

Response ID ANON-NTSF-3RAH-9

Submitted to Consultation on proposals to ban commonly littered single-use plastic items in England
Submitted on 2022-02-10 14:37:23

Introduction

1 Would you like your response to be confidential?

No

Blank free text box for answer:

2 What is your name?

Name:
Laura Foster

3 What is your email address?

Email:
laura.foster@mcsuk.org

4 It would be helpful for our analysis if you could indicate which of these sectors you most align yourself/your organisation with for the purpose of this consultation (please tick the one which is most applicable to you):

non-governmental organisation

5 If you are responding on behalf of an organisation, what is its name?

Organisation:
Marine Conservation Society

Proposals

Questions

6 Do you agree or disagree with the proposed definition of plastic?

Disagree

Blank free text box for answer:

We support the inclusion of the widest scope of material to prevent regrettable substitution occurring and ensure we don't see the same environmental impact from similar material.

As outlined in the Eunomia report in 2020:

"products made from unmodified natural polymers that cannot currently be shown to perform substantially differently in the environment would avoid regulation and this could severely undermine the effectiveness"

https://www.eunomia.co.uk/wp-content/uploads/2020/01/What-is-Plastic-Summary_Final.pdf

This is particularly noticeable within the context of wet wipes and ensuring that it is future proof for any potential legislation in this regard. As the Eunomia report 2020 states that there is the challenge that for lyocell and viscose, current standards can not provide confidence that "materials that pass into the marine environment will not have a similarly detrimental impact as a synthetic plastic product."

Notably studies in UKOT have found that two-thirds of mesopelagic fish contain microfibrils and "Anthropogenic fibers were common especially viscose, a semi-synthetic material which is associated with sanitary products as well as other items"

<https://www.frontiersin.org/articles/10.3389/fmars.2021.633478/full>

7 Do you agree or disagree with the proposal to introduce a ban on the supply of the following single-use items in England?

Agree with introducing bans - Plastic plates only:

Agree with introducing bans - Plastic plates, including plastic bowls:

Agree with introducing bans - Plastic plates, including plastic trays:

Agree with introducing bans - Plastic plates, including plastic bowls and plastic trays:

Agree

Agree with introducing bans - Plastic cutlery:

Agree

Agree with introducing bans - Plastic balloon sticks:

Agree

Agree with introducing bans - EPS food containers:

Agree

Agree with introducing bans - EPS beverage containers:

Agree

Blank free text box for answer:

8 We propose that the ban should cover all bio-based, compostable, and biodegradable plastic (such as PLA). Please tick in the table those plastics you support the ban including.

Bio-based, compostable, biodegradable - Plastic plates:

All

Bio-based, compostable, biodegradable - Plastic cutlery:

All

Bio-based, compostable, biodegradable - Plastic balloon sticks:

All

Bio-based, compostable, biodegradable - EPS food containers:

All

Bio-based, compostable, biodegradable - EPS beverage containers:

All

Text box:

We do not want to see one single use item being replaced by another single use item made of different material as this does not support a move to a circular economy. Furthermore there are currently no compostable or biodegradable materials which have been tested and shown to be appropriate in all marine settings e.g. deep sea, anoxic.

9 Do you agree or disagree with the proposal to exclude from the ban a) plates used as packaging or b) plates used as packaging except those used in eat-in settings?

Exclude packaging - Exclude plates used as packaging:

Disagree

Exclude packaging - Exclude plates used as packaging, with the exception of those used in 'eat-in' settings:

Disagree

Blank free text box for answer:

There is a need to move to prioritise prevention of waste and this is in line with the waste hierarchy.

Impact on alternatives to banned items

10 Do you currently supply customers with any of the items we are proposing to ban?

No

Impact of alternatives to banned items

12 Are there any risks that alternatives to plastic plates, plastic cutlery, plastic balloon sticks, EPS food containers, and EPS beverage containers will themselves have significant environmental impacts?

Risk of alternatives having environmental impacts - Plastic plates:

Yes

Risk of alternatives having environmental impacts - Plastic cutlery:

Yes

Risk of alternatives having environmental impacts - Plastic balloon sticks:

Yes

Risk of alternatives having environmental impacts - EPS food containers:

Yes

Risk of alternatives having environmental impacts - EPS beverage containers:

Yes

Blank free text box for answer:

It is important to recognise that we need to move to the use of reusables rather than continue with alternative single use items. As outlined in the impact assessment for instance, paper plates and woodern cutlery are "the expected alternatives" generating 107 tonnes CO2e over a 10 year period. We were disappointed to see that calculations on the impact assessment of reusable items had not been included.

Exemptions

13 Will any of the proposed item bans have a negative impact on certain people? If yes, why. Please tick all boxes that apply.

Will any of the proposed item bans have a negative impact on certain people? - Plastic plates:

No

Will any of the proposed item bans have a negative impact on certain people? - Plastic cutlery:

No

Will any of the proposed item bans have a negative impact on certain people? - Plastic balloon sticks:

No

Will any of the proposed item bans have a negative impact on certain people? - EPS food containers:

No

Will any of the proposed item bans have a negative impact on certain people? - EPS beverage containers:

No

Blank free text box for answer:

While we do not foresee any issues with these materials being banned however, we recommend consultation with the relevant and appropriate groups.

14 Should there be any exemptions from any ban for the following items e.g., in certain locations or for particular purposes?

Should there be any exemptions from any ban? - Plastic plates:

No

Should there be any exemptions from any ban? - Plastic cutlery:

No

Should there be any exemptions from any ban? - Plastic balloon sticks:

No

Should there be any exemptions from any ban? - EPS food containers:

No

Should there be any exemptions from any ban? - EPS beverage containers:

No

Blank free text box for answer:

Timing of the ban

15 Our proposed date for the ban on single-use plastic plates, plastic cutlery, plastic balloon sticks, EPS food containers, and EPS beverage containers is April 2023. We think this will allow sufficient time for industry to use up existing stock and source alternatives where needed. Do you agree or disagree that this date will give industry sufficient time to prepare for the ban? E.g., sourcing alternative products, using up existing stock.

Timing of the ban - Plastic plates:

Agree

Timing of the ban - Plastic cutlery:

Agree

Timing of the ban - Plastic balloon sticks:

Agree

Timing of the ban - EPS food containers:

Agree

Timing of the ban - EPS beverage containers:

Agree

Blank free text box for answer:

Impact assessment

16 Do you agree or disagree with our estimations that in 2018, 20 single-use plates, 75 pieces of single-use cutlery, 3 EPS boxes, 8 EPS cups, 6 EPS pots and 3 EPS trays and cones were consumed per person in England?

Do you agree or disagree with our estimations that in 2018, 20 single-use plastic plates, 75 pieces of single-use plastic cutlery, 3 EPS boxes, 8 EPS cups, 6 EPS pots and 3 EPS trays and cones were consumed per person in England? - Plastic plates:

Don't know

Do you agree or disagree with our estimations that in 2018, 20 single-use plastic plates, 75 pieces of single-use plastic cutlery, 3 EPS boxes, 8 EPS cups, 6 EPS pots and 3 EPS trays and cones were consumed per person in England? - Plastic cutlery:

Don't know

Do you agree or disagree with our estimations that in 2018, 20 single-use plastic plates, 75 pieces of single-use plastic cutlery, 3 EPS boxes, 8 EPS cups, 6 EPS pots and 3 EPS trays and cones were consumed per person in England? - Plastic balloon sticks:

Don't know

Do you agree or disagree with our estimations that in 2018, 20 single-use plastic plates, 75 pieces of single-use plastic cutlery, 3 EPS boxes, 8 EPS cups, 6 EPS pots and 3 EPS trays and cones were consumed per person in England? - EPS food containers:

Don't know

Do you agree or disagree with our estimations that in 2018, 20 single-use plastic plates, 75 pieces of single-use plastic cutlery, 3 EPS boxes, 8 EPS cups, 6 EPS pots and 3 EPS trays and cones were consumed per person in England? - EPS beverage containers:

Don't know

Blank free text box for answer:

17 Under our baseline scenario where there is no ban of single-use plastic plates and cutlery, we have forecast a 10% reduction per annum in the market share of the products to reflect a shift away from single-use plastics. Do you agree or disagree with this assumption?

Disagree

Blank free text box for answer:

Alternatives have already been available to the market for a number of years, and therefore, most voluntary adoptions will have already occurred.

18 Under our baseline scenario where there is no ban of EPS items, we have forecast a 5% reduction per annum in EPS market share to reflect a shift away from single-use plastics. Do you agree or disagree with this assumption?

Disagree

Blank free text box for answer:

EPS food containers are much cheaper than other single use options and therefore as above, voluntary changes have mostly already been undertaken, as alternatives have been available for a number of years.

19 Do you agree or disagree with our assumption that in 2018 50% of single-use plates and 90% of single-use cutlery in England were made from plastic?

Do you agree or disagree with our assumption that in 2018 50% of single-use plates and 90% of single-use cutlery in England were made from plastic? - Plates:

Don't know

Do you agree or disagree with our assumption that in 2018 50% of single-use plates and 90% of single-use cutlery in England were made from plastic? - Cutlery:

Don't know

Blank free text box for answer:

20 Do you agree or disagree with our assumption that in 2020, 80% of all food and beverage boxes, cups, pots and trays and cones in England were made from EPS?

Do you agree or disagree with our assumption that in 2020, 80% of all food and beverage boxes, cups, pots and trays and cones in England were made from EPS? - Box:

Don't know

Do you agree or disagree with our assumption that in 2020, 80% of all food and beverage boxes, cups, pots and trays and cones in England were made from EPS? - Cup:

Don't know

Do you agree or disagree with our assumption that in 2020, 80% of all food and beverage boxes, cups, pots and trays and cones in England were made from EPS? - Pot:

Don't know

Do you agree or disagree with our assumption that in 2020, 80% of all food and beverage boxes, cups, pots and trays and cones in England were made from EPS? - Tray:

Don't know

Do you agree or disagree with our assumption that in 2020, 80% of all food and beverage boxes, cups, pots and trays and cones in England were made from EPS? - Cone:

Don't know

Blank free text box for answer:

21 We have assumed that 10% of single-use plastic plates and cutlery are produced in the UK. Do you agree or disagree with this assumption?

We have assumed that 10% of single-use plastic plates and cutlery are produced in the UK - Plastic plates:

Don't know

We have assumed that 10% of single-use plastic plates and cutlery are produced in the UK - Plastic cutlery:

Don't know

Blank free text box for answer:

22 We have assumed that 95% of EPS food and beverage containers are produced in the UK. Do you agree or disagree with this assumption?

We have assumed that 95% of EPS food and beverage containers are produced in the UK. - EPS food containers:

Don't know

We have assumed that 95% of EPS food and beverage containers are produced in the UK. - EPS beverage containers:

Don't know

Blank free text box for answer:

23 If applicable, if a ban on single-use plastic plates and cutlery was to be implemented, how would your business respond?

Not Answered

24 If you manufacture single-use plates and cutlery domestically, how would you expect a ban on these items to affect your activity?

Not Answered

Blank free text box for answer:

25 If applicable, if a ban on EPS food and beverage containers was to be implemented, how would your business respond?

26 If you manufacture EPS food and beverage containers domestically, how would you expect a ban on these items to affect your activity?

Not Answered

Blank free text box for answer:

27 Our estimations of the costs of single-use plastic plates and cutlery compared with alternatives are shown in the below table. Do you agree or disagree with our estimations?

Our estimations of the costs of single-use plastic plates and cutlery compared with alternatives are shown in the below table. - Plate (plastic):

Our estimations of the costs of single-use plastic plates and cutlery compared with alternatives are shown in the below table. - Cutlery (plastic):

Our estimations of the costs of single-use plastic plates and cutlery compared with alternatives are shown in the below table. - Plate (alternative):

Our estimations of the costs of single-use plastic plates and cutlery compared with alternatives are shown in the below table. - Cutlery (alternative):

Blank free text box for answer:

Please see WCL response submitted for this consultation.

28 Our estimations of the costs of EPS compared with paper alternatives are shown in the below table. Do you agree or disagree with our estimations?

Estimations of the costs of EPS compared with paper alternatives - Box (EPS):

Estimations of the costs of EPS compared with paper alternatives - Cup (EPS):

Estimations of the costs of EPS compared with paper alternatives - Pot (EPS):

Estimations of the costs of EPS compared with paper alternatives - Trays (EPS):

Estimations of the costs of EPS compared with paper alternatives - Cones (EPS):

Estimations of the costs of EPS compared with paper alternatives - Box (Paper):

Estimations of the costs of EPS compared with paper alternatives - Cup (Paper):

Estimations of the costs of EPS compared with paper alternatives - Pot (Paper):

Estimations of the costs of EPS compared with paper alternatives - Trays (Paper):

Estimations of the costs of EPS compared with paper alternatives - Cones (Paper):

Blank free text box for answer:

Please see WCL response submitted for this consultation.

29 Do you agree or disagree with our assumption (outlined in the accompanying impact assessments) that the additional costs from alternative materials will remain the same for the appraisal period?

11. Do you agree or disagree with our assumption (outlined in the accompanying impact assessments) that the additional costs from alternative materials will remain the same? - Plastic plates:

Disagree

11. Do you agree or disagree with our assumption (outlined in the accompanying impact assessments) that the additional costs from alternative materials will remain the same? - Plastic cutlery:

Disagree

11. Do you agree or disagree with our assumption (outlined in the accompanying impact assessments) that the additional costs from alternative materials will remain the same? - Plastic balloon sticks:

Disagree

11. Do you agree or disagree with our assumption (outlined in the accompanying impact assessments) that the additional costs from alternative materials will remain the same? - EPS food containers:

Disagree

11. Do you agree or disagree with our assumption (outlined in the accompanying impact assessments) that the additional costs from alternative materials will remain the same? - EPS beverage containers:

Disagree

Blank free text box for answer:

Disagree- market forces likely to drive down cost of alternatives if a ban comes into effect.

30 At end of life, we have assumed the below outcomes for plastic and wooden cutlery. Do you agree or disagree with these assumptions?

Disagree

Blank free text box for answer:

We think it is unlikely 10% of plastic cutlery is recycled due to its low value and high contamination.

For wooden cutlery it is unlikely 20% are industrially composted. There is very limited composting facilities in England, with Anaerobic Digestion being where most organic waste from households is sent.

31 At end of life, we have assumed the below outcomes for plastic and paper plates. Do you agree or disagree with these assumptions?

Disagree

Blank free text box for answer:

Although the recycling rates stated are low- typically these are not recycled.

32 At end of life, we have assumed the below outcomes for EPS and paper alternative products. Do you agree or disagree with these assumptions?

Disagree

Blank free text box for answer:

Although we agree and welcome the recognition on the lacking of recycling of EPS, we disagree that no EPS is found as beach litter. While not recorded as a separate category- we do find it.

33 Do you agree or disagree with our assumption that litter disamenity values remain the same for the appraisal period?

Not Answered

Blank free text box for answer:

34 In determining the number of businesses that will be affected by a ban on EPS food and drink containers and single-use plastic plates and cutlery, we used Standard Industrialisation Codes (SICs) to identify categories of businesses likely to be affected. However, we have assumed that fast-food restaurants are more likely to use EPS food and beverage containers and single-use plastic plates and cutlery than restaurants and therefore estimated the number of fast-food restaurants in England rather than using all the businesses in the "restaurants and mobile food service activities" SIC. Do you agree or disagree with this assumption?

SIC codes - Plastic plates:

SIC codes - Plastic cutlery:

SIC codes - EPS food containers:

SIC codes - EPS beverage containers:

Blank free text box for answer:

35 Do you agree or disagree with our estimation that 144,342 businesses will be affected by familiarisation costs for a ban on EPS containers?

Not Answered

Blank free text box for answer:

36 Do you agree or disagree with our estimation that 90,650 businesses will be affected by familiarisation costs for a ban on single-use plastic plates and cutlery?

Not Answered

Blank free text box for answer:

37 We have assumed that, on average, it would take 30 minutes of a full-time employee's time for businesses to familiarise themselves with the ban. Do you agree or disagree with this assumption?

Not Answered

Blank free text box for answer:

38 In calculating additional fuel costs to businesses from transporting heavier paper items, we have assumed a mean distance travelled of 100km. Do you agree or disagree with this assumption?

Not Answered

Blank free text box for answer:

39 For our central scenario for costs being passed from businesses to consumers, we have assumed that 60% of the costs businesses incur as a result of a greater unit price of alternative items will be passed to consumers. Do you agree or disagree with this assumption?

For our central scenario for costs being passed from businesses to consumers, we have assumed that 60% of the costs businesses incur as a result of a greater unit price of alternative items will be passed to consumers - Plastic plates and cutlery:

For our central scenario for costs being passed from businesses to consumers, we have assumed that 60% of the costs businesses incur as a result of a greater unit price of alternative items will be passed to consumers - EPS containers:

For our central scenario for costs being passed from businesses to consumers, we have assumed that 60% of the costs businesses incur as a result of a greater unit price of alternative items will be passed to consumers - Plastic balloon sticks:

Blank free text box for answer:

40 Do you anticipate any additional costs and/or constraints to a) industry and b) consumers from this proposed ban on single-use plastic plates, plastic cutlery, plastic balloon sticks, EPS food containers, and EPS beverage containers?

Do you anticipate any additional costs and/or constraints - Plastic plates (industry):

Do you anticipate any additional costs and/or constraints - Plastic cutlery (industry):

Do you anticipate any additional costs and/or constraints - Plastic balloon sticks (industry):

Do you anticipate any additional costs and/or constraints - EPS food containers (industry):

Do you anticipate any additional costs and/or constraints - EPS beverage containers (industry):

Do you anticipate any additional costs and/or constraints - Plastic plates (consumers):

Do you anticipate any additional costs and/or constraints - Plastic cutlery (consumers):

Do you anticipate any additional costs and/or constraints - Plastic balloon sticks (consumers):

Do you anticipate any additional costs and/or constraints - EPS food containers (consumers):

Do you anticipate any additional costs and/or constraints - EPS beverage containers (consumers):

Blank free text box for answer:

Additional questions

41 Apart from a ban, are there any other approaches that Government should consider? Please provide any evidence in support of your recommended approach.

Blank free text box for answer:

We would like to see a more circular system approach applied. This consultation did not include any assessment for reusables, despite prevention being the most important aspect of the waste hierarchy. The need for increased efficiency of resources is important both for material reduction and achieving net zero. We would like to see the introduction of reuse targets as a matter of some urgency. Some further direct actions are listed in the WCL submission and are supported by MCS.

The comment from SystemIQ report (https://www.systemiq.earth/wp-content/uploads/2020/07/BreakingThePlasticWave_MainReport.pdf page 9) provides an excellent summary of the situation: "Governments and industry leaders are stepping up with new policies and voluntary initiatives, but these are often narrow in focus or concentrated in low-leakage countries. By 2040, current government and industry commitments are likely to reduce annual plastic leakage to the ocean by only 7 per cent (± 1 per cent) relative to the Business-as-Usual Scenario. A review of the key government initiatives worldwide—such as the European Union's single-use plastics directive and the growing number of national plastic policies—often reveals a narrow focus on select items (e.g., straws, bags, cups, stirrers, cotton swabs, and bottles), which severely limits the reduction in total leaked plastic mass."

The limited narrow focus on select items as outlined in this consultation will not tackle the systematic change that is needed to reduce plastic leaking into our oceans and there is a need to move away from consultations which look at banning item by item.

42 Is there anything else you would like to tell us relating to the proposed ban on the supply of single-use plastic plates, cutlery, balloon sticks and food and beverage containers made out of EPS?

Blank free text box for answer: