practitioners, and parent support groups.

A major challenge for this policy is the constantly changing audience, as new parents emerge continuously. Effective communication and buy-in from these key advocates will therefore be essential, as habits form quickly, and children only use diapers for a limited time.

In the medium to long term, the goal is to establish reusable diapers as a societal norm, ensuring sustained adoption. Looking further ahead, the policy could also be extended to senior care.

Case Study

Bumbi – Common Seas’ Reusable Diaper Project in Indonesia

In 2020, Common Seas started working with local government, community groups and mothers in East Java to provide families with free or subsidised reusable diapers.

The project was born after our Plastic Drawdown analysis—highlighting significant single-use diaper pollution levels—was presented to the Indonesian Government through the World Economic Forum.

We built relationships with local partners, including PC Muslimat, the largest women’s charity in Indonesia, and the Governor of East Java. At the same time, we ran an intense design process, working with local mothers and seamstresses to test and improve reusable diaper prototypes, always seeking to use sustainable materials.

In 2021, we sent a set of these diapers to 1,000 families. The results were astonishing. After six months, 91% of the babies were still using the reusable diapers. This prevented the use of 300,000 single-use diapers and created a total household economic benefit of $55,645. There was also an 86% reduction in diaper rash and the eradication of urinary infections.

In the 24 months after this project started, local seamstresses – employed and trained by the project – made about 20,000 reusable diapers. These were distributed to 4,000 families, which means around four million single-use diapers could be avoided per year.

This project demonstrates that a reusable diaper scheme can viably scale to significantly reduce single-use diaper use, while boosting the local economy and protecting the health of babies and families.

Household waste minimisation

Overview

This activity would be an extension of the waste minimisation activities discussed in Section 5.5.

Assessment

A household waste minimisation plan could be introduced in 2027, with its full impact – resulting in a 4% reduction in plastic waste generation – expected by 2032.

Under these assumptions, introducing waste minimisation guidelines at the household level could reduce marine litter in Saint Lucia by 15 tonnes per annum by 2035 (Figure 5.14) and reduce the amount of plastic waste sent to landfill by 333 tonnes per year by 2035.

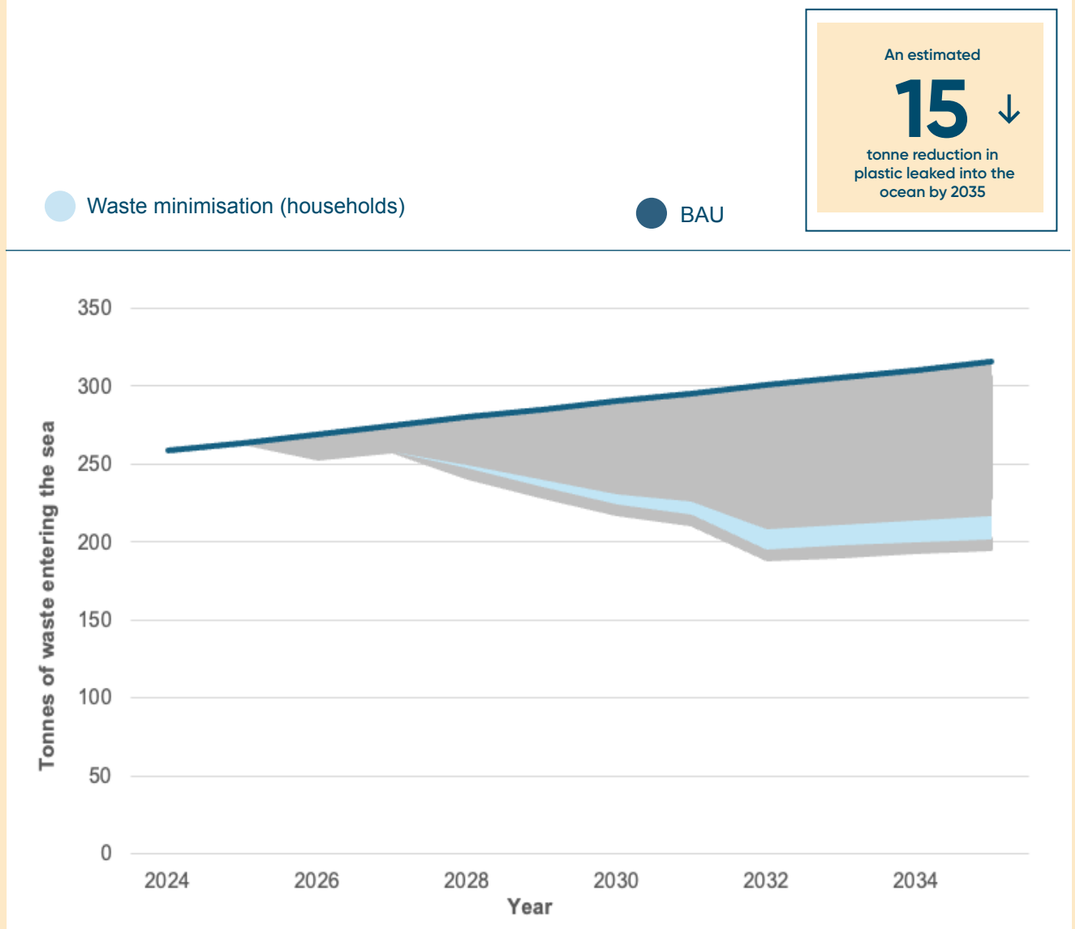


FIGURE 5 14: PLASTIC POLLUTION REDUCTION POTENTIAL OF WASTE MINIMISATION ACTIVITIES IN SAINT LUCIA

Recommendations

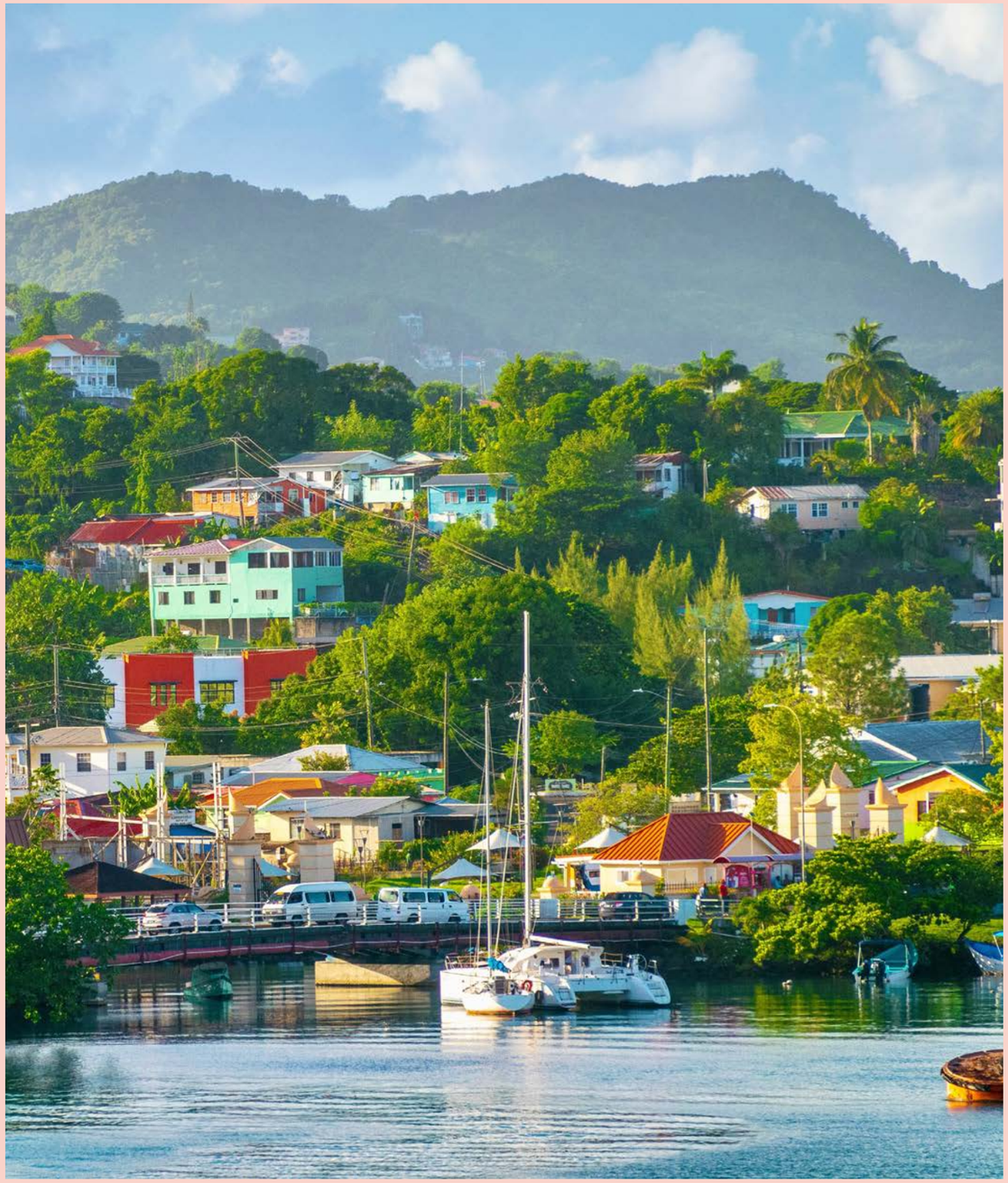
Household waste minimisation guidelines should focus on practical strategies to reduce waste generation, encourage reuse, and improve recycling efforts. A key recommendation would be promoting the source separation of waste, ensuring that recyclables, organic waste, and general waste are sorted correctly, and recyclable materials are returned to redemption depots.

Households should be encouraged to opt for reusable alternatives to plastic such as cloth shopping bags, refillable containers, and durable kitchenware. Promoting responsible consumption – such as buying in bulk, choosing products with minimal packaging, and repurposing items instead of discarding them – can further support waste reduction efforts.

Awareness campaigns and community-led initiatives, such as neighbourhood clean-ups and waste reduction challenges will enhance adoption. For example, the “Plus Belle Village” competition – which was launched as part of the nation’s Independence Day celebrations to promote community engagement and enhance the aesthetic appeal of villages across the island – could be restored to support adoption.

Monitoring and feedback mechanisms, such as household waste audits, help track progress and identify areas for improvement, ensuring the long-term success of waste minimisation efforts at the household level.

5.11 Overarching policy implementation support



As identified in the ML-MAP, a range of wider initiatives will also be needed to support the successful implementation of these policies. The effective implementation of plastic-related policies requires a comprehensive approach that goes beyond regulatory design.

Three key enabling measures are critical to ensuring the success and long-term impact of the policies assessed in this report:

- Education and awareness-raising
- Monitoring and evaluation mechanisms
- Sustainable financing strategies

Together, these components help create the necessary conditions for coordinated action, stakeholder engagement, and sustained policy effectiveness.

Education

Public education and awareness-raising campaigns are fundamental to the success of each of the policies discussed in this report and should be a core part of their implementation plan. Education should range from broad messaging about plastic pollution (to encourage all stakeholders to play their part) and sector-specific capacity building, to education programmes in schools to foster long-term awareness and responsible environmental behaviour.

A 2022 IUCN survey of Caribbean stakeholders (IUCN, 2022a) showed that respondents believed women are significantly more likely to act on plastic pollution than men. As such, education initiatives should ensure men are also inspired to act on plastic pollution.

Plastic focused public communication
Widespread communication initiatives can foster a broad understanding of plastic pollution and encourage collective action. These campaigns should utilize diverse communication channels – including social media, influencer marketing, public service announcements (PSAs), television, and community outreach – to convey the environmental impacts of plastic waste.

By promoting shared responsibility, these initiatives will aim to catalyse behavioural changes, such as improving waste management practices, engaging with reuse schemes and supporting the adoption of sustainable alternatives.

Reinstating litter wardens could also provide an additional avenue for educating the public about the impact of littering and dumping.

Sector-specific capacity building
Key sectors will require targeted capacity-building programmes. This includes manufacturing, retail, and waste management.

These programs should provide specialized training to equip industry professionals and local authorities with the necessary knowledge and tools to comply with regulatory requirements and implement effective plastic pollution policies.

By strengthening sector-specific expertise, these programs will facilitate the adoption of best practices and ensure the successful transition to sustainable practices within various industries.

Education programmes in schools
Education programmes in schools play a crucial role in promoting long-term behavioural change by cultivating environmental awareness among young learners. This is explicitly recognized in Saint Lucia's ML-MAP under Pillar 5: Environmental Education and Behavioural Change, which includes the integration of waste management content into the revised lower school curriculum as a key activity.

Plastic pollution education should be incorporated into school curricula to help students understand the causes, consequences, and solutions to the issue from an early age. Hands-on activities, such as recycling projects, beach clean-ups, and sustainability challenges, encourage active participation and reinforce learning. By empowering the next generation with the knowledge and skills needed to make environmentally responsible choices, school-based education programs contribute to a culture of sustainability that extends beyond the classroom and into communities.

Read the case study on the next page to find out more about Common Seas' Education Programme, and our engagement with the Department of Education to hopefully bring our plastic curriculum resources to primary school students in Saint Lucia.

Case Study

Common Seas Education

Common Seas' Education Programme

Common Seas' Education Programme provides fully resourced and freely available lesson packages, resources, training and events for teachers and students.

Together, we are building a global community of young people – our future leaders and citizens – empowered to tackle plastic pollution, starting with their schools.

We have a dedicated Education Officer in Barbados who is helping to integrate plastics education into curricula across the Caribbean, including in Dominica and Barbados.

Additionally, our education team met with Curriculum Officers from Saint Lucia's Department of Education to explore incorporating these resources into the primary curriculum as part of their ongoing curriculum review process.

Monitoring and evaluation

A comprehensive monitoring and evaluation (M&E) framework is crucial to ensuring policies deliver their intended outcomes, facilitating learnings for course correction and future improvements, and preventing ineffective implementation.
The design phase of each policy should incorporate a robust M&E framework to ensure effective implementation and measurable progress. This framework should clearly define:

- **Indicators** for each policy to track progress over time
- **Time-bound targets** associated with each indicator to guide implementation
- **Reliable data sources** to inform policy assessment
- **Reporting timelines and key review points** to facilitate continuous evaluation
- **Roles and responsibilities** of key stakeholders and agencies in data collection and reporting.

Critical stakeholders in this process may include Customs and the Statistics Department, which track data on the import and export of plastic items. They may also include the Saint Lucia Solid Waste Management Authority, which monitors waste disposal volumes at the Deglos Sanitary Landfill.

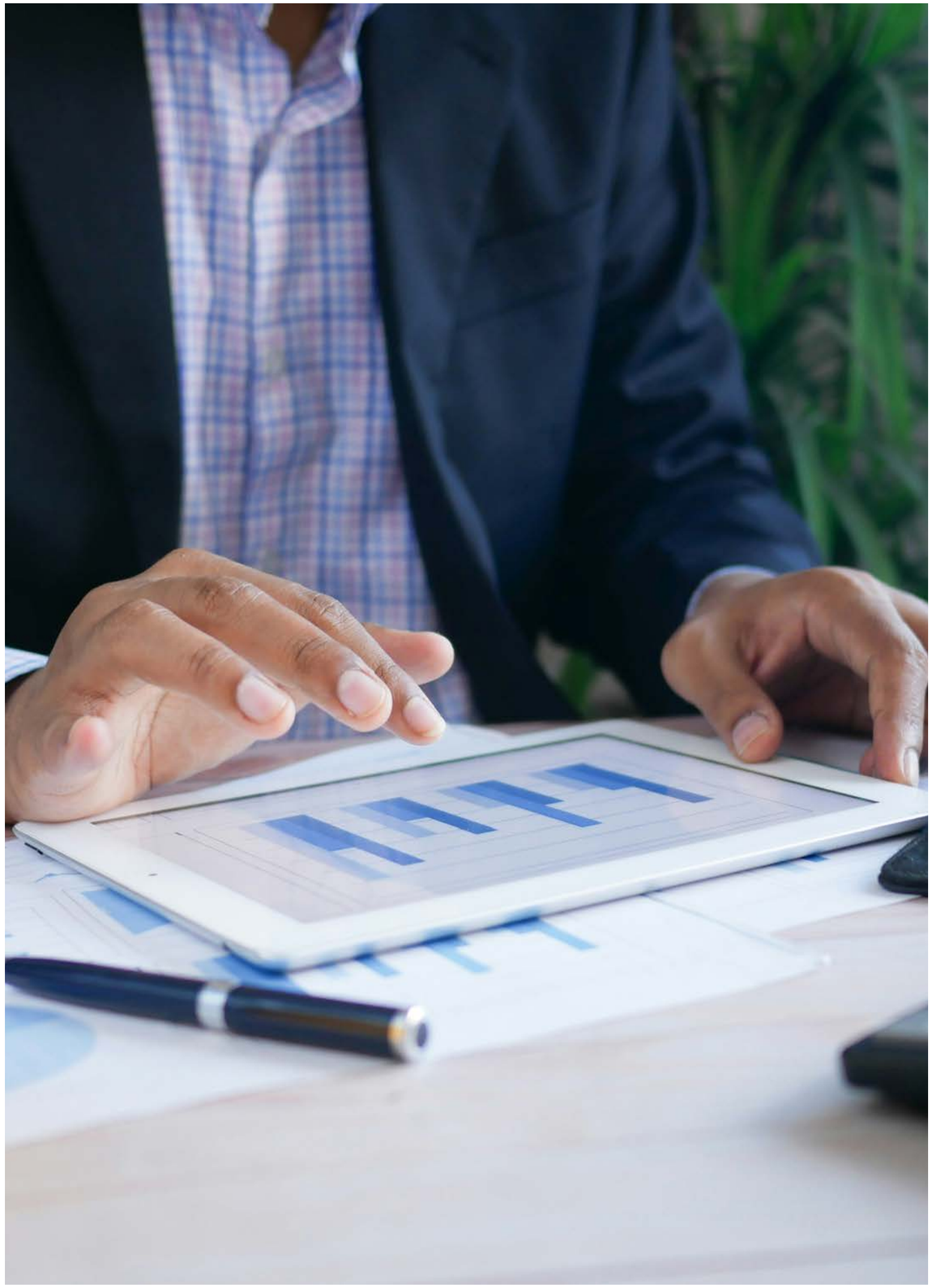
To ensure coordinated oversight, the Department of Sustainable Development (DSD) should assume primary responsibility for monitoring and evaluating policy implementation, ensuring alignment with national sustainability goals, and adaptive management practices.

Financing

The effective implementation of the activities outlined in Saint Lucia's Marine Litter Management Action Plan, and the additional policies outlined in Section 5.9, require targeted investment in internal capacity, rather than solely in project-specific initiatives.

While external funding for projects is available (see Table 2.1), the lack of sustained financial support for core operational costs such as staffing and institutional strengthening poses a significant barrier to the successful long-term implementation of project recommendations. **Without adequate internal resources to coordinate and oversee these initiatives, their impact will remain limited.**

It is essential to address this gap to ensure the effective management and implementation of marine litter reduction strategies. Highlighting this need to funders can help shift financing priorities towards a more balanced approach that supports both capacity-building and project execution.



6 Conclusions

6.1 Policy analysis

The Plastic Drawdown analysis of seven of the key policies set out in Saint Lucia's ML-MAP indicates that they have the potential to reduce plastic pollution in Saint Lucia by 87 tonnes by 2035. This is equivalent to a 28% reduction compared to a business-as-usual projection of plastic pollution in Saint Lucia in 2035.

These measures will also reduce reliance on Saint Lucia's landfill capacity, which will be reached within the next six to eight years, by reducing the amount of plastic waste landfilled by 4,144 tonnes per year by 2035. This is equivalent to a 30% reduction compared to the business-as-usual scenario.

Clearly, these measures represent a significant reduction in waste generation and plastic pollution emissions. However, Saint Lucia will require additional measures to put the country on a path to eliminating plastic pollution in the long term.

As a starting point, Common Seas has analysed three additional policies to explore their potential to further reduce plastic waste generation and pollution. Our analysis suggests that plastic pollution could be reduced by a further 10% (33 tonnes), to a 38% cumulative reduction by 2035 (120 tonnes total). These three policies could also reduce the amount of plastic waste landfilled by 828 tonnes per year by 2035, which is equivalent to a 6% reduction. Combined with the ML-MAP activities, these measures would reduce the amount of plastic sent to landfill by 4,970 tonnes per annum in 2035, a 36% reduction compared to BAU.

Figure 6.1 illustrates the plastic pollution reduction effect of these policies over time, compared to a business-as-usual projection of plastic pollution in Saint Lucia.

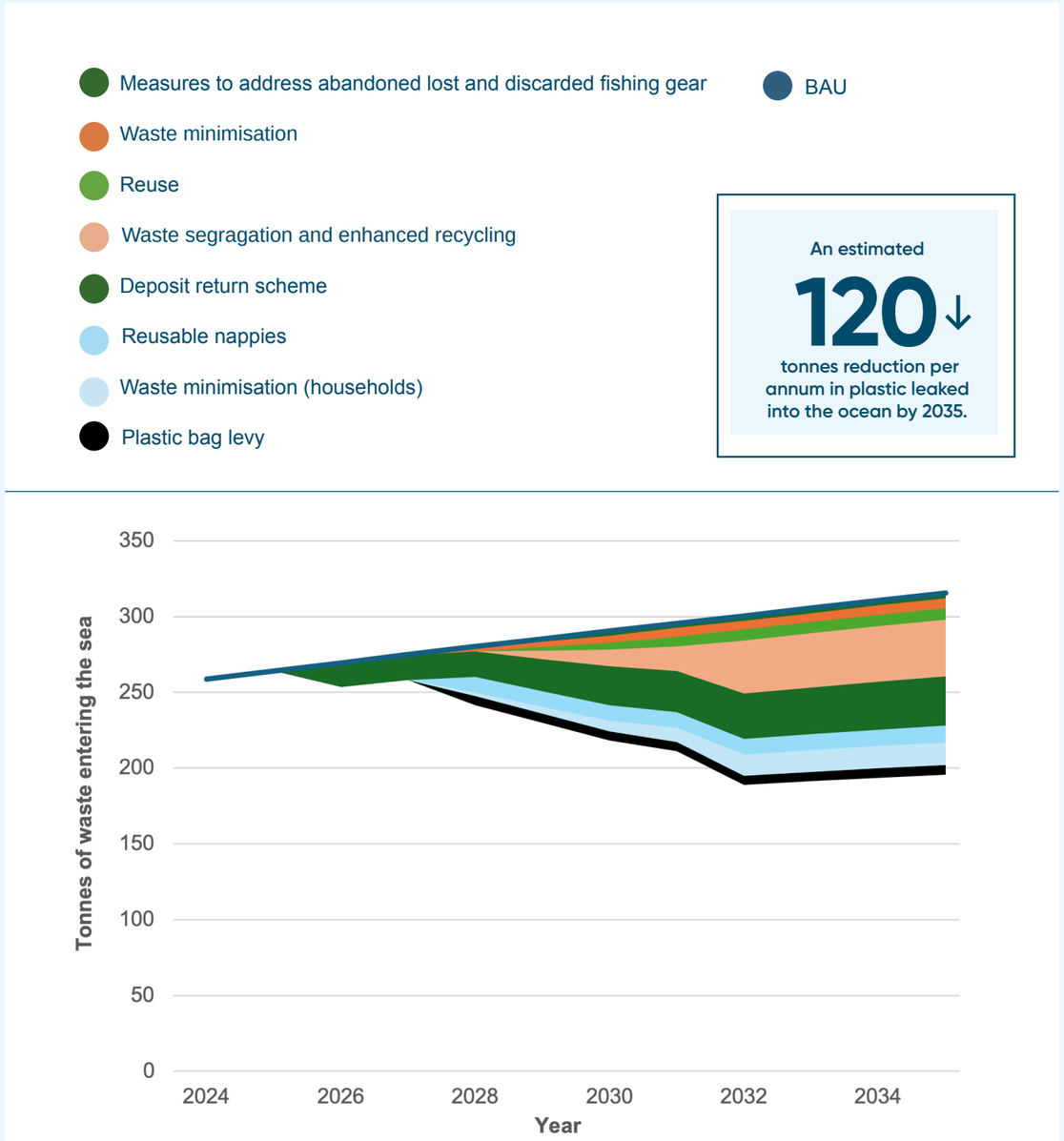
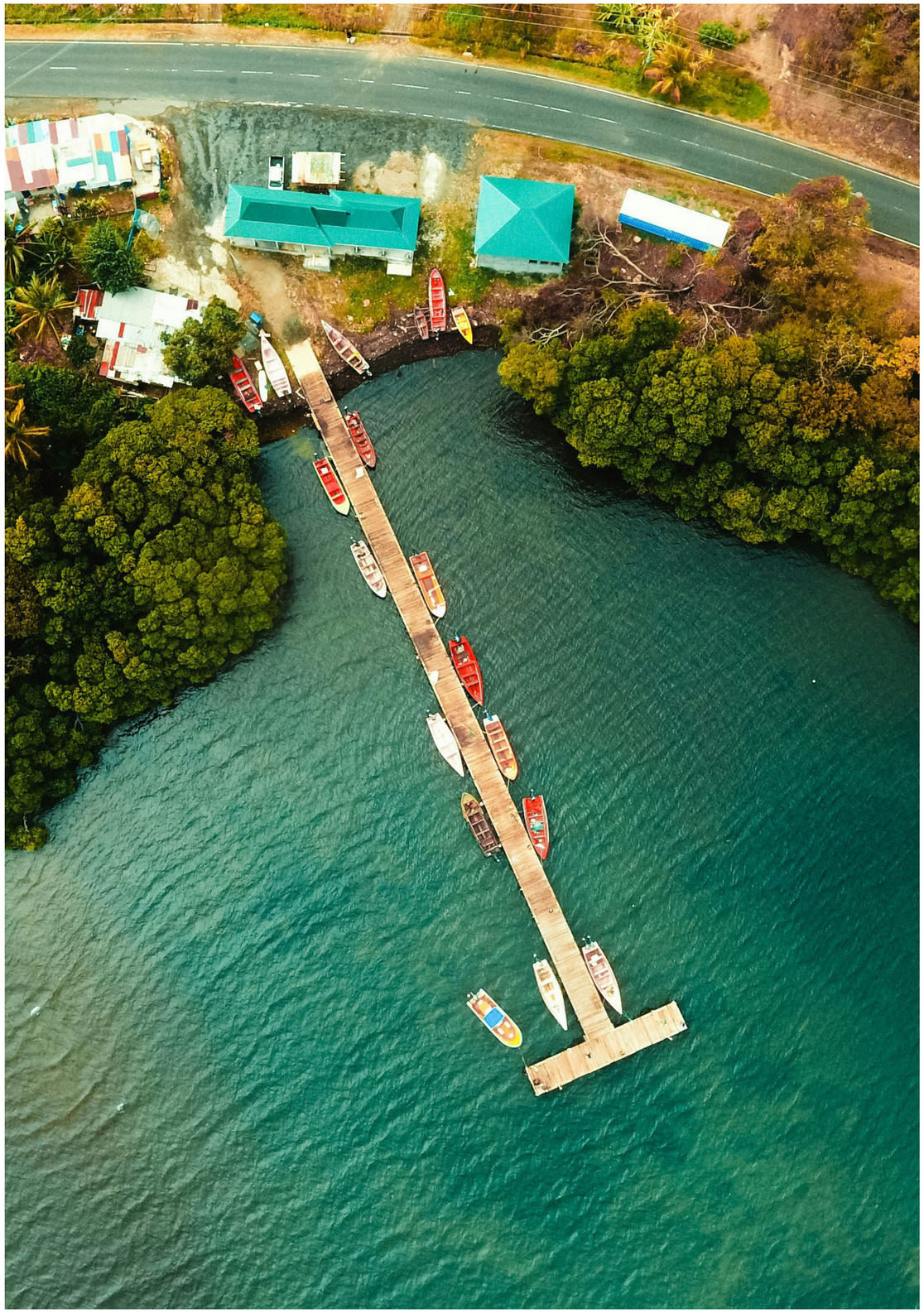


FIGURE 6 1. PLASTIC POLLUTION REDUCTION POTENTIAL OF THE ML-MAP ACTIVITIES AND THREE ADDITIONAL POLICIES ASSESSED IN THIS REPORT

6 Conclusions



6.2 Recommendations

To support national efforts in addressing plastic pollution, we recommend that Saint Lucia advance the implementation of the Marine Litter Management Action Plan (ML-MAP) and its associated policy measures and interventions.

Modelling indicates that the adoption of the seven activities reviewed in this report could result in a 28% reduction in plastic pollution by 2035, relative to a business-as-usual scenario.

The full suite of activities outlined in the ML-MAP, as well as supporting initiatives outlined in this report, will be essential to ensure their effective implementation and to support complementary initiatives aimed at minimising plastic waste and promoting sustainable waste management practices. The ML-MAP provides a critical platform for addressing plastic pollution; however, realising long-term, systemic change will require a transition from the prevailing linear “take-make-dispose” model towards a more circular economy. This includes a reduction in overall material consumption, widespread adoption of reuse and refill systems, and significant enhancement of recycling infrastructure and practices.

In this context, Pillar 1, Activity 1 of the ML-MAP should be prioritised, namely the development and formal adoption of a National Waste Management Policy and Strategy. This will serve as a foundational framework for integrated waste and resource management.

Notably, the draft Plastic Pollution Control Bill contains key provisions that support this strategic shift, including the introduction of Extended Producer Responsibility (EPR) – a crucial element in securing sustainable financing for waste management – economic instruments, and wider bans of problematic single-use plastics.

6.3 Implementation

Successfully implementing the policies identified in the ML-MAP will require a clear roadmap and implementation plan, supported by dedicated resources, clear responsibilities and ownership, and an array of supporting initiatives and measures.

The sections above discuss the different issues and challenges associated with each of the policies. They set out a series of recommendations for each policy, plus recommendations on wider measures and initiatives which will support their implementation.

Table 12, below, presents a proposed roadmap for implementation, identifying the key actions that will be needed over time.

6.4 Concluding remarks

This document presents an analysis of the projected increase in plastic pollution in Saint Lucia over the coming decade and explores the potential reduction effects of a selection of policies on plastic waste generation and leakage. It then proposes a series of recommendations and a road map for implementing those policies.

Eliminating plastic pollution in the long term will require a step-change in plastic use, and its end-of-life management. This roadmap is intended to set out the next steps in that journey. Common Seas and Unite Caribbean look forward to continuing to work with the Government of Saint Lucia to support the implementation of these solutions.

TABLE 12: IMPLEMENTATION ROADMAP - DRAFT

Policy	Year 1	2	3	4	5	6	7	8	9	10	Lead responsibility
Styrofoam and Plastic Food Service Containers (Prohibition) Act, 2019											
Conduct market analysis of affordable alternatives											DSD, with support from SLSWMA (for the separate collection system), the Bureau of Standards (for the biodegradable standards), and Customs (for enforcing the PP ban)
Introduce a short-term levy on Polypropylene products											
Establish standards for biodegradable alternatives											
Incorporate PP into existing ban											
Establish a separate collection and composting system for biodegradable plastics											
Management of Beverage Containers Bill											
Stakeholder mapping to bolster support											DSD & SLSWMA
Provide SLSWMA with training and technical support to manage the Management of Beverage Containers Fund											
Plan for legacy waste											
Develop a robust monitoring & evaluation framework											
Set up a national waste management forum											
Full-scale implementation											
Waste segregation & recycling activities											
Identify viable markets for recycled plastic											SLSWMA, in collaboration with the private sector
Pilot household source segregation scheme											
Introduce source segregation at hotels (using Recycle OECS' proposed model)											
Phased national-level recycling scheme roll-out											
Waste minimisation guidelines											
Review current documents and practices											DCA (for development applications) Potentially the Department of Sustainable Development in collaboration with sector-specific bodies (e.g. SLHTA)
Draft tailored guidelines per sector											
Make waste minimisation plans mandatory in development applications											
Provide training											
Consider incentives											
Reuse schemes											
Review and update regulations blocking reuse											DSD, in partnership with private sector and SLSWMA
Create large-scale pilots in urban areas for viability											
Launch education campaigns and use incentives											
Establish reuse infrastructure (e.g. centralised washing facilities at hotels)											
Progressively expand scheme to cover a broader range of products and sectors											
Waste Management Plan for the fisheries sector											
Conduct stakeholder mapping and consultations to better understand the nature and scale of the problem											Department of Fisheries, with collaboration from other stakeholders (e.g. dive operators, DSD, etc.)
Launch awareness campaigns followed by targeted training											
Create waste records database to provide better data in the long term on fishing gear use and loss rates*											
Evaluate solutions such as increasing waste disposal points at landing sites, track and trace initiative, retrieval of lost gear through dive operator partnerships and legislative updates											
Full-scale roll-out of solutions identified as viable and effective at reducing Abandoned, Lost and Discarded Fishing Gear (ALDFG)											
Plastic bag levy											
Establish a technical working group to guide the policy's design and scope											Department of Sustainable Development, with support from the Ministry of Finance and Customs
Conduct a national public consultation on the detailed policy proposal											
Implement the levy on all single-use plastic bags, clearly inform businesses about reporting structures and requirements											
Regular monitoring (e.g. annually or every 2-5 years) to track the impact of the charge, with potential periodic increases in the charge											
Reusable diaper campaign											
Conduct further assessment of the feasibility and potential barriers, given the lack of support at the workshop											Potentially a collaboration between the Ministry of Health, Wellness and Elderly Affairs, Department of Sustainable Development, and community organisations
Develop targeted education campaigns to address barriers											
If deemed feasible, develop partnerships with local government, community groups, and mothers, design and test reusable diaper prototypes											
Implement a subsidised or free reusable diaper programme											
Household waste minimisation											
Develop practical household waste minimisation guidelines focusing on source separation and reusable alternatives											Department of Sustainable Development, potentially in collaboration with SLSWMA and community organisations
Launch public awareness campaigns to promote the guidelines and encourage responsible consumption											
Potentially explore incentives or community-based programmes to further encourage waste reduction at the household level											

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Appendices

A. Interviewees

Table A0.1, below, outlines the stakeholders interviewed so far. Several interviews are still pending, which we aim to complete as part of this report.

TABLE A0.1: LIST OF ORGANISATIONS INTERVIEWED FOR THIS REPORT

	Organisation/Agency	Date Interviewed
1	Department of Fisheries	November 29th, 2024
2	Water and Sewerage Company Inc. (WASCO)	December 4th, 2024
3	Customs Department	N/A questions emailed
4	Transportation consultation	N/A questions emailed
5	Saint Lucia Solid Waste Management Authority (SLSWMA) representative 1	December 11th, 2024
6	Saint Lucia Solid Waste Management Authority (SLSWMA) representative 2	January 9th, 2025
7	Local Recycling Company - Biohelps	January 14th, 2025
8	Local Recycling Company - Recyclene	January 14th, 2025
9	Local Recycling Company – Plastic Solutions	January 15th, 2025
10	Saint Lucia Hotel and Tourism Association (SLHTA)	January 16th, 2025

B. The Plastic Drawdown tool

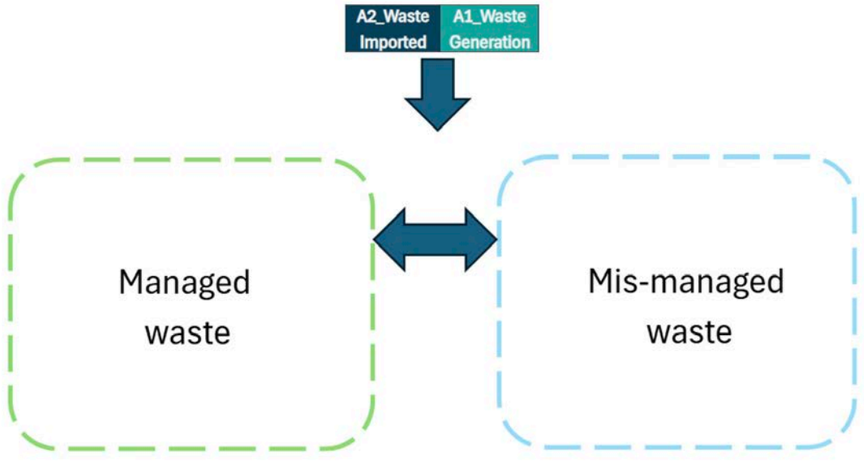

FIGURE B.0.1 HIGH-LEVEL DIAGRAM OF THE PLASTIC DRAWDOWN TOOL

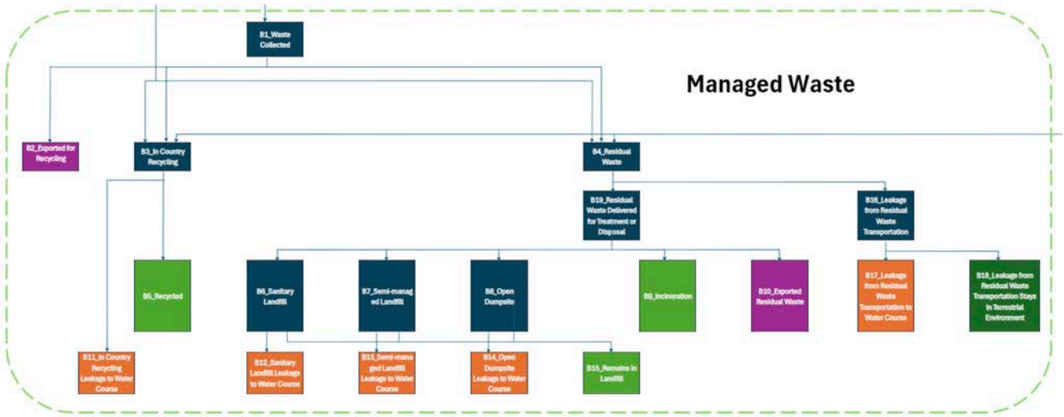

FIGURE B 0.2 COMPONENTS OF THE MAIN MANAGED WASTE FLOW (OUTLINED IN GREEN)

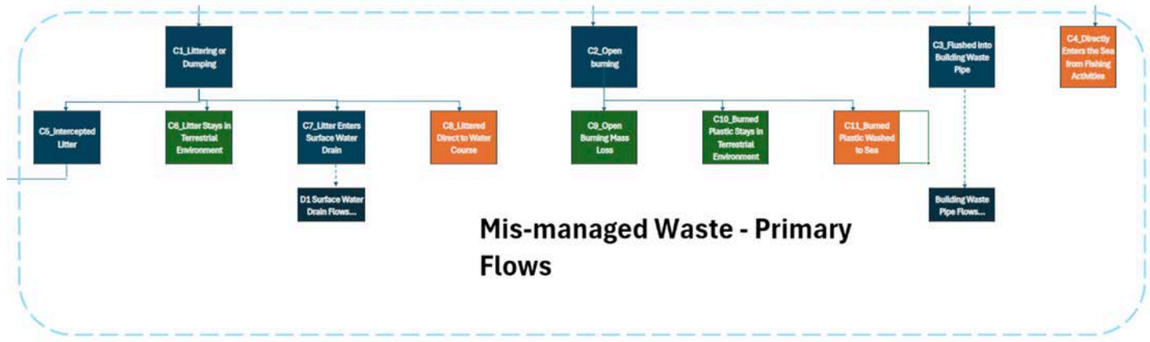

FIGURE B 0.3: COMPONENTS OF THE MAIN MIS-MANAGED WASTE FLOW (OUTLINED IN BLUE)

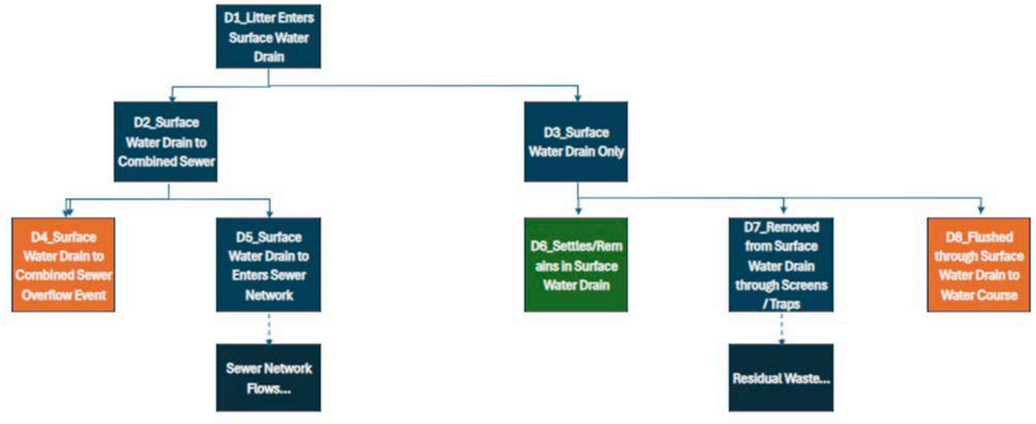

FIGURE B 0.4 DETAILED SURFACE WATER DRAIN FLOW (WHICH LINKS TO ‘D1’ IN THE MISMANAGED WASTE FLOW OUTLINED IN BLUE)

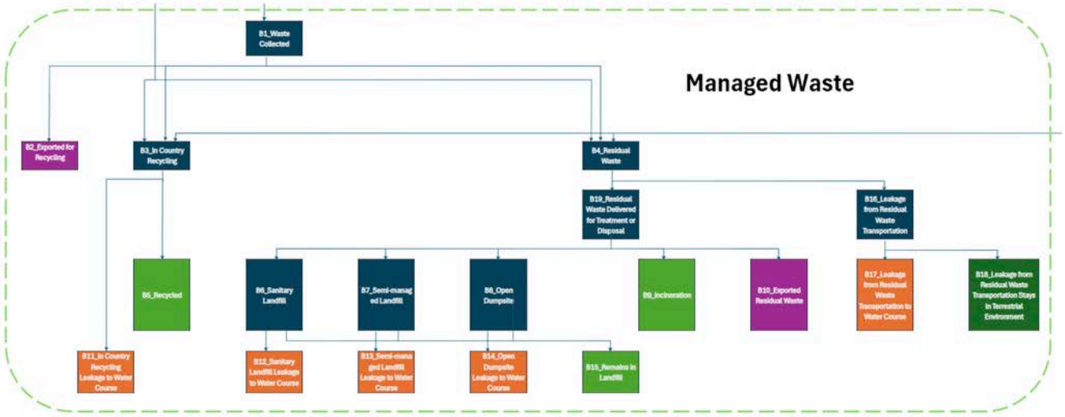

FIGURE B 0.5 DETAILED BUILDING WASTE PIPE FLOW (WHICH LINKS TO ‘C3’ IN THE MISMANAGED WASTE FLOW OUTLINED IN BLUE)

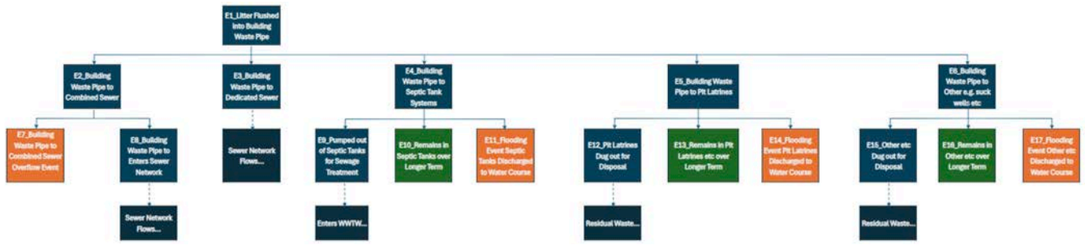

FIGURE B 0.5 DETAILED BUILDING WASTE PIPE FLOW (WHICH LINKS TO ‘C3’ IN THE MISMANAGED WASTE FLOW OUTLINED IN BLUE)

C. Plastic policies and regulations

The Government of Saint Lucia adopted a Marine Litter Management Action Plan in 2023 (see item 7, below).

A National Waste Management Strategy was initiated in 2003 but has, to date, not been submitted to the House of Assembly and Senate for approval.

However, there are currently several other key pieces of legislation that govern different aspects of solid waste management in Saint Lucia. These provide a solid foundation to build the action required to reduce plastic waste and litter.

1. The Saint Lucia Solid Waste Management Authority Act (Cap 6.10) dictates the governance structure and authority for waste management (including plastic) in Saint Lucia. It establishes the island’s Solid Waste Management Authority (SLSWMA) as the implementing body of the Act.

2. The National Conservation Authority Act (Cap 6.01) established the National Conservation Authority (NCA) as a corporate body to conserve the natural beauty and topographic features of Saint Lucia. The Act authorises the NCA to prohibit a person from littering on a beach or protected area and to remove derelict objects from these locations.

3. The Saint Lucia Air and Sea Port Authority Act (Chap 8.13) prohibits, restricts and controls the depositing of any substance, solid matter, article or thing polluting or likely to pollute the waters of any seaport (including plastic), and the disposal of garbage, papers, refuse or other material at an airport or seaport, except in the receptacles provided for that purpose.

4. The Litter Act (24 of 1983, 15 of 1985 and 14 of 1993) establishes anti-littering regulation and enforcement approaches, including for plastic waste. This was repealed by the Waste Management Authority Act.

5. The Environmental Protection Levy Act (2005) establishes financial levies on items that are difficult to recycle or dispose of, including tyres and motor vehicles. This has since been repealed.

6. The Styrofoam and Plastic Food Service Containers (Prohibition) Act (2019) prohibits the importation, manufacture, sale, use and distribution of Styrofoam or plastic food containers. The Act was amended in 2020 to extend the timeframe allowed for the use of existing prohibited stock, due to the Covid-19 pandemic making alternatives to the banned single-use plastic food service containers difficult to procure. The Act is supported by the application of a zero percent (0%) import duty on all bio-degradable and compostable alternatives.

7. The Marine Litter Management Action Plan (2023) provides an overarching plan for the management of marine litter, including plastics.

Together, these policies provide strong foundations for plastic waste management, covering the key areas of governance, financing, regulation, and enforcement. However, their efficacy to date has been limited by a range of implementation and enforcement challenges.

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