

ECOSOUM'S RECOMMENDATIONS TO POLICY MAKERS FOR SOLVING THE WASTE CRISIS

Ecosoum NGO recommends 14 main measures that, if wisely adopted and enforced, could turn Mongolia into a virtually zero-waste country within just a few years. These measures are intended to address the waste crisis as a whole, and not only plastic waste – although plastics are definitely the most problematic type of waste we have to deal with today.

For clarity purposes, we divided our 14 main recommendations into 4 categories:

1. recommendations to reduce waste and improve reusing;
2. recommendations to enable effective recycling;
3. recommendations to improve waste management systems on the field;
4. recommendations to enable financial sustainability of our waste management systems.

RECOMMENDATIONS TO REDUCE WASTE GENERATION AND INCREASE THE POSSIBILITY OF REUSING

1. All disposable products and packaging (both single-use and short lifespan items) **must be strictly and immediately banned** to reduce waste generation. All industries, starting with food and beverages companies,¹ must systematically switch to reusable packaging and organize reusable packaging take-back. For instance, it means that drinks like sodas should not be sold anymore in single-use plastic bottle, but should be marketed in reusable glass bottles, as it was the case just a few decades ago.² This is the only way to put an end to our throw-away society and finally embrace a zero-waste circular economy.

2. Packaging should be standardized by type of product for all companies and brands, to facilitate reusing processes (take-back, refill, etc.). Imagine how easy waste management could become if all drink bottles, all yogurt pots, all shampoo containers, had the same standardized dimensions. They would be so much easier to sort, clean and refill. Sure, advertising would be more complicated for brands; but, after all, would it be such a bad thing if people stopped being brainwashed all the time by the advertising industry? Are we buying products because they are quality and we truly need them, or are we buying them because the packaging looks so nice that we can't resist compulsive consumption? In any case, marketing issues are secondary and should always come after ecological and sustainability considerations.

3. Local goods production and shorter supply-consumption chains must be enabled and supported to reduce the need for packaging. If today our food and goods need so much wrapping, it is because most products travel the world in all directions and stay on shop shelves for weeks and

¹ According to Ecosoum's audit, up to 90% of household waste to be managed is actually food or beverage packaging, which means either bottles, jars, or different kinds of wrapping. See Ecosoum's "[Who Produces Our Waste?](#)" brand audit report (2022).

² Ecosoum, [Zero Waste And Circular Economy: The Way Forward](#) (2021).

months. So, of course they need a lot of 'protective' packaging. But if we produced and consumed our fresh food and quality goods more locally again, we wouldn't need so much packaging, and we wouldn't generate so much waste. It is important to emphasize that this switch would recreate many local jobs for unemployed people, especially in the countryside, which in turn would contribute to alleviating the socio-economic and environmental problems linked with overpopulation in Ulaanbaatar. In this perspective, supporting local cooperatives and local products would greatly contribute to solving both unemployment and waste-related problems.

4. While companies adapt their practices to reduce packaging and waste, **the population must also change its consumer habits**. We must consume less to generate less waste. And we must consume 'better', which means favoring long-lasting repairable products, sold without any useless wrapping, or with reusable packaging. As consumers, our choices alone are clearly not sufficient to change the world for the better; but our consumption patterns do send signals to companies. National policies should provide incentives for people to reduce over-consumption, or at least take measures against overwhelming advertisement that push people to over-consume and produce unmanageable waste.

RECOMMENDATIONS TO ENABLE EFFECTIVE WASTE RECYCLING AT A SYSTEMIC LEVEL

5. **Misleading uses of the word "recyclable" should be condemned and forbidden**. We usually hear that a lot of our waste is recyclable, but very often it is actually not true, because recycling, especially for plastic, has many limits. If we want to enable effective, sustainable recycling, we must make a clear difference between true 'recycling' and what we call 'downcycling'. For example, true recycling would mean turning an old PET bottle into a new one. With an old item, which has become waste, we make a new equivalent one: this way, we would close the loop of the circular economy and we don't need additional virgin natural resources. But this rarely happens. Usually, PET bottles are turned into something like sweaters, carpets, or any other lower-grade product that will quickly end their life in a dumpsite. With this kind of 'downcycling', we do turn a piece of waste into something new, but this new thing is usually of lower quality and not recyclable itself. This is not sustainable. But unfortunately, in today's Mongolia, we don't recycle anything; we only *downcycle*. Therefore, the national legislation should strictly regulate the use of the words "recyclable" and "recycled" in order to avoid consumers to be confused or misled.³

6. When products and packaging can honestly not be avoided nor be made reusable, national policies must **set the right conditions for recycling to be possible**. This notably means to promote priority use of truly and effectively recyclable materials, and strictly ban non-recyclable materials when a recyclable alternative exists. Overall, the range and number of materials used by packaging industries must be reduced, especially in terms of plastic types, and these few materials must be standardized to facilitate recycling processes. Designs that make effective recycling extremely complicated even when each of the materials that are used are theoretically recyclable – like multi-layer or multi-material packaging – must also be forbidden. Tetra Paks are a good example of this issue. They are

³ As explained in Ecosoum's *Zero Waste And Circular Economy* report, recent studies have shown that people tend to overconsume when they think - rightly or wrongly - that their product/packaging can be recycled.

made of carton, plastic and aluminum: in theory, all these materials are recyclable, but in practice no one can really recycle Tetra Paks, especially in Mongolia, because it is too complicated and expensive. Likewise, single-use sachets, which are not recyclable and are a terrible plague in Mongolia and all around the world, must be strictly forbidden.

7. Each company should have the responsibility to collect their waste (for instance, MCS should collect all its PET bottles, APU should collect its glass bottles, etc.) **and carry out by themselves effective reusing or recycling** of their waste (or find a subcontractor, if they prefer). True social responsibility of producers should imply that they are legally accountable and directly in charge of properly managing their waste rather than relying on the goodwill and efforts of others. It is not acceptable that large plastic producers let public administrations and small private recyclers take care of all the work, without any real support. If big polluters were accountable to recycle their waste, they would surely create the right conditions for effective recycling. But history shows that voluntary pledges and commitments by large corporations are more often used for greenwashing communication campaigns than followed by actual relevant actions. Therefore, public decision-makers should strictly reinforce the legal definition and effective enforcement of corporate 'social responsibility'.

RECOMMENDATIONS TO IMPROVE WASTE MANAGEMENT ON THE FIELD

8. Whether waste is reusable, recyclable or not really, one thing is sure: waste management systems and facilities need waste to be properly sorted. That is why **waste sorting should be mandatory and extensive for everyone**. This means not just for households at home, but also for all waste producers, especially industries, including in their production processes. We should always keep in mind that, on average, for each bag of garbage we generate at home, industries generated 70 more waste bags just to produce what is in our garbage bag.⁴ It means that even if individuals perfectly sort their waste at home, most of the actual waste remains to be sorted by industries upstream. Waste sorting should be a legal obligation, not a mild suggestion.

9. Relevant companies should organize and/or facilitate transportation of their reusable/recyclable waste from generation areas (ger districts, soums and aimags) to processing areas (reusing and recycling facilities in Ulaanbaatar). We often hear public administration be blamed for waste collection systems not working properly: of course, they don't work properly, because proper waste collection is way too expensive and complicated for municipalities if polluting companies don't chip in and participate. Whether within UB or from soums and aimags to UB, the vehicles supplying consumer-goods to shops should be used to bring back the associated waste to reusing and recycling facilities. Large companies like APU, MCS and so on should coordinate amongst themselves to mutualize efforts and expenses, and in any case, they should not let municipalities take care of everything for them. Here again, public decision makers cannot wait for corporation to implement such transportation on a voluntary basis: it should be made mandatory by law.

⁴ Worldwatch Institute (1994).

10. Relevant companies must alleviate their strict take-back rules, which currently compromises the ability of field waste workers to do their job properly. For example: in Bulgan aimag, waste workers recently collected and sorted many vodkas glass bottles, for a total of 4 million tugruks according to the official purchasing prices claimed by the company. But when they brought the bottles to UB, the company paid only 90,000 tugriks, alleging that there were too many scratches. This is not acceptable, because waste workers spent a lot of time and money to properly sort and transport this waste, and they just lost everything. Next time they won't bother sorting and they will put everything in the dumpsite. Under these conditions, local waste management systems, especially in the countryside, cannot be sustainable. That is why, even if there are scratches or damages, companies should alleviate their rules and buy back all their waste, so that local-level waste workers can do their job properly without risking bankruptcy. Of course, companies cannot reuse damaged bottles, but it should be their legal responsibility to make sure the broken glass is properly recycled and not abandoned in a dumpsite. Incidentally, bringing the responsibility back to companies will incentivize them to improve the reusability of their bottles.

11. Relevant companies should transparently collaborate with local stakeholders (ger district and soum administrations, CSOs like Ecosoum) **in establishing pilot waste management systems** consistent with the above-mentioned recommendations. This way, the best solutions for all stakeholders can be designed and experimented, before scaling up and replicating in the entire country. Public policies should frame such pilot approaches to make sure companies actually scale up their local accomplishments within a reasonable timeframe.

RECOMMENDATIONS TO ENABLE FINANCIAL SUSTAINABILITY OF LOCAL WASTE MANAGEMENT SYSTEMS

12. Decision makers should **increase public budgets** dedicated to waste management at the soum-level and **facilitate introduction of dedicated local taxes and/or contributions**. Although the current National law on waste could significantly be improved following these recommendations, in theory it already offers a relatively relevant regulatory framework for the countryside as the State sets a lot of standards and demands for soum administrations to organize proper waste management. But soum budgets are so small that it is virtually impossible to respect the Law... If waste management is a priority for the State, public budgets should definitely be increased to match the Law's ambitions and expectations.

13. That being said, State public budgets are undoubtedly limited and insufficient to solve all important problems. That is why **consumer-goods companies** that are at the origin of most waste (especially food and drink sector) **must contribute much more financially to support and balance local waste management budgets**. They should provide direct financial subsidies to khoroos, soums and aimags administration budgets. As I previously explained, companies should also systematize buy-back of all packaging from all their brands, whether it is reusable or recyclable and regardless of the condition, so that incomes from selling this sorted waste allows balancing local waste management budgets. And it is essential that these purchasing prices of recyclable/reusable waste are somehow indexed on gas prices and take into account distance between soums and purchasing points (so that financial sustainability is ensured even if gas price increases and even for remote

soums). National legislation should ensure that companies dedicate a reasonable percentage of their incomes to supporting public waste management systems.

14. Adequate reusing and recycling plants should be set up at the aimag-level, instead of centralizing all facilities in Ulaanbaatar. We spend too much money and emit too much greenhouse gases sending all countryside waste to Ulaanbaatar by truck. If there were proper recycling plants in aimag-centers, everything would be much easier, faster, and cheaper. Decentralizing waste management should also mean set up more production industries in aimags, to facilitate packaging (reduction and) reusing. For instance, if APU had vodka factories and MCS soda factories at least in some aimag-centers throughout the country, it would be easier to collect reusable and recyclable bottles, and these bottles would not be damaged during long transportation to Ulaanbaatar. Incidentally, embracing such a decentralizing approach would also recreate jobs in the countryside, and alleviate the demographic pressure on the over-crowded capital city. Everybody wins – even if it means that large companies make a little less profit for their shareholders.