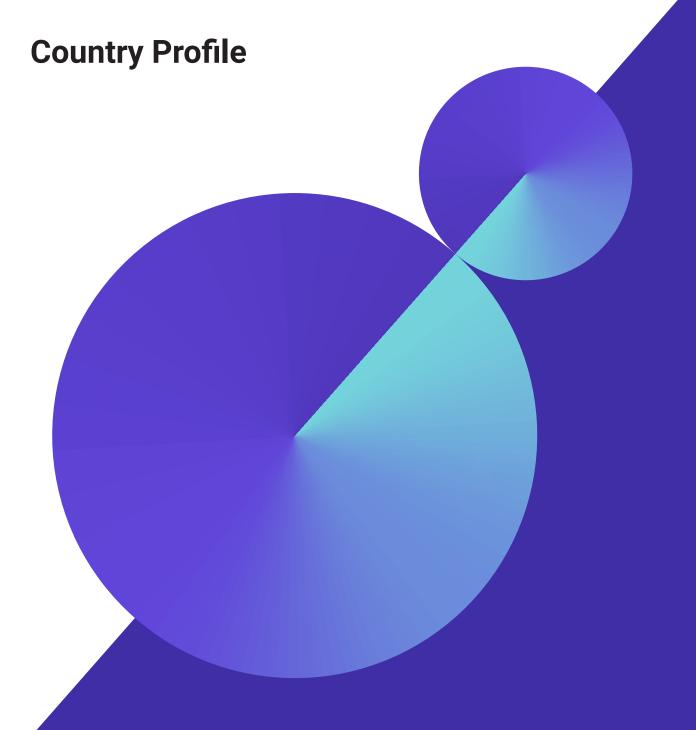


# PLASTIC POLICIES IN THE MALDIVES



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## **Table of contents**

1. Context	4
2. Policy landscape	6
3. Private-sector innovations	11
4. Challenges	13
5. Way forward	15
References	16
List of Figures and Tables ———	
Figure 1. Plastic waste in the Maldives in 2023	4
Figure 2. Plastic-related trade in the Maldives in 2022	5
Table 1. Overview of plastic-related policies in the Maldives	8
Table 2. Challenges related to plastic pollution in the Maldives	4.0

# **Abbreviations**

**EEZ** Exclusive Economic Zones

**EPR** Extended Producer Responsibility

**GDP** Gross Domestic Product

**Kg** Kilogram

MVR Maldivian Rufiyaa

MAWC Malé Aerated Water Company

MOPA Maldives Ocean Plastics Alliance

MRF Material Recovery Facility

NGO Non-Governmental Organisation

**NWMPS** National Waste Management Policy and Strategy

SIDS Small Island Developing States

**SUP** Single-Use Plastic

PET Polyethylene TerephthalateHDPE High-Density Polyethylene

### 1. Context

Estimates suggest that the Maldives produce approximately 19,800 metric tonnes of plastic waste annually (Earth Action 2024) or almost 37.9 kg per capita (Figure 1). The latter is 6 kg above the global average of 31.9 kg, and more than 17 kg above the average in SWITCH-Asia countries (20.1 kg). It is, however, important to highlight that many studies suggest that the largest share of plastic waste in Small Island Developing States (SIDS) such as the Maldives originates from other countries and is washed ashore from the oceans (Busch 2022).

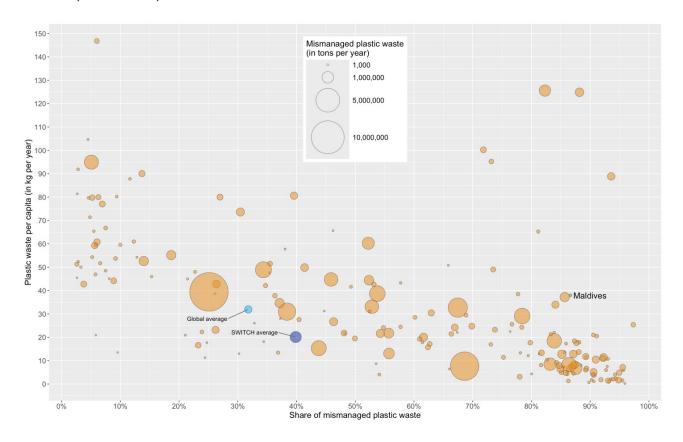


Figure 1. Plastic waste in the Maldives in 2023

Source: Earth Action 2024 data

Of the plastic waste generated in the Maldives, 87 per cent or 17,200 metric tonnes are mismanaged, amounting to 32.9 kg per capita per year. The per capita ratio is almost three times higher than the global average of 12.5 kg per capita and the SWITCH-Asia countries' average of 12.2 kg per capita. It is known that open burning is a common practice in the Maldives and that the official landfill on the island of Tilafushi is prone to leakage of plastics and other wastes into the sea.

Rank of the Maldives in global comparison (out of 192)		
Plastic waste in metric tonnes	37	
Plastic waste per capita (kg/year)	125	
Mismanaged plastic waste in metric tonnes	50	
Mismanaged plastic waste per capita (kg/year)	184	
Rank of Maldives in mismanaged plastic waste	148	

There is little economic activity related to the upstream in the plastics lifecycle: neither is there an oil and gas industry in the Maldives nor a production of primary plastics or chemicals. Plastic-related trade data show that there is also no noteworthy manufacturing of plastic products from primary plastics and related raw materials in the Maldives. In sum, plastic-related trade amounts to roughly US\$ 144.000 of exports and almost US\$ 141 million of imports (Figure 2). Intermediate and final manufactured plastic goods account for 80 percent of all imports, whereas products needed for the manufacturing of plastic products only account for 12 percent of imports. The data also reveals that the Maldives export plastic waste worth roughly US\$ 144,000. Overall, the Maldives' plastic-related trade accounts for less than 0.01 per cent of the global plastic-related trade with the Maldives on rank 143 of 172.

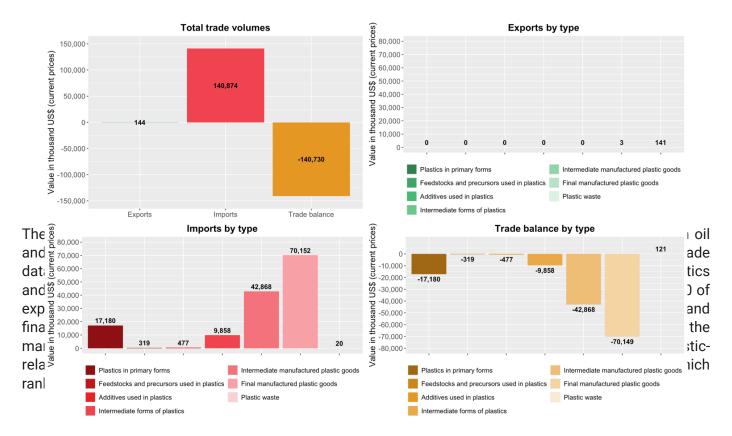


Figure 2. Plastic-related trade in the Maldives in 2022

Source: UNCTAD data

# 2. Policy landscape

There are several laws, regulations and policies that are relevant for the tackling of plastic pollution in the Maldives. As becomes visible in the overview on policies in Table 1, they include measures specifically and directly targeting plastic pollution as well as more generic measures on waste management that also affect plastic pollution. Measures include both command-and-control laws and regulations as well as market-based mechanisms. Likewise, they cover most stages of the plastics life-cycle and trade. Only the consumption of plastics is not directly regulated by any of the laws, regulations or market-based approaches. Since many of the policies potentially also directly or indirectly affect consumer choices and behaviour, this should not be considered a gap.

On paper, the most restrictive **command-and-control policy** is the Single-use Phase-out Plan because of its focus on banning. It was initiated in 2021 by the Presidential Decree on Single-use Plastic (SUP). Like most countries, the Maldives target the most problematic plastic products in this plan, i.e. products that are designed to be used once before being discarded, thus creating an unnecessary burden on the fragile waste management system. The plan as well as further enactment of Presidential Decrees specify products and set dates from which their import, production and consumption will be banned nationwide (Government of the Republic of Maldives 2021). While the original plan as well as the first Presidential Decree envisaged timely deadlines for the banning of most of the outlined SUPs¹, many of the deadlines originally set for 2021 and 2022 were extended by three consecutive Presidential Decrees and now range from dates in 2022 to 2024. The ambitious plans, thus, have so far not been fully implemented or enforced.

In addition, the SUP phase-out plan introduces several **market-based instruments**.

- A 400% tariff on PET raw materials, empty PET bottles and mineral water in PET packaging, balloons and other plastic decorations, as well as plastic bags
- Duty exemptions for non-plastic or reusable alternatives
- A 2 MVR (~US\$ 0.13) levy on plastic shopping bags and plastic sachets
- A financial feasibility study for a Material Recovery Facility (MRF), with the long-term aim to establish an extended producer responsibility (EPR) scheme (Government of the Republic of Maldives 2021).

Although a feasibility study for the MRF (adelphi 2023) concluded that an EPR in the Maldives would be theoretically feasible but would also require a vast amount of further information, there is no evidence that the tariffs, duty exemptions or the levy have yet been enacted.

In addition, the Maldives enacted legislation focusing on overall waste management that also affects the management of plastic waste. Some laws, such as the Environmental Protection and Preservation Act (Government of the Republic of Maldives 1993) cover waste aspects rather broadly. Others, such as the Regulation on the Protection and Conservation of Environment in the Tourism Industry (Government of the Republic of Maldives 2006) target only one specific sector and its waste management. Still others, like the National Waste Management Policy (Government of the Republic of Maldives 2015) and the more recent Waste Management Act (Government of the Republic of Maldives 2022) have a clearer focus on plastics. Both aimed at improving the management of (plastic) waste but stayed far behind their level of ambition. As a reaction, the government has commissioned a project to develop a National Waste Management Policy and Strategy (NWMPS) for the years 2023 to 2027. This strategy, though not finally accepted, sets out to follow the waste hierarchy, namely to prioritise reduction before reuse, recycling, energy recovery and disposal (in decreasing order of preference) (Tavoularis et al. 2023).

<sup>1</sup> Including straws, plates, cutlery and stirrers, Styrofoam lunch boxes, plastic shopping bags below 30x30 cm and below 50-micron thickness, sweet areca nuts in plastic wrapping or in other plastic packaging, small plastic drinking cups, cotton buds with plastic stems, toiletries in plastic bottles below 50 ml (up to 200 ml in 2024), water in plastic bottles below 0.5 litre (and below 1 l in 2024), and other beverages in plastic bottles below 0.5 l.

In terms of **information measures**, the Waste Management Act (Government of the Republic of Maldives 2022) emphasises the importance of awareness raising and capacity development. It mandates public education campaigns to promote sustainable waste management practices and the benefits of waste reduction, reuse and recycling. The Act also calls for training programmes to build the capacity of individuals and organisations involved in waste management, ensuring they are equipped with the necessary skills and knowledge. Additionally, it proposes regular workshops and seminars for continuous professional development, keeping stakeholders updated on new regulations, technologies and best practices. This approach aims to foster a knowledgeable and engaged community that actively participates in sustainable waste management.

Another information measure regarding capacity development and information is the Government's national campaign to reduce single-use plastics as part of its commitment to the UN Environment CleanSeas campaign. The campaign calls on governments to pass policies to reduce plastics, industries to minimise plastic packaging and consumers to reduce plastic use (UNEP 2017). Similarly, the Maldives Ministry of Environment, Climate Change and Technology's efforts to increase fees on plastic bags are is seen as an essential step in raising awareness about the environmental costs of plastic consumption (UNDCO 2024).

Overall, the Maldives pursue a reasonable policy approach in combating plastic pollution. The focus of the government on tackling imported single-use plastic products seems to be very sensible because there is no production in the country of primary plastic polymers or feedstock thereof, and that single-use plastic products are more frequently littered than other plastic products. Ongoing initiatives and plans to improve the existing waste management legislation and practices prove that there is an understanding at the political level that these actions (among others) are needed to sustainably manage plastic waste.

Whether the planned building of a "waste to energy" facility can be considered a sustainable long-term solution is debatable. Similarly, the continued postponement of the enactment of different stages of the SUP ban shows how important it is for legislators and policy makers to be aware of the existing and necessary infrastructure and other capacities to monitor and enforce such bans.

At the global level, the Maldives would certainly profit from the different upstream measures currently discussed during the negotiations for a global plastics treaty, whilst facing little to no negative impacts. Fewer amounts of plastics being produced would make alternatives more viable and potentially cheaper. Fewer problematic and unnecessary products globally would make it more acceptable for tourists to forgo them during their holidays. Fewer hazardous chemicals in products would have health benefits and reduce negative impacts to the aquatic environment as well as to waste workers.

### Table 1. Overview of plastic-related policies in the Maldives

Source: Authors' own representation

	Production (primary polymers)	Manufacturing (plastic products)	Consumption	Waste management/ End-of-life	Trade	
	COMMAND AND CONTROL					
Mandatory performance/outcome standards (incl. targets)		Standard for classification of Biodegradable Plastic Bags (2012)		Waste Management Regulation (2013)		
Mandatory process standards (incl. targets)						
Technological standards (incl. targets)						
Prohibitions/bans (incl. phaseout)	Presidential Decree on Single- use Plastic (2021, 2022, 2023)	Presidential Decree on Single- use Plastic (2021, 2022, 2023)		Environmental Protection and Preservation Act (EPPA, 2019)     Regulation on the Protection and Conservation of Environment in the Tourism Industry (2006)     National Waste Management Policy (2015)     Waste Management Act (2022)	18th Amendment Bill to the Import-Export Act (2020, prohibiting import of specific SUP)     Presidential Decree on Single-use Plastic (2021, 2022, 2023)	
		MARI	KET-BASED			
Taxes/levies		Plastic Bag Fee for GST Registered Bodies (2023)			Single-use Plastic Phase- out Plan 2020-2023 (2021) foresees a 400% tariff on	
					PET raw materials (2021)	
					<ul> <li>Empty PET bottles and mineral water in PET packaging (2021)</li> <li>Balloons, plastic balloon</li> </ul>	
					sticks and SUP party decorations (2022) single- use plastic shopping bags.	

	Production (primary polymers)	Manufacturing (plastic products)	Consumption	Waste management/ End-of-life	Trade
Subsidies/grants/tax reductions			Single-use Plastic Phase-out Plan 2020-2023 (2021)		Single-use Plastic Phase-out Plan 2020-2023 (2021)
Public procurement					
EPR/deposit refund schemes		Planned/ under development: EPR scheme for plastics and packaging (Part 4 of the Single-use Plastic Phase-out Plan) The December 2022 ratified Waste Management Act included a deadline to specify the legislation on EPR including the type of packaging and stakeholders falling under the scheme. A draft for public comments on specific EPR regulation was released in February (with deadline of 13th February). The regulation is still under revision and has not yet been enacted.			
Liability schemes					
		INFO	RMATION		
Taxonomies					
Data collection, reporting and disclosure					
Labels					
Awareness raising/ capacity development			<ul><li> UNEP CleanSeas Campaign</li><li> Plastic Bag Fee Initiative</li></ul>	Waste Management Act (2022)	

	Production (primary polymers)	Manufacturing (plastic products)	Consumption	Waste management/ End-of-life	Trade	
	GOVERNANCE/COORDINATION					
Roadmaps, plans and strategies		Single-use Plastic Phase-out Plan 2020-2023 (2021)	Single-use Plastic Phase-out Plan 2020-2023 (2021)	Planned/under development: Revision of National Waste Management Policy and preparation of a National Waste Management Strategy for 2023-2027	Single-use Plastic Phase-out Plan 2020-2023 (2021)	
Alignment between policies and plans in addressing plastic pollution is needed: Efforts to promote circular economy approaches, such as reducing plastic waste, are contradicted by projects like waste-to-energy plants, which do not align with circular principles. Harmonisation of new policies is needed with existing initiatives. E.g., the Single-use Plastics Phase-out Plan bans certain plastic bottles, which conflicts with the EPR system that aims to recycle these bottles. Overall, inter-ministerial cooperation and coordination could be streamlined.					policies is needed with existing	
Public-Private partnerships						
	SPECIAL FOCUS SECTOR: TOURISM					
In the tourism sector, opportunities exist to enhance regulations, raise awareness, and improve knowledge sharing, which would contribute to better waste management in the Maldives.						
The related "Regulation on the Protection and Conservation of Environment in the Tourism Industry (2006) provides a solid foundation for environmental protection in the tourism sector, including some measures that address plastic pollution. The regulation requires segregation of plastic waste and prohibits the open-air burning of plastic waste. There is room for more specific and targeted legislation to address the growing concern of plastic waste in tourism.						
	Voluntary actions in this sector include:					
	<ul> <li>One resort (Fairmont) prohibited single-use plastics (SUPs) on its island</li> <li>Other resorts on the islands have their own glass-bottle refilling stations and circles, thus replacing bottled water in PET bottles.</li> </ul>					

#### 3. Private-sector innovations

The tourism sector is actively implementing measures that reduce its plastic consumption. Many large tourism resorts, situated on their own islands, have replaced purchased water in single-use plastic bottles with their own water in glass bottles. To this end, they established water bottling plants utilising reverse osmosis and desalination. This water is then filled in glass bottles, which are sterilised and refilled on-site. This strategic move has not only ecological benefits by significantly reducing the consumption of single-use plastic bottles and the accumulation of resulting plastic waste, it also cuts operational and environmental costs and comes with logistical advantages. Moreover, it substantially reduces transportation costs associated with import of bottled water and waste disposal.

Taking it a step further, Soneva, a prominent hotel resort, has spearheaded an initiative through its NGO, Soneva Namoona. This initiative establishes community-run water bottling plants on neighbouring non-resort islands such as Maalhos in Baa Atoll and Kudafari in Noonu Atoll. These plants supply reusable glass bottles filled with purified water to local cafes, guesthouses and households, fostering a returnable glass bottle system at the community level. This approach not only benefits the environment but also empowers local communities by promoting sustainability and reducing dependency on single-use plastics (Soneva n.d.). In addition to these efforts, Soneva Namoona has introduced several innovations for enhanced waste management on Maldivian islands. A noteworthy achievement occurred in December 2021 when the seven Namoona partner islands in Baa Atoll launched a recyclable-waste-collection boat. This vessel collected 50 metric tonnes of segregated, compacted and baled recyclable waste, demonstrating the significant impact of inter-island collaboration and support in waste management practices (Soneva 2021). Many other resorts follow a similar approach and engage with innovative waste management activities on Maldivian islands.

Other resorts pursue an even more ambitious and comprehensive approach in combating plastic pollution. Fairmont, for example, prohibited single-use plastics on the island and is now sourcing amenities, such as shower gel or food items in bulk. Moreover, Fairmont boasts a unique sustainability lab where plastic waste, whether brought in by guests or washed up on the coast, is repurposed into small souvenirs. Remarkably, as of 2023, this initiative has transformed 3,400 kg of plastic waste (Coral Glass 2022).

Given that tourism significantly contributes to plastic pollution in countries such as the Maldives where tourism is a major source of national income (UNEP/WTCC 2021), these initiatives are small but important steps to tackle plastic pollution. In the Maldives, for example, tourists generate up to three times more waste than residents (see next section). Scaling up such initiatives and motivating more hotels, resorts and other tourism businesses to join voluntarily or in response to regulatory incentives or pressures would therefore certainly help reduce plastic pollution in the Maldives, at least from the tourism sector.

Beyond the tourism sector, other private businesses are also acting to address plastic waste in the Maldives. Coca-Cola, for example, runs three practical initiatives. First, it has established collaborations with local organisations dedicated to tackling plastic waste through its local bottling partner, Malé Aerated Water Company (MAWC). Second, as a partner of the Maldives Ocean Plastics Alliance (MOPA), Coca-Cola also actively participates in its Plastic Reverse Logistics Project and Island PET Collection Project, and serves as the exclusive partner in MOPA's Resort PET Collection initiative. This initiative was launched in December 2021 to recycle empty PET bottles from tourism resorts by handing over the collected bottles to Parley Maldives (Coca-Cola Company 2022). Third, Coca-Cola, together with MOPA, implemented an initiative on Kudahuvadhoo in the Dhaalu Atoll where bins and gunny bags were provided to households to segregate waste into four main categories: organic waste, plastics, metal and glass, and mixed waste. In this initiative, Coca-Cola is also the logistics partner to transport the collected PET bottles from Kudahuvadhoo to capital Male to hand it over again to Parley who then export the waste overseas for recycling (Coca-Cola Company n.d.).

While such voluntary initiatives of producer responsibility are important, they best tackle plastic pollution if more companies and sectors engage in such initiatives. Here, the planned mandatory EPR on plastic packaging would certainly help to scale up producer responsibility and improve the plastic waste management.

# 4. Challenges

The Maldives, as a Small Island Developing State (SIDS), faces unique logistical challenges due to its vast Exclusive Economic Zones (EEZ) primarily composed of sea, with only a fraction of land area. The scattered nature of the islands complicates logistics, particularly making the transport of waste expensive. Exporting recyclables from the Maldives proves unprofitable due to significant bottlenecks in logistics and the high cost of collection. Moreover, the country's geographic isolation and small population hinder economies of scale, resulting in imported goods being cheaper than domestic products.

The tourism industry, a major economic driver contributing more than a fourth of the GDP, exacerbates the waste generation issue. Waste generated in tourist resorts averages 3.5 kg per guest per day, significantly higher than the 0.8 kg to 1.7 kg per day for residents of Male and the surrounding islands (Moosa 2021). Despite efforts by resorts to combat plastic waste accumulation, the government's decentralisation processes have led to concerns among resorts. There is a prevailing sentiment that individual efforts are futile if waste ultimately ends up mixed and incinerated on Thilafushi.

A summary of the challenges present in the Maldives is given below.

Table 2. Challenges related to plastic pollution in the Maldives

Source: Authors' own representation

Challenges	Description
Geographic/ demographic	<ul> <li>In the Maldives, the 90,000 km<sup>2</sup> of Exclusive Economic Zone encompasses 99.6% sea and only 298 km<sup>2</sup> of land</li> </ul>
	The ocean provides the vast majority of the Maldives´ natural resources
	<ul> <li>Vast distances between the scattered islands result in high costs for waste collection, transportation and treatment</li> </ul>
	<ul> <li>Stark differences in terms of population and waste management needs/ capacities exist between the capital Male and the islands used for tourism resorts</li> </ul>
	<ul> <li>Isolation from international markets often makes waste treatment technologies (or export of waste for recycling) too expensive</li> </ul>
	Small populations on islands prevent economies of scale in waste treatment
	<ul> <li>Largest share of plastic waste originates elsewhere, leaks into oceans and is then washed ashore on the coasts of the Maldives.</li> </ul>
Reliance on imports	<ul> <li>Unique geographic characteristics lead to heavy reliance on imports such as food, fuel and other raw materials for industries, and makes self-sufficiency and economies of scale impossible to achieve</li> </ul>
	<ul> <li>In the Maldives, imports were 91% of national trade in 2020 due to limited resources within the country's borders and lack of land for agricultural production</li> </ul>
	<ul> <li>Reliance on imports makes the country is vulnerable to exogenous economic shocks.</li> </ul>

#### Reliance on Tourism is one of the major economic activities and main driver of development tourism (25.2% of the GDP and more than 1/3<sup>rd</sup> of government tax revenue comes from the tourism industry) Heavy reliance on tourism also increases imports of goods, and subsequent increase in waste generation Regulations are currently insufficient; addressing this and building awareness and knowledge exchange among tourism sector stakeholders would be important for improving waste management. Awareness and information among stakeholders on proper disposal needs Waste Management improvement · Awareness among stakeholders of the principles of reduce, reuse, recycle and repurpose needs improvement High transport costs and lack of space lead to open burning and dumping practices Low level of segregation at household and industry level Unavailability or unsuitability of technologies to improve waste management systems Stark differences in waste management needs between Male, the island resorts and Tilafushi. Technical and financial capacity to establish a strong waste management Institutional system within the country is needed Important information and data needs to be made publicly available Producer/importer registry for disclosure of important data to be set up Inter-ministerial exchange needs to be promoted Governance, monitoring and enforcement capacities need support.

Despite implemented policy measures and existing awareness programmes, the aforementioned challenges persist. Expertise and specific knowledge in waste management are needed, as well as government guidelines for implementing regulations. Moreover, low data transparency and low trust in the efficacy of recycling processes after waste shipment to Thilafushi currently discourage adherence to segregation measures and innovative solutions.

Complicating matters further are insufficiently aligned policies and plans. For example, on the one hand there is a clear effort to promote more circular economy approaches to reduce plastic pollution. On the other hand, the simultaneous pursuit of a waste-to-energy plant project cannot be considered a circular solution. It might, however, provide a technological approach for the transition period until more circular solutions become widespread and effective in the Maldives. Additionally, it is essential to better align proposed new policies, such as an Extended Producer Responsibility scheme with existing mechanisms. For instance, the Single-Use Plastic Phase-out Plan bans certain sizes of plastic bottles. This appears misaligned with the planned EPR system for plastic packaging that would otherwise recycle these bottles.

# 5. Way forward

Moving forward, addressing the issue of plastic pollution in the Maldives requires a multifaceted approach encompassing various measures. First, in order to develop targeted waste management policies, there is an urgent need for comprehensive data collection mechanisms to accurately quantify the extent of plastic pollution and mismanaged plastic waste in the country. This includes gathering data on production, consumption, waste generation and recycling rates to inform evidence-based policy decisions. Concurrently, substantial investments in waste management infrastructure are imperative to facilitate the efficient collection, segregation and processing of plastic waste. This entails expanding recycling facilities, improving landfill management practices and deploying advanced technologies for waste treatment.

#### How could the Global Plastics Treaty help?

- Facilitate data collection through its provision on transparency, tracking, monitoring and labelling
- Decreasing volumes of plastic waste by obliging countries to reduce production of primary plastic polymers
- Providing funds for investments into waste management by raising financial resources through its financial mechanism
- Support introduction of EPR through provision for and guidance on EPR
- Enhance capacities and strengthen regulatory framework through its support for capacity-building initiatives and technical assistance
- Fostering international collaboration through its provisions on international cooperation, information exchange and technology transfer
- Stimulate awareness-raising, education and research through its provisions on these issues.

Capacity building initiatives aimed at enhancing expertise in waste management practices among government officials, local authorities and communities are crucial for the effective implementation of waste management strategies. This may include the implementation of rigorous public procurement policies that prioritise environmentally friendly and sustainable products, such as goods with minimal plastic content or those made from biodegradable materials. Strengthening the regulatory framework in a coherent way is essential, necessitating the development and particularly the enforcement of regulations that comprehensively address plastic pollution across all stages of the plastic lifecycle, from production to disposal. This includes, for example, the establishment of a financially viable EPR scheme to hold importers and manufacturers accountable for their products' end-of-life management. In this regard, ensuring policy alignment and timely implementation of measures are critical to addressing plastic pollution urgently and establishing a sustainable and resilient waste management system in the Maldives. Furthermore, fostering international collaboration with neighbouring countries, global initiatives and international organisations is essential to exchange knowledge, resources and best practices in plastic waste management.

Recommending **public awareness campaigns** to educate the public about the environmental impacts of plastic pollution, proper waste disposal practices and the importance of waste reduction, reuse and recycling are paramount. In this regard, **community engagement initiatives**, such as beach clean-ups and incentivised waste segregation schemes can empower local communities to actively participate in waste management efforts. This includes integrating comprehensive environmental **education** into the curricula of **schools and universities** to foster a generation of environmentally conscious citizens. Along the same lines, the introduction of clear and informative **labelling** on products can empower consumers to make environmentally responsible choices. Labels that highlight the environmental impact of products, including their plastic content and recyclability, will guide consumers towards more sustainable options and will facilitate the collection for finally recycling of products according to their material content.

Lastly, encouraging **knowledge and technology transfer** in sustainable waste management technologies and promoting public-private partnerships to implement effective waste management strategies are additional recommendations.

More generally speaking, establishing exchanges and collaborations with other Small Island Developing States can provide valuable insights and shared experiences that are more relevant to the Maldives' unique context than those of larger Asian countries. SIDS face similar challenges regarding plastic pollution, and by working together, they can develop tailored solutions that address their specific needs and circumstances.

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