

Marine Conservation Society response to the Scottish Government Single use food containers and other single-use items: call for evidence April 2022

Question 1. Do you have any evidence of the environmental impact of single use (plastic or non-plastic) food containers?

We note that the measures proposed in this call for evidence would contribute toward Scottish Ministers following the guiding principles on the environment set out in section 13 of the UK Withdrawal from the European Union (Continuity) (Scotland) Act 2021:

- “(a) the principle that protecting the environment should be integrated into the making of policies,
- (b) the precautionary principle as it relates to the environment,
- (c) the principle that preventative action should be taken to avert environmental damage,
- (d) the principle that environmental damage should as a priority be rectified at source,
- (e) the principle that the polluter should pay.”

The Marine Conservation Society’s Beachwatch litter surveys show that thousands of single use items are recorded on UK beaches each year.

During the 2021 Marine Conservation Society Great British Beach Clean, volunteers in Scotland found, on average, 346 pieces of litter per 100m of surveyed beach, of which 251 were plastic. During the Great British Beach Clean 2021 volunteers in Scotland found on average 1.6 single use plastic food containers per 100m of beach surveyed¹. Around a third of all litter that was recorded can be attributed to the public, including nearly all the items listed in this call for evidence. Period and incontinence products are sourced as sewage related debris which comprise 5.5% of all litter found. It is also likely that the public contribution to litter is in fact higher with 45% of litter recorded as “unsourced” because the source of the litter is unable to be attributed. Typically, these are plastic pieces which are too degraded to determine the product type¹.

Furthermore, the “disamenity” effect of litter has shown that it impacts on tourism and can potentially weaken coastal economies. Beach users regularly highlight cleanliness as being a critical component affecting their choice of where to visit^{2/3}.

Beach and ocean clean ups are very costly and ineffective at reducing the amount entering and negatively impacting the ocean. It is therefore important to focus on prevention to stop

this litter at source, which often has the added benefit of contributing towards net zero carbon.

Under the EU Marine Strategy Framework Directive (MSFD), beach litter monitoring is required by member states in order to measure progress toward Descriptor 10 "Properties and quantities of marine litter do not cause harm to the coastal and marine environment". This in turn led to the recognition of the need for further action and therefore the development of the Single-use Plastics Directive. In November 2020 under the EU MSFD, a threshold value of 20 items per 100m⁴ was set and member states are expected to put into place measures to facilitate reaching this value⁵. This threshold value is considered "by experts from the MSFD Technical Group on Marine Litter to reduce harm from beach litter to a sufficiently precautionary level" and contributes to the fulfilment of the United Nations' Sustainable Development Goal 14.1: to significantly reduce marine pollution by 2025. The same methodology has been adopted by OSPAR (which the UK is a contracting party with representatives from Scottish Government) to calculate litter levels as part of commitments to reduce litter within the OSPAR region. Using the EU/OSPAR methodology the Marine Conservation Society estimate there were 1016 litter items per 100m in Scotland, calculated (over a three-year period of 2019-2021). **In other words, on Scottish beaches, the litter levels are fifty times higher than the threshold value**⁶.

Therefore, we need to address one of the root causes of our high litter levels by moving away from our current single-use society since we cannot recycle our way out of the current plastics crisis. Nor should we simply replace plastic with another single-use material which would fail to create a low carbon, low resource future. Of all the plastic used globally only 2% is recycled back into like for like product, with 8% cascaded recycling (also known as downcycling where plastics go back into lower value plastic products)⁷. Of the plastic recycled globally only 10% of it has been recycled more than once due to "contamination and the mixing of polymer types generate secondary plastics of limited or low technical and economic value⁸" with mechanical recycling degrading the quality of the material⁹. Reuse must be at the heart of our solution and product design must take into account their carbon, plastic and chemical footprint - particularly 'forever chemicals'. Legislation to specifically tackle single-use plastic is an important step in reducing the amount of plastic found on our beaches.

The proposed policy measures, from market restrictions to charges, listed in this call for evidence are therefore in alignment with Scotland's circular economy ambitions. It is also important to note that since 90% of marine litter in Scotland comes from Scotland¹⁰, we need to be introducing preventative solutions here in Scotland.

References

1. Marine Conservation Society Great British Beach Clean data 2021. Data collected from 129 stretches of beach in Scotland between the 17th and 26th of September 2021.

2. http://www.keepbritaintidy.org/ImgLibrary/beach_segmentation_2005_637.pdf
3. <https://www.researchgate.net/publication/279579359> How much is a clean beach worth The impact of litter on beach users in the Cape Peninsula South Africa
4. <https://publications.jrc.ec.europa.eu/repository/handle/JRC121707>
5. <https://ec.europa.eu/jrc/en/news/eu-member-states-agree-threshold-value-keep-europe-s-beaches-clean>
6. Marine Conservation Society data collected from three OSPAR monitored beaches in Scotland between 2019-2021.
7. <https://ellenmacarthurfoundation.org/the-new-plastics-economy-rethinking-the-future-of-plastics>
8. <https://advances.sciencemag.org/content/3/7/e1700782>
9. <https://onlinelibrary.wiley.com/doi/10.1002/marc.202000415>
10. <https://www.gov.scot/binaries/content/documents/govscot/publications/factsheet/2019/11/marine-scotland-topic-sheets-ecosystems/documents/plastic-in-scotlands-seas-published-january-2020/plastic-in-scotlands-seas-published-january-2020/govscot%3Adocument/Topic%2Bsheet%2B151%2Bv1%2B-%2BHow%2Bmuch%2Bplastic%2Benters%2BScottish%2Bseas%2Band%2Bwhere%2Bdoes%2Bit%2Bcome%2Bfrom.pdf>

Question 2. Do you have any evidence of the size and nature of the single-use (plastic and non-plastic) food containers market in Scotland?

The evidence could include how many single-use food containers are used in Scotland, how many are manufactured in Scotland and what types of single-use food containers are used in Scotland.

The UK takeaway and fast food industry market size is expected to increase 9% in 2022¹. It is therefore expected that the number of containers used would increase proportionally across the UK including within Scotland. Many of these containers are not focused on either recyclability and only very limited outlets provide a reusable option^{2/3}.

References

1. <https://www.ibisworld.com/united-kingdom/market-size/takeaway-fast-food-restaurants/#:~:text=UK%20in%202022%3F-,The%20market%20size%20of%20the%20Takeaway%20%26%20Fast%2DFood%20Restaurants%20industry,to%20increase%209%25%20in%202022.&text=past%205%20years%3F->

[,The%20market%20size%20of%20the%20Takeaway%20%26%20Fast%2DFood%20Restaurants%20industry,average%20between%202017%20and%202022.](#)

2. <https://www.tiffintime.co.uk/>

3. <https://www.edie.net/news/5/Just-Eat-trials-reusable-takeaway-packaging-in-bid-to-cut-plastics-use/>

Question 3. Do you have any evidence of effective actions taken in Scotland or other nations to reduce consumption of single-use (plastic or non-plastic) food containers?

There have been several trials and projects encouraging the use of reusable take away containers to decrease the amount of single use food containers having to be used in Scotland as well as other measures such as deposits and charges.

Projects the Marine Conservation Society is aware of includes:

The Zero Waste Scotland 'Ditching Disposables' campaign¹

The Grab Trust Waste Free Take Away project²

Ecoeats³

References

1. <https://www.zerowastescotland.org.uk/press-release/global-first-part-%C2%A31m-plan-ditch-disposables-scottish-communities>

2. <http://www.grab.org.uk/projects.html>

3. <https://ecoeats.uk/>

Question 4. Do you have any evidence of barriers to implementing policy measures to reduce the consumption of single-use food containers?

No

Question 5. Do you have any evidence related to the impact on businesses (positive or negative) that policy measures to reduce the consumption of single-use food containers could have?

No

Question 6. Do you have any evidence of the impact that policy measures to reduce the consumption of single-use food containers might have on people with protected characteristics or who experience socio-economic disadvantage?

The protected characteristics laid down by the Equality Act 2020 are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation. Your answer might also include evidence of where single-use food containers are considered essential.

We appreciate that a blanket ban is a blunt tool and that certain individuals will have particular needs. Where there are groups and individuals with specific needs, we defer to their responses to ensure policies are as inclusive as possible. Exemptions for people with specific needs or particular sectors are important, and have to be integrated fairly with the wider system change that is crucial to achieve a circular economy, and aligning with the guiding principles on the environment set out in s.13 of the UK withdrawal from the European Union (Continuity) (Scotland) Act 2021. Products likely to be problematic and potentially cause harm to people and the planet should not be designed and put on the market. The Scottish Government should strive to deal with system wide issues so that the resource use principles of circularity - reuse, repair, and remanufacture - are embedded in policy.

Question 7 - Do you have any evidence of the environmental impact of the single-use items set out in Part 2 of the call for evidence paper?

- a. Single-use plastic bowls, trays and platters;**
- b. Single-use plastic period and incontinence products;**
- c. Single-use plastic sachets;**
- d. Single-use plastic tobacco filters; and**
- e. Single-use plastic packaging on fruit and vegetables.**

Single-use plastic bowls, trays and platters

During the Great British Beach Clean 2021 volunteers in Scotland found on average 3.7 single use plastic items under the cutlery/trays/ straws category per 100m of beach surveyed¹.

References

1. Marine Conservation Society Great British Beach Clean data 2021. Data collected from 129 stretches of beach in Scotland between the 17th and 26th of September 2021.

Single-use plastic period and incontinence products

Sewage related debris comprises sanitary items such as wet wipes, pads and tampons that are flushed down the toilet instead of being bagged and binned, which then enter the marine environment via the sewage network. We believe that stopping pollution at source is the most effective way to reduce the amount of sewage related debris entering the marine environment and can be achieved via the following measures:

- Supporting consumers to move to reusable products and towards a circular economy.
- Banning all avoidable single-use plastic in wet wipes and other sanitary items, such as tampon applicators, where alternatives exist.
- Applying Extended Producer Responsibility (EPR) to all sanitary products (not just those that contain plastic) and clean-up costs.
- Products which have been identified as items which get mis flushed by consumers should be legally required to label the product 'Do not Flush'. Wet wipes should only be labelled as flushable if they pass the water industry standard 'Fine to Flush.' However, this standard should only be permitted for wet wipes for removal of faecal or other bodily fluids e.g. should not include make-up wipes or other non-wipe products. We do however urge Scottish government alongside Scottish water to review flushable wipes and their impact. We urge a study to understand what the implications if flushable wipes were to be removed from sale would have on the sewer system while understanding the needs of those who currently use them to improve quality of life. This is particularly important in light of Yorkshire water who in January 2022 released a statement calling for "an end to 'Fine to Flush' labelling¹.
- Improved labelling and consumer awareness to promote correct disposal (e.g. a requirement for products to display 'Plastic in Product'.

Sanitary items often contain plastics, which persist for long periods in the marine environment, breaking down over time into smaller and smaller pieces eventually becoming secondary micro plastics (<5mm). The ingestion of plastic pollution by marine life can negatively impact feeding behaviour, growth, development, reproduction and lifespan² and may result in greater exposure to persistent organic pollutants³. Prevention must therefore be prioritised to stop plastic entering the environment and reduce the impact it is having on the ocean.

Sanitary items often contain plastics. Sanitary towels are usually made from polypropylene PP, polyethylene (PE) or a combination⁴. PP is one of two of the main plastics found in our oceans⁵. A recent study looking at the presence of fibres in sediments adjacent to a wastewater treatment plant consistently found white microplastic fibres that were comparable with the white fibres from wet wipes and sanitary towels, demonstrating that sanitary waste is a source of microfibre pollution in the marine environment⁴.

The negative impacts of plastic litter (including microplastics) on marine wildlife are well documented. If ingested by marine life they can damage the digestive system, prevent digestion or stop animals from feeding, resulting in impacts on their growth, development, reproduction and lifespan² and can result in severe suffering and starvation⁶. Marine life that ingests microplastics may be exposed to higher levels of persistent organic pollutants which adsorb to the surface of microplastics³. Once sanitary items have been flushed into sewers they can combine with fats and oils, reducing capacity in the sewer. This can increase the frequency that sewers overflow and cause blockages resulting in environmental pollution and flooding of homes and gardens. There are over 300,000 sewer blockages throughout the UK every year, costing £100 million to clear up.

Furthermore, sanitary waste on beaches impacts on tourism and can potentially weaken coastal economies⁷.

During the Great British Beach Clean 2021 32% of beach litter surveys in Scotland found towels/liners/backing strips and 26% of beach litter surveys found tampons/applicators. Volunteers in Scotland found on average 1 single use plastic item under the category of tampons/applicators per 100m of beach surveyed and on average 2.2 per 100m of beach surveyed under the category towels/panty liners/backing strips⁸.

References

1. <https://www.yorkshirewater.com/news-media/news-articles/2022/yorkshire-water-backs-ban-on-plastics-in-wet-wipes/>
2. <https://www.sciencedirect.com/science/article/pii/S0269749118333190>
3. <https://royalsocietypublishing.org/doi/abs/10.1098/rstb.2008.0284>
4. <https://doi.org/10.1016/j.watres.2020.116021>
5. <https://www.sciencedirect.com/science/article/pii/S0025326X19300748#ab0005>
6. https://www.researchgate.net/publication/315386479_Harm_caused_by_Marine_Litter/link/58cfb103a6fdccff68e2dc8a/download
7. https://www.keepbritaintidy.org/ImgLibrary/beach_segmentation_2005_637.pdf
8. Marine Conservation Society Great British Beach Clean data 2021. Data collected from 129 stretches of beach in Scotland between the 17th and 26th of September 2021.

Single-use plastic sachets

Single use sachets and other applications comprised of multiple layers of multiple materials should be banned. Alan Jope, CEO of Unilever when asked during the launch of the “Break the wave plastic report”¹ in July 2020 about multilayer single use plastic sachets stated “we have to get rid of them” saying they have “no real value” for mechanical recycling and that chemical recycling is not economical². This material is therefore not fit for the circular economy of the future. Introducing a ban would show strong international leadership in tackling this kind of waste.

During the Great British Beach Clean 2021 volunteers in Scotland found on average 19.39 single use plastic items under the category of packets: Crisp/sweet/lolly (including sticks)/sandwich per 100m of beach surveyed³.

References

1. https://www.systemiq.earth/wp-content/uploads/2020/07/BreakingThePlasticWave_MainReport.pdf
2. <https://www.youtube.com/watch?reload=9&v=tNtkgRkenIk&feature=youtu.be> 1hr21-22 mins into panel
3. Marine Conservation Society Great British Beach Clean data 2021. Data collected from 129 stretches of beach in Scotland between the 17th and 26th of September 2021.

Single-use plastic tobacco filters

Cigarette stubs are found to take around 14 years¹ to degrade, during this time, thousands of chemicals are released² into the environment as well as micro plastics³. Many of the cigarette butts dropped in the streets end up in our ocean and waterways after being washed down drains. The chemicals contained in these cigarette butts pollute our waterways, endangering any animals that ingest them – one cigarette butt left to soak in water for 96 hours will release enough toxins to kill half of the salt or fresh water fish that are exposed to it⁴.

In addition, Green et al 2021⁵ showed that even in a flow through system (with constant replacement of seawater) cellulose acetate filters reduced the feeding rates of keystone bivalves (blue mussels) and decreased the biomass of microscopic primary producers in the sediment. Blue mussels are farmed across the UK.

This study on impact is particularly important because most studies have used static water bodies to simulate the marine environment, which do not reflect the dynamic conditions of

the ocean (with constant movement and replacement of water). Notably biodegradable cellulose cigarette butts had minimal effects.

Marine Conservation Society has been working with ASH Scotland and ASH Wales both of whom have stated that they have long been aware that cigarette filters do not benefit health, although two thirds of smokers think that they do⁶. ASH Scotland and ASH Wales instead state that cigarette filters act to make smoke smoother and more palatable and that by giving the impression of reduced harm, and by making the experience of smoking less harsh, plastic filters make it easier for young people to take up smoking. ASH Scotland stated that they are concerned that the overall health impact of filters is likely to be negative⁷.

According to a study carried out by Keep Britain Tidy in 2018, one in ten smokers do not consider cigarette butts to be a form of litter and 10% think they are biodegradable. Meanwhile less than half of smokers know that cigarettes contain plastic⁸.

During the September 2021 Marine Conservation Society beach clean an average of 9.4 cigarette butts were found per 100m of beach surveyed in Scotland⁹. There has also been anecdotal evidence from volunteers reporting e-cigarette waste turning up on beaches. The Marine Conservation Society supports ASH Scotland's response in calling for the Scottish Government to review the evidence of the environmental impact of e-cigarette waste and to take necessary action.

References

1. Joly & Coulis 2018
<https://www.sciencedirect.com/science/article/pii/S0956053X17308474> "conventional plastic filters take 7.5–14 years to disappear, in the compost and on the soil surface, respectively....cellulose filters take 2.3–13 years to disappear, in the compost and on the soil surface, respectively"
2. <https://www.sciencedirect.com/science/article/abs/pii/S0269749119364693?via%3Dihub>
3. Novotny, T.E., Slaughter, E. 2014 <https://link.springer.com/article/10.1007/s40572-014-0016-x>
4. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC30884>
5. <https://www.sciencedirect.com/science/article/abs/pii/S0025326X21001867?via%3Dihub>
6. <https://bmcpublichealth.biomedcentral.com/articles/10.1186/s12889-015-2643>
7. https://media.mcsuk.org/documents/2021_Cigarette_Filters.pdf
8. <https://www.keepbritaintidy.org/news/its-flicking-blue-murder>

9. Marine Conservation Society Great British Beach Clean data 2021. Data collected from 129 stretches of beach in Scotland between the 17th and 26th of September 2021.

Single-use plastic packaging on fruit and vegetables

During the Great British Beach Clean 2021 volunteers in Scotland found on average 1.2 single use plastic items under the category of small plastic bags per 100m of beach surveyed and on average 0.2 single use plastic items under the category of mesh bags per 100m of beach surveyed in Scotland¹.

References

1. Marine Conservation Society Great British Beach Clean data 2021. Data collected from 129 stretches of beach in Scotland between the 17th and 26th of September 2021.

Question 8 - Do you have any evidence of the size and nature of the market for the single-use items set out in Part 2 of the call for evidence paper?

- a. Single-use plastic bowls, trays and platters;**
- b. Single-use plastic period and incontinence products;**
- c. Single-use plastic sachets;**
- d. Single-use plastic tobacco filters; and**
- e. Single-use plastic packaging on fruit and vegetables.**

No

Question 9 - Do you have any evidence on what alternatives to single-use items set out in Part 2 of the call for evidence paper are available and any negative impacts (environmental or other) that increased use of these alternatives could have?

- a. Single-use plastic bowls, trays and platters;**
- b. Single-use plastic period and incontinence products;**
- c. Single-use plastic sachets;**
- d. Single-use plastic tobacco filters; and**
- e. Single-use plastic packaging on fruit and vegetables.**

Single-use plastic bowls, trays and platters;

We cannot recycle our way out of our current plastics crisis and we should not simply replace a single-use plastic item with one made from a “biodegradable” alternative as this perpetuates our linear make-use-throw society. Alternatives to plastic and polystyrene food packaging often include paper, card or moulded fibre products. In order to maintain a suitably water or greaseproof material, the packaging is often treated with a chemical from the PFAS group (per and poly fluorinated alkyl substances)¹. PFAS are a group of several thousand chemically similar compounds, often nicknamed “ forever chemicals” because of their extreme persistence in the environment. These paper and board alternatives to plastic are often marketed as compostable or recyclable. However, composting represents a direct source of PFAS to the environment, and once there, they can persist for thousands of years, longer than much of the plastic they replace. Those PFAS that have been analysed are known to be bioaccumulative and harmful to both wildlife and human health, linked to a wide range of problems including impaired immune, liver, kidney and blood functions in marine mammals².

References

1. <https://www.pfasfree.org.uk/wp-content/uploads/Forever-Chemicals-in-the-Food-%20Aisle-Fidra-2020-.pdf>
2. Fair, P. A., et al. (2013) Associations between perfluoroalkyl compounds and immune and clinical chemistry parameters in highly exposed bottlenose dolphins, *Environmental Toxicology and Chemistry*, 32

Single-use plastic period and incontinence products;

With 132 tampons and applicators and 284 towels/panty liners/backing strips recorded on beaches in Scotland during the September 2021 Great British Beach Clean we are keen to look at options to reduce these items turning up on Scotland’s beaches and polluting our seas.

Policy levers such as market restrictions could be used, similar to the ban on single use plastic cotton bud stems, however we are concerned at the apparent lack of research and regulation on period products in relation to them containing plastic or not. At present there are many plastic-free products (including plastic free tampons) already available on the market although they tend to be more expensive. However, we have been told by some manufacturers that they cannot remove plastic coatings on their tampons due to the

increased risk to women's health if they were to do so. We also know from polling we have commissioned that people would like more information on how to ensure they have the same levels of hygiene from reusable products. Therefore, there appears to be a lack of accessible information and research on what would be best for both the health of people who use these products and for the environment.

We can find no published guidance to support people using reusables (e.g. washing conditions), nor any independently published evidence document published by health professionals outlining the most up-to-date information on impacts of single-use (both plastic and non-plastic) and reusable products on people's health.

We therefore call on the Scottish government through this Call For Evidence to publish this guidance and research on period products as a matter of urgency so that we can ensure a fair and just transition to a more circular economy.

During this consultation the Marine Conservation Society wrote to the Minister for Public Health, Women's Health and Sport Health Maree Todd MSP to ask for any information on the matter above. We thank the Scottish Government for their swift response and the highlighting of the creation of an ISO Technical Committee specifically looking at international standards for menstrual products.¹ We therefore welcome the creation of a mirror committee by the British Standards Institute and the Scottish Government's commitment to contribute to that committee, as highlighted in the letter. We strongly encourage the Scottish Government to provide evidence and support to ensure that the BSI reflects the best outcome for users of menstrual products and the environment.

Single-use plastic sachets;

Single-use plastic tobacco filters; and

Single-use plastic packaging on fruit and vegetables.

Question 10 - Do you have any evidence of effective action taken to reduce the consumption of the single-use items set out in Part 2 of the call for evidence paper?

- a. Single-use plastic bowls, trays and platters;**
- b. Single-use plastic period and incontinence products;**
- c. Single-use plastic sachets;**
- d. Single-use plastic tobacco filters; and**
- e. Single-use plastic packaging on fruit and vegetables.**

Single-use plastic bowls, trays and platters;

Single-use plastic period and incontinence products;

Plastic Free products are already available on the market so we are calling for period products being offered through the period product funding to be 100% plastic free by the end of 2026 at the latest in line with Welsh Government commitments¹.

However, within that time an evidence document must be published by health professionals to look at the health implications of single use plastic products and reusable products. We note that overall, there is a significant lack of information and accessible research on all period products which needs to be addressed.

For example, the vast majority of tampons have a plastic coating but there are some that do not have this coating, it is not currently clear whether or not there are health implications with the inclusion or exclusion of the coating. Furthermore, there needs to be guidance published on the barriers to reusable products and actions where possible instigated e.g., guidance on washing of reusables. For some people, reusable products may not be feasible or practical, but data needs to be collected to understand these and thereby set a meaningful target for reuse which ensures accessibility needs are taken into consideration.

We would therefore ask that the Scottish Government do or commission research to understand what barriers to reusables might exist to help overcome them to ensure a fair transition to a circular economy.

Projects that the Marine Conservation Society is aware of includes:

- GRAB Trust Be Part of the Cycle Project²
- ZWS Trial Period³

References

1. Period Product funding – Wales: We will increase the number of plastic free products funded through the period dignity grant. Our aim is 90 -100% plastic free by 2026.

<https://gov.wales/sites/default/files/consultations/2021-10/period-dignity-strategic-action-plan-young-peoples-version.pdf>

2. <http://www.grab.org.uk/projects.html>

3. <https://www.trialperiod.scot/>

Single-use plastic sachets;

We would advocate for shift toward bulk dispensers. We understand that hotels and the fast-food sector are already moving in this welcome direction.

Single-use plastic tobacco filters; and

We recommend that regulatory action should include a ban on plastic cigarette filters, imposing Extended Producer Responsibility duties on tobacco manufacturers and raising awareness of filters being a plastic product.

EPR has the benefit of transferring costs to the producer, however it is unlikely to result in reduced littering. It has been shown that EPR is neither effective at reducing the amount of marine litter found¹ nor at mitigating against the health crisis. Therefore, EPR must be accompanied by a ban on plastic filters, a review of other single use filters and an ongoing national campaign aimed at raising awareness of the impact of cigarette litter on the environment.

We would reiterate what we answered in question 7 that there has also been anecdotal evidence from volunteers reporting e-cigarette waste turning up on beaches. The Marine Conservation Society supports ASH Scotland's response in calling for the Scottish Government to review the evidence of the environmental impact of e-cigarette waste and to take necessary action.

References

1. <https://www.sciencedirect.com/science/article/pii/S0308597X20309660>

Single-use plastic packaging on fruit and vegetables.

Question 11 - Do you have any evidence related to barriers to implementing policy measures to reduce the consumption of the single-use items set out in Part 2 of the call for evidence paper?

- a. Single-use plastic bowls, trays and platters;**
- b. Single-use plastic period and incontinence products;**
- c. Single-use plastic sachets;**
- d. Single-use plastic tobacco filters; and**
- e. Single-use plastic packaging on fruit and vegetables.**

No

Question 12 - Do you have any evidence related to the impact on businesses (positive or negative) of policy measures to reduce the consumption of the single-use items set out in Part 2 of the call for evidence paper?

- a. Single-use plastic bowls, trays and platters;**
- b. Single-use plastic period and incontinence products;**
- c. Single-use plastic sachets;**
- d. Single-use plastic tobacco filters; and**
- e. Single-use plastic packaging on fruit and vegetables.**

No

Question 13 - Do you have any evidence of the impact that policy measures to reduce the consumption of the single-use items set out in Part 2 might have on people with protected characteristics or who experience socio-economic disadvantage of the call for evidence paper?

The protected characteristics laid down by the Equality Act 2020 are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

- a. Single-use plastic bowls, trays and platters;**
- b. Single-use plastic period and incontinence products;**
- c. Single-use plastic sachets;**
- d. Single-use plastic tobacco filters; and**
- e. Single-use plastic packaging on fruit and vegetables.**

We refer to our answer to Question 6: We appreciate that a blanket ban is a blunt tool and that certain individuals will have particular needs. Where there are groups and individuals with specific needs, we defer to their responses to ensure policies are as inclusive as possible. Exemptions for people with specific needs or particular sectors are important, and have to be integrated fairly with the wider system change that is crucial to achieve a circular economy, and aligning with the guiding principles on the environment set out in s.13 of the UK withdrawal from the European Union (Continuity) (Scotland) Act 2021. Products likely to be problematic and potentially cause harm to people and the planet should not be designed and put on the market. The Scottish Government should strive to deal with system wide issues so that the resource use principles of circularity - reuse, repair, and remanufacture - are embedded in policy.