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Summary version

# Plastic Pollution Prevention in Curaçao

*Gap analysis of current legislation,  
policies and plans*



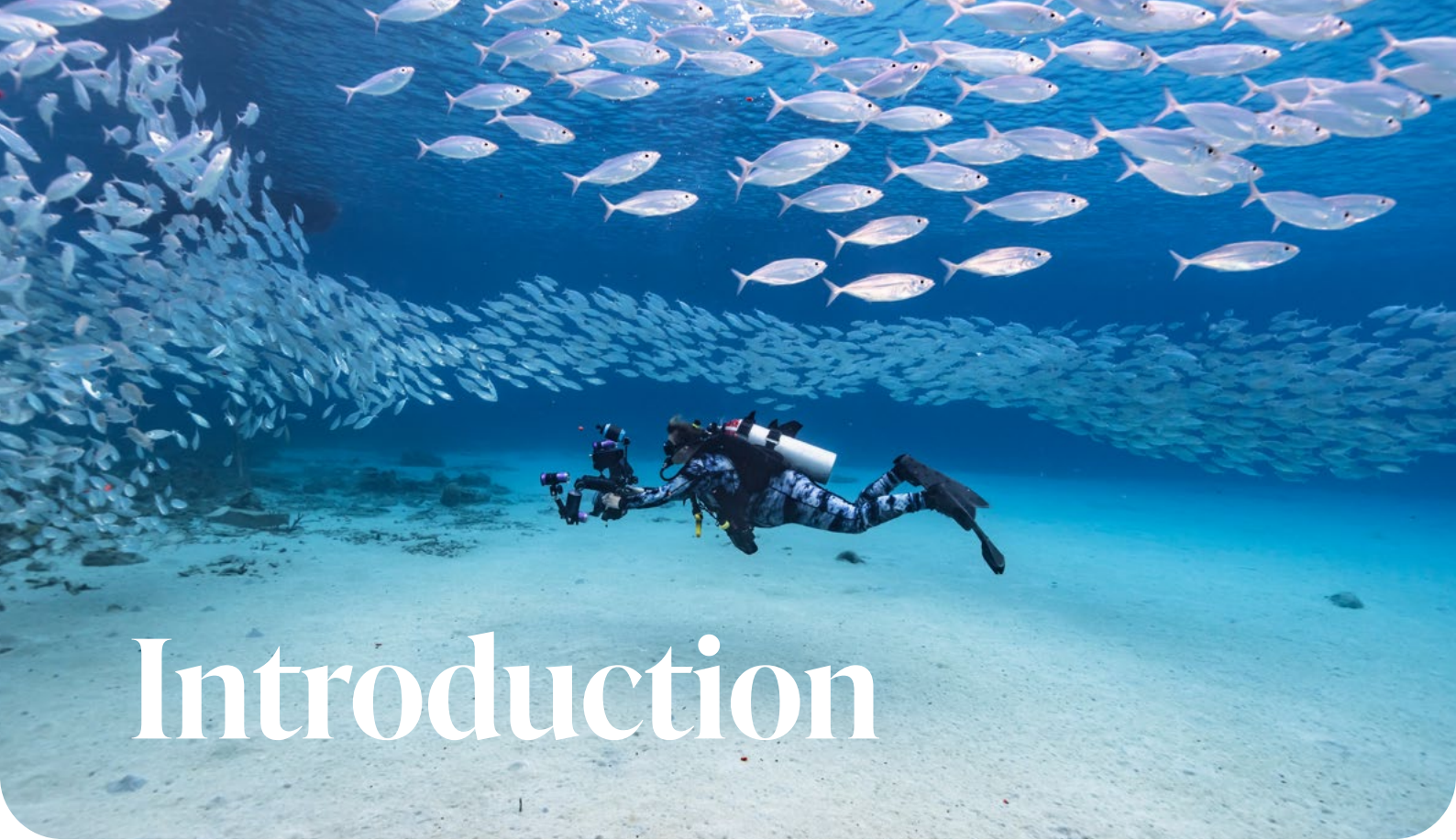
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MINISTERIE VAN  
GEZONDHEID, MILIEU EN NATUUR

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*This research has been carried out independently.*



# Introduction

Small Island Developing States (SIDS) such as Curaçao are particularly vulnerable to plastic pollution due to their geographical location, limited waste management infrastructure, reliance on ocean-based industries like tourism and fishing and limited capacity for mitigation and adaptation

Effectively addressing plastic pollution requires substantial legislative and policy changes in Curaçao, including strict import regulations and support for international treaties on plastic pollution. Failure to do so not only threatens human health and biodiversity, but also undermines human rights. Efforts to mitigate plastic pollution and ban single-use plastics are underway. For instance, the government of Curaçao is working on a Legislative Environmental Framework (Milieukaderwet), which clusters different environmental measures. Furthermore, a member of parliament has drafted a proposal to amend a current National Ordinance Public Order (Landsverordening Openbare Orde) to

include a (partial) single-use plastic ban. These efforts alone are insufficient to tackle the issue comprehensively. Closing gaps in policy and legislation is crucial to safeguard the environment and achieving international obligations in plastic pollution mitigation.

An analytical framework, based on the Environmental Investigation Agency's Plastic Pollution Pillar II, identifies gaps across five categories: Global Objectives, Waste Prevention, Waste Management, Microplastics and Standardisation.

Through application of the analytical framework, we offer recommendations for modifications to the existing legislation to accomplish certain goals concerning the management and/or mitigation of plastic pollution. We conclude with a series of recommendations that will provide policymakers and other relevant stakeholders with the tools to address the plastic pollution challenges on Curaçao.

# Environment

Plastic consumption has surged over the past decade, with global production doubling from 234 million metric tonnes (Mt) in 2000 to 460 Mt in 2019. However, only a fraction of discarded plastic is recycled, leading to widespread pollution, especially in regions like the Caribbean. Plastics constitute a predominant and enduring component of marine debris, comprising at least 85 percent of total marine waste. The mismanagement of plastic waste, fuelled by inadequate infrastructure and ineffective landfill operations, leads to its dispersal through various channels, including wind, wastewater outflows, and waterways, ultimately polluting water bodies, land, and the marine environment, posing significant environmental risks. If current trends persist, projections indicate a staggering 12.000 million Mt of plastic waste in landfills or the environment by 2050.

Governments have traditionally focused on addressing plastic pollution downstream, in the post-consumption phase, but recent efforts have expanded to include the upstream stage of the plastic life cycle, which encompasses production and consumption. This shift poses unique challenges for Small Island Developing States (SIDS), which often lack the capacity to enhance sustainability in plastics manufacturing, minimize consumption, and promote efficient recycling.

Despite these challenges, some SIDS have implemented measures to address plastic pollution, such as bans on plastic bags. However, managing local plastic waste remains a significant challenge, compounded by inadequate waste management infrastructure. This issue is particularly relevant for Curaçao, which grapples with littering problems and illegal waste dumping, exacerbated by insufficient regulatory measures and enforcement.

Since becoming an autonomous country within the Kingdom of the Netherlands, Curaçao has witnessed an increase in illegal dumping due to the absence of fines for waste dumping. Inadequate regulation and enforcement mechanisms further exacerbate the problem, highlighting the need for stronger regulatory frameworks and enforcement measures to combat plastic pollution effectively.

# Governance

In Curaçao, the Ministry of Public Health, Environment, and Nature (GMN) proposed a policy strategy aimed at phasing out plastics. Despite its goals to ban selected single-use plastic products and increase plastic bottle recycling, concrete policy implementation has yet to materialize.

Efforts to draft environmental legislation, including the proposed ban on single-use plastics, face challenges due to the time-

consuming legislative process and resource constraints.

Curaçao's designation as a non-UN Member/Associate Member limits its access to resources and tools available to SIDS. While it participates in SIDS initiatives and programs through the UN regional commissions.

# Socio-Economic

Curaçao grapples with “lock-in” mechanisms, particularly evident in the widespread use of single-use plastic bags at local supermarkets. This phenomenon is perpetuated by the convenience they offer and established supplier relationships. Resistance to adopting environmentally friendly alternatives, like bag recycling, stems from this “lock-in,” hindering transitions towards sustainability.

Transition governance seeks to mitigate unsustainable lock-in processes present in regimes, fostering gradual rather than radical change. However, in Curaçao, companies importing plastic products show slow concern for waste management, driven by profit motives that conflict with environmental objectives. Market

mechanisms further entrench this “lock-in,” making it challenging to transition to waste-free alternatives.

Curaçao must recognize the limitations of an expansive growth model reliant on capital accumulation, which results in significant environmental harm, including pollution, coral reef degradation, and fossil fuel dependency. Adopting a proactive approach to sustainability is crucial, avoiding the misconception of “grow dirty now, clean up later,” to prevent irreversible environmental damage.

# Waste and Waste Management

A significant challenge facing Curaçao is its waste management system, identified as a critical priority in national reports and development plans. With approximately 170,000 tons of solid waste generated annually, the island faces a pressing issue exacerbated by limited landfill capacity and inadequate waste management infrastructure. The Malpais landfill, the primary disposal site, lacks essential features to mitigate environmental risks associated with landfills, posing concerns

about soil contamination, disease spread, and greenhouse gas emissions.

The decentralized approach to waste management in Curaçao involves multiple entities, including Selikor NV and various ministries. While government policies outline strategies to reduce plastic pollution and transition to a circular economy, implementation remains stalled due to outdated legislation and bureaucratic bottlenecks.

## A Global Plastics Treaty

The United Nations Environment Assembly's resolution in March 2022 signaled a pivotal moment in the fight against plastic pollution by endorsing the development of a global plastics treaty. This treaty aims to comprehensively address plastic pollution throughout its lifecycle, including ocean pollution and microplastics. With the involvement of the Kingdom of the Netherlands in these negotiations, there is a clear commitment to international cooperation on this pressing issue.

A global plastics treaty offers numerous advantages, particularly for Small Island Developing States (SIDS) and developing economies. By establishing universal guidelines and standards, it streamlines efforts to combat plastic pollution and reduces the financial burden associated with individual strategies.

While local initiatives are important, effective solutions require a coordinated global approach that supports sustainable production and consumption practices. Given the cross-border nature of plastic pollution, international cooperation is essential to mitigate its adverse effects.

The overwhelming support from 175 member states for a binding international plastics treaty underscores global recognition of the need for collective action. Assessing Curaçao's readiness to participate in this global effort is crucial for evaluating its capacity to address plastic pollution within an international framework.

An underwater photograph showing a vibrant coral reef in the foreground. The water is clear blue, and sunlight filters down from the surface, creating a bright, shimmering effect. A school of small fish is visible in the mid-ground, swimming towards the right. The overall scene is serene and natural.

# Aims and Methodology

In this gap analysis the analytical framework developed by Steenhagen, Fuller, Farrelly *et al.* (2023) was used to assess the impact of legislation, policies and plans on plastic pollution prevention. To this end legislation and policies were analyzed for usage of the following terminology: ‘waste’, ‘plastic’, ‘refuse’, ‘garbage’, ‘litter’, ‘pollution’, ‘microplastic’, ‘marine debris’, ‘hazardous waste’ ‘toxic waste’ ‘emission’ and ‘contaminant’ in both English and Dutch<sup>1</sup>. When any of the terms were found in the text, it was analyzed for its correlation to plastic pollution prevention through application of the analytical framework.

The framework consists of the following general themes: Global Objectives, Waste Prevention, Waste Management, Microplastics and Standardisation.

Gaps in the policy framework were identified using a ‘traffic light’ system. Green represented explicit mention of the themes, yellow indicated partial inclusion or inference, and red indicated absence of themes.

Three laws were found to contain one of the terms, however, none of the legislations had to do with plastic pollution or the mitigation and/or elimination thereof.

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<sup>1</sup> ‘afval’; ‘afvalvermindering’; ‘vast afval’; ‘zwerfvuil’; ‘vuilnis’; ‘plastic’; ‘vervuiling’; ‘microplastic’; ‘zeeafval/zeepuin’; ‘gevaarlijk afval’; ‘giftig afval’; ‘emissie/uitstoot’; ‘verontreinigende stof’

Legislation	Term
Landsverordening Maritiem Beheer (AB 2007, 18)	afval
Landsbesluit Invoerheffing papieren en plastic zakken (PB 1977, 241)	plastic
Landsbesluit Afbouw van een aantal economische heffingen (PB 2001, 120)	plastic

As it pertains to policies and plans, eight were selected as ‘key’ to preventing plastic pollution on Curaçao.

However, legislation and policy that did not contain the selected terminology, but that could have to do with one of

the themes of the analytical framework, were still included to determine whether alignment with the goal of preventing plastic pollution could be achieved through minor modifications.







# Findings

## Global Objectives

Global Objectives refer to overarching issues in the prevention of plastics pollution and the potential for national legislation, strategies, and plans to achieve these universal goals. The United Nations Environment Assembly emphasises the need to permanently stop releasing litter and microplastics into the oceans and to prevent harm to marine ecosystems and human activities that depend on them. Furthermore, the World Health Organization

has cautioned against the harmful effects on human health of exposure to plastics and related toxicants.

In our analysis, there was no evident connection between plastic pollution and its consequences on human health in any of the legislation or policies, however, the following provisions of the Goods Ordinance might provide an opening for this:

### **The Goods Ordinance** (*Warenverordening 1997, P.B 1997, 334*)

Article 3, first paragraph, makes it possible to regulate per national decree, in the interest of public health, amongst other things: the composition, the properties, the quality, the method of manufacturing and packaging and the import and export.

Article 16 prohibits the trade of goods that due to their unsoundness (*ondeugdelijk*) could endanger public health or safety.

The Ordinance on the Foundations of Nature Management and Protection (*Landsverordening grondslagen natuurbeheer en -bescherming*) allows modifications to align to treaties, for example:

Article 8A prohibits activities that are prohibited by the SPAW protocol.

This article prohibits the performance of acts or activities referred to in the SPAW protocol. SPAW further demands that parties shall prohibit all forms of destruction or disturbance, including the picking, collecting, cutting, uprooting or possession of, or commercial trade in such species, their seeds, parts or products". Curaçao can decide to draft a national decree that designates (certain) plastics as a disturbance or as a danger to the protection and recovery of certain species of flora.

Subsequently, through policy precautions and preventive measures the potential for harm to the environment and society, even in the absence of solid evidence, should be recognized. This so-called precautionary approach can be found in the Nuisance Ordinance (*Hinderverordening Curaçao, 1994*) and provides the opportunity to bridge this gap. Article 15 sub c states:

that the Minister has considers, in any case, the following when deciding on the permit request:

c. Reasonably anticipated developments that are relevant to the protection of the environment in relation to the activity.

Nowadays, preventive measures take precedence over waste management. The progression of policies and strategies that describe this system are referred to as the zero-waste hierarchy. To align local legislation with the Zero-waste hierarchy model some changes could be made to the

Public Order Ordinance (Landsverordening Openbare Orde), in particular to its second paragraph, which pertains to the practicalities of waste management, including protection of the environment, sanctions and planning.



Figure 1. Zero waste hierarchy (Zero Waste Europe, 2019)

## Waste prevention

Limiting the production and availability of certain plastic items and virgin plastic materials encourages the use of more sustainable alternatives, as well as recycled content. This, in turn, reduces the overall amount of plastic waste entering landfills, incineration, or the environment. As of right

now, there is no legislation, policy or plan mentioning import prohibitions, market restrictions, national reduction targets or limitations on the usage of virgin plastic. The following legislation can be adjusted to accomplish this:

The Goods Ordinance allows that in the interest of public health, rules can be established regarding the composition, quality, condition and properties of goods, as well as rules pertaining to import and export.

The National Ordinance on Import and Export regulates the import and export of goods in the interest of the national economy or internal or external security of the country or the international law. In lower regulations, rules can be set to for example limit the import or export of certain goods. To make this ordinance relevant for our goal, plastic pollution must be linked to either the national economy, security of the country or international law.

The National Ordinance on the Foundation of Nature Management and Protection: makes extra regulation possible with regard to conservation, especially to implement treaties.

In addition, regulating import is another important measure of plastic waste prevention, which can be controlled in the General Ordinance I. U. en D. 1908 and National Ordinance on Tariffs and Import Duties (Algemene Verordening I.U.en D. 1908 (PB 1949, 62) en Landsverordening tarief van invoerrechten, PB 2002, 109):

These ordinances regulate the import of goods, including the levy of import duties. So, changing the fees of undesired plastics or raw materials can, for example, be arranged by levying higher import duties on these products.

## Waste management

The analysed documentation, while addressing various aspects of waste management and environmental sustainability, do not consistently emphasise the transition from waste products to new products with similar performance and characteristics. Furthermore, they do not align with the principles of closed-loop recycling, stressing there is a need for more concerted efforts to foster both primary

and secondary recycling, which should encompass legislative, infrastructural, and awareness-oriented initiatives and should strive for a more circular approach to plastic usage and disposal.

Additionally, with regards to legacy plastics & removal and remediation activities, stringent adherence to safety and sustainability guidelines is paramount. It is

imperative to prevent any inadvertent harm to the environment during these processes, requiring a substantial commitment of technical capacity and resources. The waste management transition from the

disposal-centric approach to one centered on waste reduction, reuse, and the selective recycling of specific waste components should be prioritized.

## Microplastics

The information regarding microplastics in the context of legislation, policies, and plans is absent, highlighting a critical knowledge gap in tackling this pressing environmental concern. The substantial deficiency in the collective awareness leads to a lack of action in addressing the

multifaceted issue of microplastic pollution. Considerable efforts are required to bridge this knowledge gap and develop adequate strategies for the management and reduction of microplastic pollution.

## Standardisation

In the context of the Circular Economy, it is important to establish standards and specifications as foundational frameworks. Standards provide a shared language for various industries and create clear classification systems for materials and consequently for repairs and recycling, which facilitates efficient handling. Important elements of standardisation are transparency and freedom of information. The latter amongst other things through labeling.

The significance of freedom of information lies in ensuring that information is easily accessible to consumers. This

information encompasses details such as recycled content, recyclability, proper disposal methods, compostability, additives, greenhouse gas emissions, and hazard potential. Currently, none of the key documents address the availability of information. Furthermore, this accessibility should extend beyond consumers, reaching all pertinent stakeholders throughout the supply chain. This inclusivity is essential for the application of best practices across all plastics and plastic products. Current legislation has provisions with regards to labeling:

In the interest of public health and safety, the Goods Ordinance (Warenverordening 1997, P.B 1997, 334) prohibits noncompliance with regulations regarding packaging and labeling. It also prohibits labeling that is incorrect or incomplete or deceptive.

Once there are standards for products, minimum requirements can be established and monitoring and reporting can be applied. These components are essential for single-use plastic regulation. This entails managing suspected or identified instances of noncompliance through measures such as financial penalties, imprisonment, or confiscation. Clarity in definitions of technical terms within the

regulation is crucial to prevent confusion, ensuring effective implementation and interpretation.

To date, there is no mention of compliance measures in any of the key analysed documentation. However, there is room in the following ordinances to establish effective compliance mechanisms:

Even though there is no authority in charge of compliance in the area of plastic pollution prevention, legislation has created several bodies tasked with monitoring. For example The Ordinance on the Foundations of Nature Management and Protection (Landsverordening grondslagen natuurbeheer en -bescherming, PB 2018, 66 GT) establishes the appointment of an advisory committee on Nature Management and Protection, as well as a management or conservation authority (beheersinstantie). The advisory committee is, among other things, tasked with monitoring the implementation of the national ordinance. And the management/conservation authority is responsible for the implementation of designated environmental treaties.

Moreover, based on the Public Order Ordinance (Landsverordening Openbare Orde, PB 2015, 31 GT) pollution of public spaces can be investigated and the provisions of this ordinance can be enforced by designated officials and persons. The same is the case for the Nuisance Ordinance (Hinderverordening 2017, 67 GT). Designated persons can detect and enforce this ordinance when environmentally harmful activities are carried out without a permit of the minister of GMN.



# Recommendations

## Global Objectives

- » Contemplate a dedicated commitment towards formulating comprehensive national strategies for eradicating plastic pollution.
- » Create strategies that encompass specific targets for reducing and preventing plastic waste.
- » Establishing policy frameworks that place a higher priority on prevention than on waste management, with particular mention of “plastic pollution prevention/elimination” in pertinent policy frameworks.
- » Commit to global and regional agreements and initiatives focused on preventing and eliminating plastic pollution. Strengthen regional cooperation with the aim to combine knowledge and resources to eliminate plastic pollution collectively
- » Guarantee a comprehensive life cycle strategy to plastic prevention by supporting international objectives and methods, along with measurable targets, implemented in national laws, policies, and plans.
- » Address the prevention of plastics and reducing their transboundary movement by ratifying and signing;
- » Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal (Basel Convention)

- » Stockholm Convention on Persistent Organic Pollutants (Stockholm POPs Convention)
- » Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade (Rotterdam Convention)
- » United Nations Framework Convention on Climate Change (UNFCCC)
- » The Human Right to a Clean, Healthy, and Sustainable Environment for all people.
- » Prioritise measures related to climate adaptation and advocate for improved government efficacy. The urgency systems not just from the fact that small islands are most affected by climate change, but also from the fact that adhering to good governance norms is currently, or soon will be, a prerequisite for receiving money from global organisations such as the United Nations or the World Bank. SIDS that demonstrate better climate governance are likely to secure financing ahead of others.
- » Promote horizontal integration by jointly creating plans and policies, both present and future. Combatting plastic pollution effectively entails creating legislative links within the framework of the policy. It is advised that expenditures have a focus on the creation of effective governance structures for the prevention of plastic pollution.
- » Increasing every possibility for circularity. It is important to engage and invest in domestic and international markets for circular plastic alternatives. Given the extent of current plastics production and commerce, the markets for new alternatives might be quite large in the plastics industry alone.
- » Support businesses to adopt alternatives
- » Implement a phase-out period, including a time frame for or businesses in advance of policy implementation
- » Being supportive and open-minded to multilateral institutions that can assist national initiatives by providing research, technical support, and contributing to the formulation of international standards and regulations. As efforts are made to diminish the influx of plastics into the economy and channel funding toward the creation of innovative solutions, international and regional financial institutions have the potential to lend support to Curaçao. It is essential to ensure the inclusion of SIDS in the imminent surge of green and blue investments, as this trend is anticipated to unfold.
- » Allocate budget and invest in effective enforcement mechanisms. Strong penalties have been found to be crucial for achieving high compliance rates for regulatory measures. When penalties are utilised, they must be placed at a level that encourages compliance.
- » Allocate resources for proper communication and awareness campaigns prior to legislative changes.



# Waste management

- » Implement strategies and regulations to stop the entry of ocean bound plastics through shipping, tourism, and fishing.
- » Incorporate, assess, and revise national legislation, plans, and policies to encompass obligations and regulatory measures throughout the entire life cycle of plastics, spanning from upstream processes to midstream activities and downstream usage.
- » Take into account control methods to minimise and eventually stop using the most hazardous plastic materials in production and consumption.
- » Take into account reduction goals for the usage, consumption, and production of feedstocks, precursors, and materials for plastics derived from fossil fuels.
- » Verify that the manufacture of plastics, its precursors, and its materials complies with human rights and environmental justice requirements, protecting the latter.
- » Assure the generation, gathering, and reporting of data on materials, precursors, and feedstocks for plastics.
- » Take into account trade limitations on materials, precursors, and feedstocks made of plastic.
- » Review and adjust relevant financial systems, taxes, fees, and charges in relation to the manufacturing of plastic materials, as well as to specific plastic products.
- » In addition to PET, expand focus on recyclable materials such as HDPE, PP and LDPE. Including ambition targets.
- » Create financial incentives, such as a per-unit rebate for sorted recyclable wastes, that encourage use of the existing recycling facilities at the Malpais landfill and other drop-off centers.
- » Reduce the amount of imported plastics by introducing market-based tools and sustainable funding methods into national laws and regulations. Such as implementing Extended Producer Responsibility (EPR) schemes.
- » Adopt policies and plans to support instructional, and awareness programs aimed at suppliers, retailers, importers/exporters, producers, and other stakeholders in the fishing and tourism industries. This strategy seeks to guarantee future resilience and encourage environmentally friendly methods for the manufacture and use of plastics.

# Waste prevention

- » Make improving the infrastructure and services for Solid Waste Management (SWM) collection a top priority.
- » Design a thorough legislative framework that supports landfill design, monitoring, management and remediation. With a 3–8 year lifespan, the Malpais landfill needs a thorough legislative framework that aims to guarantee the secure and efficient elimination of plastic pollution.
- » Invest in education and capacity development directed toward governmental entities and significant plastic industry stakeholders, including producers, manufacturers, importers, exporters, distributors, and retailers.
- » Explore opportunities for reverse logistics/return cargo, especially in conjunction with legal container deposit schemes (CDS). It is paramount to prioritise plans, policies and legislation that support and facilitate reverse logistics.
- » Given the challenges in banning plastic products due to reliance on imports (for example medical supplies), the introduction of container deposit legislation (CDL) has proven to significantly boost circularity. It is therefore essential to prioritise the introduction of CDL within the healthcare sector (GPs, CMC)
- » Implement a ceiling on and gradually decrease benchmarks for virgin plastics, along with objectives promoting the reusability and/or recyclability of plastic products. If appropriately calibrated, these caps and targets have the potential to render virgin plastics and new plastic products more costly than recycled alternatives and reusable plastic products.
- » Introduce sustainability criteria for plastic products to facilitate increased reusability, recyclability, and recoverability, thereby contributing to reduced associated costs.
- » Incorporate taxes on virgin plastics or implement tax differentials based on the sustainability levels of plastics and plastic products.

# Microplastics

- » Develop protocols aimed at minimising microplastics leakage at various stages of the supply chain, recycled waste management in needed to develop an effective regulatory process of microplastic exposure
- » Impose manufacturing restrictions prohibiting the intentional addition of microplastics in products.
- » Take into account particular regulations concerning microplastics, considering

the special difficulties they provide due to their overall presence and difficulty to remove.

- » Creation of informative factsheets elucidating the impact of plastics, including microplastics, on human

health and the environment.

- » Contemplate implementing restrictions on the import of primary microplastics and products that intentionally incorporate microplastics.

## Standardisation

- » Establish systems for environmental data collection and monitoring that offer dependable, easily accessible, and current information on waste patterns, pollutants, chemicals present in the natural environment.
- » Enhance local expertise for the processing and analysis of data and promote the exchange of technical capabilities and institutional agreements among government ministries and bodies. This collaboration is essential for sharing pertinent information necessary for well-informed decision-making.
- » Conduct routine checks on imported goods through audits for monitoring and enforcement of banned materials and plastics being phased out

- » Ensure adherence to (international) standards by obtaining third-party certification, including ISO, (eco-) labeling, and marking.
- » Establish mechanisms through well-executed monitoring and reporting systems that allow the public access to records, targets, and data.
- » Enact a unified set of standardised definitions to establish a harmonised system for monitoring, evaluating, and reporting.
- » Emphasise the need of eco-labelling to give consumers clear information so they can make educated decisions.



# Conclusion

This summary highlights the multifaceted challenges and provides opportunities associated with transitioning away from excessive plastic usage, particularly for Small Island Developing States (SIDS) like Curaçao. The full analysis ( please see the QR Code on the next page or visit [greenphenix.com](https://greenphenix.com)) reveals significant gaps in national legislation and policies concerning plastic pollution prevention, indicating a lack of adequate regulations and enforcement mechanisms. Addressing these gaps is crucial to safeguarding human health, protecting the environment, and advancing toward a cleaner, greener, and circular economy.

To effectively combat plastic pollution, Curaçao must actively engage at regional and international levels, including committing to a legally binding global

plastics treaty. Such a treaty would impose specific obligations and control measures across the entire lifecycle of plastics, complementing domestic legislation and policies. Efficient enforcement mechanisms are essential for the treaty's effectiveness, alongside robust implementation of recommended measures outlined in preceding chapters.

Addressing plastic pollution in Curaçao requires a comprehensive and collaborative approach encompassing legislative reforms, policy enhancements, and international cooperation. By proactively engaging with global initiatives and implementing targeted strategies, such as a ban on plastics entering the economy, Curaçao can mitigate the adverse effects of plastic pollution and transition toward a more sustainable future.



## *Full Report*

*This report is a summary to highlight the most important information from the full Gap Analysis.*

**You can find full 100-page report with detailed analysis, data and sources on Green Phenix website:**

**<https://greenphenix.com/gap-analysis>**