



Japan Machinery Center
for Trade and Investment

24th September 2026

Mr. Hope Smith Lomotey
Director of Human Settlement
Environmental Protection Authority
Executive Management Office
Via Email: info@epa.gov.gh

Subject: JMC Comments on the Environmental Protection Authority's Announcement on the Ban on Polystyrene Foam Products

Dear Director Hope Smith Lomotey,

The Japan Machinery Center for Trade and Investment (“JMC”) is a non-profit organization serving the character of a public-interest corporation. It was established in December 1952 in accordance with the Japanese Export and Import Trade Law with the authorization of the Minister of Economy, Trade and Industry of Japan. The objective of the JMC is to enhance the common benefit of its member companies and to promote the sound development of international trade and investment in the machinery industry.

JMC is composed of member companies engaged in machinery and systems-related exports and foreign investment activities, including machinery manufacturers, trading houses and engineering companies. At present, JMC has approximately 240 member companies.

Our committee handles environmental and product safety issues related to products for trade and is strongly concerned with overseas environment- and product safety-related regulations on products.

We have reviewed the announcement issued by the Environmental Protection Authority (EPA) on 25th May 2026 regarding the ban on polystyrene foam products.

EPA Announcement:

[Press Statement: EPA Announces Ban on Polystyrene Foam Products](#)

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With the aim of ensuring that this measure is both practical and effective for regulatory authorities as well as industry stakeholders, we would like to respectfully submit JMC's comments for your consideration.

If you have any questions, please feel free to contact our secretariat: Ms. Akari Shiga, E-mail: shiga@jmcti.or.jp.

Sincerely yours,

Chairman
Environment Law Committee



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EPA Announcement

[Press Statement: EPA Announces Ban on Polystyrene Foam Products](#)

We place great importance on the protection of human health and the environment. We actively promote voluntary initiatives to reduce environmental impacts throughout the entire product life cycle, while also striving to comply with regulations relating to e-waste, packaging, batteries, and other waste streams in the countries and regions where we operate.

Based on our industry's experience in these areas, we have carefully reviewed the EPA's announcement. With the aim of ensuring that this measure is both practical and effective for regulatory authorities as well as industry stakeholders, we would like to respectfully submit the following comments for your consideration.

The purpose of this letter is to comment on the 25th May 2026 announcement made by the Environmental Protection Authority regarding the ban on polystyrene foam products.

According to the announcement, the use of expanded polystyrene (EPS) foam products, including packaging and cushioning materials, is banned from 1st January 2027.

Our member companies are energetically committed to protecting the environment and reducing packaging waste worldwide. However, EPS cushioning materials play an essential role in protecting many heavy electronic products, such as large screen televisions, as well as fragile and precision equipment, such as broadcasting and medical devices, from breakage during long distance transportation.

With current technology, it is extremely difficult to identify alternative materials that can provide the same level of protection and shock absorption as EPS for heavy electronic equipment and fragile precision equipment products.

Even in some cases where there are such alternative materials, they generally require larger packaging dimensions of material to achieve a protective performance comparable to EPS. As a result, there is concern that their use could lead to increased greenhouse gas emissions associated with transportation.

For these reasons, if the use of EPS cushioning materials were to be prohibited, there is a significant risk that the export of heavy electronic equipment and the precision equipment products we manufacture to Ghana may no longer be technically or economically feasible.

The announcement states that the purpose of this measure is to support a transition to safer, reusable, recyclable and environmentally sustainable alternatives. We recognize the need to address the environmental impacts caused by polystyrene foam waste that is improperly discarded in public spaces in Ghana. However, such measure should be balanced with the need to continue providing heavy and precision products to consumers in Ghana.

The note in the notice states that the prohibition excludes EPS products specifically intended for medical, scientific, laboratory and diagnostic purposes.

We would respectfully request that the EPA also clarify that EPS cushioning materials used for electronic products, as well as fragile or precision equipment requiring a high level of protection during transportation, are likewise exempt from the scope of the EPS ban.

End