

Response ID ANON-WGGP-UEC5-7

Submitted to Call for evidence on commonly littered and problematic plastic items
Submitted on 2022-02-10 14:39:46

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 one which is most applicable to you):

non-governmental organisation

Blank free text box for answer:

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

Organisation:
Marine Conservation Society

Wet wipes

6 Would you support a ban on wet wipes containing plastic? You will be asked about possible exemptions in the following questions.

Yes

Blank free text box for answer:

The impacts of wet wipes on the sewerage system and natural environment are well known and this has resulted in some retailers already removing plastic from their wet wipes. A survey of 12 retailers who sell own brand wet wipes, conducted by the Marine Conservation Society in November 2020, found that three retailers had already removed plastic from all own brand wet wipes (flushable and non-flushable) and five committed to doing so by the end of December 2021. An update to the survey in January 2022 found that five retailers have now removed plastic from all of their own brand wet wipes and a further five retailers plan to do this by the end of 2022. A ban on wet wipes containing plastics is therefore feasible, practical and financially viable.

Furthermore, there is strong public support, with a Nationally representative survey of GB adults, conducted by YouGov for the Marine Conservation Society in 2021, showing that 82% of people in England support a ban on wet wipes containing plastic, with only 4% opposed to a ban.

The recent 10 Minute Rule Bill to ban plastic in wet wipes (Plastics (wet wipes) Bill) received strong cross-party support from MPs, and the public, and was scheduled to have a second reading on 4th February 2022.

However, simply substituting plastic with another single-use material will not be enough by itself to reduce the harm caused by single-use wet wipes, and a number of other measures must be implemented alongside a ban on wet wipes containing plastic, including:

Supporting consumers to move to reusable products to support a circular economy. We need to move away from our current single-use society. We should not simply replace plastic with another single use material, but shift to reusable products, especially for sanitary products which are generally not recycled.

Beyond a ban on plastic in wet wipes, Extended Producer Responsibility (EPR) including clean up costs, should be applied to all other single-use wet wipes, and other single-use sanitary products.

Making the water industry's 'Fine to Flush' specification a legal requirement for flushable wet wipes.

Improved labelling and consumer awareness to promote correct disposal for wet wipes i.e. a requirement for products to display 'Plastic in Product' and indicate its impact on the environment (e.g. dead turtle logo), until a ban comes into force for plastic in wet wipes. There should also be a requirement to

display 'Do not flush' for all wet wipes.' The labelling must be clear with minimum size and contrast fonts and colours, on the front and at point of extraction. These design specifications should be mandatory with independent consumer research to ensure the specifications are effective and appropriate.

In addition, any measures which are put in place for wet wipes should be applied to all sanitary items due to the similarity in issues with disposal and associated solutions.

These actions would align with the 'Resources and waste strategy for England' which commits to 'eliminating avoidable plastic waste over the lifetime of the 25 Year Plan', with avoidable defined, as '...when the plastic could have been reused or recycled; when a reusable or recyclable alternative could have been used instead; or when it could have been composted or biodegraded in the open environment'(1).

Impacts of wet wipes containing plastics

During the Marine Conservation Society's Great British Beach Clean 2021, there was an average of 19.9 sewage related debris items found per 100m of beaches surveyed in England, making up 5.1 % of the total litter items found. Sewage related debris result from sanitary items such as wet wipes, pads and tampons being flushed, which then enter the marine environment, when combined sewers overflow, due to heavy rainfall or insufficient capacity in the network, or due to misconnections in the surface water network. In England, the number of wet wipes has increased from 1.9 per 100m in 2005 (when they were first recorded as their own category) to 7.9 per 100m in 2021.

In 2019 prior to the Covid-19 pandemic there were 11.3 wet wipes per 100m, of beaches surveyed in England, showing that this is not a problem particular to the pandemic, but a chronic, long-term issue that needs to be tackled now.

Wet wipes are usually manufactured from polyethylene terephthalate (PET), polypropylene (PP), cellulose or a combination of PET and cellulose (2). PE and PP are two of the main plastics found in our oceans (3) 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 environment (2). 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 lifespan(4) and can result in severe suffering and starvation(5). Marine life which ingest microplastics may be exposed to higher levels of persistent organic pollutants which adsorb to the surface of microplastics (6). Once sanitary items, particularly wet wipes, 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. A study by Water UK in 2017 found that non-flushable wet wipes make up around 93% of the material causing sewer blockages (7). Furthermore, sanitary waste on beaches impacts on tourism and can potentially weaken coastal economies.8

(1) <https://www.gov.uk/government/publications/resources-and-waste-strategy-for-england>

(2) <https://doi.org/10.1016/j.watres.2020.116021>

(3) <https://www.sciencedirect.com/science/article/pii/S0025326X19300748#ab0005>

(4) <https://www.sciencedirect.com/science/article/pii/S0269749118333190~>

(5) https://www.researchgate.net/publication/315386479_Harm_caused_by_Marine_Litter/link/58cfb103a6fdccff68e2dc8a/download

(6) <https://royalsocietypublishing.org/doi/abs/10.1098/rstb.2008.0284>

(7) <https://www.water.org.uk/>

(8) https://www.keepbritaintidy.org/ImgLibrary/beach_segmentation_2005_637.pdf

7 In the case of a ban on wet wipes containing plastic, would you support there being some exemptions for wipes used for medical purposes? Medical uses of wet wipes include patient care, spill absorption, and to clean equipment and surfaces. You will be asked about additional exemptions in the next question.

Don't know

Blank free text box for answer:

We would only support an exemption for wipes used for medical purposes if alternative products were not suitable. The list of successfully certified Fine to Flush products on the WRC website(1) includes a medical wipe which suggests that alternatives may be suitable for some medical situations, however we would recommend further investigation to ensure that this is the case for all medical purposes.

(1) Successful Fine to Flush - Water Research Centre Limited <https://www.wrcplc.co.uk/successful-fine-to-flush>

8 As well as wipes used for medical purposes, are you aware of any uses or situations in which the use of wet wipes containing plastic is essential and could be considered for any exemptions in future legislation? Please give reasons and provide supporting evidence.

Blank free text box for answer:

We are not aware of any further uses which would require an exemption.

No

9 Are you aware of the water industry's Fine to Flush standard?

Yes

10 If you answered yes to question 9, do you think the current water industry 'Fine-to-Flush' standard is effective in reducing sewer blockages caused by wet wipes?

No

Blank free text box for answer:

A survey conducted by the Marine Conservation Society in November 2020, found that only one, out of the ten, main UK retailers had ensured that all of their own brand flushable wet wipes meet the 'Fine to Flush' specification, and of the other nine retailers, only four would commit to doing so by June 2021. An update to the survey in January 2022 found that five retailers have now accredited all of their own brand flushable wet wipes as 'Fine to Flush' (or they have discontinued their flushable product line). A further two retailers are planning to have accredited all of their own brand flushable wet wipes as 'Fine to Flush' (or discontinue their flushable product line) by the end of 2022. However, three retailers could not commit to doing this by the end of this year (2022), with one retailer confirming that they are not planning to move towards the Fine to Flush specification.

Due to the slow voluntary uptake of the 'Fine to Flush' specification many wipes on the market labelled as 'flushable', 'biodegradable' or similar wording are still being sold and are likely to be contributing to blockages. To be effective we believe that legislation is needed to make 'Fine to Flush' a mandatory requirement for any wet wipes labelled or marketed as 'flushable', or any similar labelling that indicates that they can be disposed of in the toilet. However, 'Fine to Flush' should only be applied to wipes within the scope of the specification which limits its use to products '...that when used, the product is likely to become contaminated with faecal or other body waste that could contain water-borne diseases'(1). Even with the Fine to Flush standard, there is still the potential for materials to break apart and pass the standard but not effectively biodegrade. The standard assesses the physical properties of the wipe but does not assess the chemical additives used in the wipe which may will end up the environment via overflows or sewage sludge.

The water industry should ensure that 'Fine to Flush' is effective at stopping blockages and that their treatment can ensure that there is no impact on the environment from these products as they are licensing them to be flushed. There hasn't been any research/assessment as far as we know on effectiveness of Fine to Flush within the sewerage network and its wider potential impact on the environment including chemical pollution. We are aware that at least one water company, Yorkshire Water, has now raised concerns about the effectiveness of the Fine to Flush specification(2) despite having previously supported Fine to Flush (3).

(1) <https://www.water.org.uk/wp-content/uploads/2019/11/Fine-to-Flush-Issue-1.2-November-2019.pdf>

(2) <https://www.yorkshirewater.com/news-media/news-articles/2022/yorkshire-water-backs-ban-on-plastics-in-wet-wipes/>

(3) <https://www.yorkshirewater.com/news-media/news-articles/2020/yorkshire-water-applauds-andrex-fine-to-flush-certification/>

11 Do you support a mandatory 'flushability' standard for wet wipe products placed on the market to indicate more clearly which wipe products are truly flushable?

Yes

Blank free text box for answer:

We believe that this question is poorly phrased and Yes/No responses should be disregarded. The question could be interpreted as asking if all wet wipes on the market should be Fine to Flush, or whether IF a product says it is flushable, then it must pass the Fine to Flush.

The development of the Fine to Flush standard by the UK industry, while helping to address the issue of flushable wipes, which may be necessary for reasons of accessibility and quality of life, does not align with the circular economy. If all wipes were to made to the Fine to Flush standard (currently flushable wipes make up the minority of the wet wipe market) this would increase the amount of material going through our sewer system. While the standard was designed for passing through the system, we are not aware of any studies which show the effectiveness of the standard if there was a wholesale switch to the Fine to Flush.

As responded in question 5 'Fine to Flush' should be a mandatory requirement for any wet wipes labelled or marketed as 'flushable', or any similar labelling that indicates that they can be disposed of in the toilet.

83% of people in England, questioned in a nationally representative YouGov poll of GB adults for MCS in 2017, support the removal of the claim of 'flushable' from all wet wipes if they do not meet water industry standards for what can be safely flushed down the toilet without causing blockages.

12 Do you support mandatory labelling on packaging about disposal and the impact of wet wipe products on the environment?

Yes

Blank free text box for answer:

As responded to question 1, there is a need for clarity for consumers. Wet wipes should only be labelled as flushable (or equivalent wording) if they pass the Fine to Flush standard. There needs to be increased consumer awareness to promote correct disposal for wet wipes. All wipes should be labelled 'Do not flush' unless it passes the Fine to Flush standard. For wipes containing plastic, these products should be labelled with 'Plastic in Product' and indicate its impact on the environment (eg dead turtle logo), until a ban comes into force for plastic in wet wipes.

The labelling must be clear with minimum size and contrast fonts and colours, on the front and at point of extraction. These design specifications should be mandatory with independent consumer research to ensure the specifications are effective and appropriate.

We believe that responsible disposal of sanitary products, including wet wipes, would significantly reduce the amount of sewage related debris entering the marine environment by stopping it at source. Inconsistent and poor labelling of products has led to confusion amongst consumers regarding which products can be safely flushed. For instance, research commissioned by United Utilities found that "one in five women (20%) said they had never been told how to dispose of sanitary items such as tampons and sanitary towels" and for baby or child wet wipes it was "almost a third (32%) of respondents"(1).

Furthermore, there are issues around the use of the term 'biodegradable' and other so called "green" claims, which adds further confusion to consumers, for further information see the Wildlife and Countryside LINK response to the Competition and Markets Authority consultation on Misleading Environmental Claims.

Furthermore, mandatory labelling on packaging about disposal and the impact on the environment should be applied to all sanitary items, not just wet wipes due to the similar issues regarding disposal and impacts on the sewerage system and environment. Although all 12 major high street retailers surveyed by the Marine Conservation Society in November 2020, who sell own brand non flushable wipes confirmed that these wipes clearly state, 'Do not flush' on the front of the packet, only three out of 12 confirmed that they currently do this on all of their own brand sanitary products. An update to the survey in January 2022 found that six retailers had now completed this labelling for all of their own brand sanitary products (excluding wet wipes) and a further four plan to have completed this action by the end of 2022. This highlights the inconsistency of advice being given to consumers regarding disposal of sanitary items.

(1)https://www.keepbritaintidy.org/sites/default/files/resource/20132_Journal%20of%20Litter%20and%20Environmental%20Quality_Vol3-V6-ONLINE.pdf.

13 Would you support an extended producer responsibility scheme for wipes containing plastic? If so, how might this operate?

No

Blank free text box for answer:

We believe that this question is poorly phrased response of Yes/No and analysis of Yes/No could be misleading and we request that the details given are utilised rather than counting Yes/No.

We do not support an Extended Producer Responsibility scheme for wipes containing plastic since we believe that these wipes should be banned. However, in addition to a ban on wet wipes containing plastic we believe that all other single-use wet wipes, regardless of material, should have Extended Producer Responsibility (EPR) applied.

Funds from EPR should be used to promote reusable alternatives and provide support to make it as easy as possible for consumers to choose reuse over single-use. EPR should be applied to all single use sanitary items, not just wet wipes. Reusable sanitary products reduce waste and have a lower carbon footprint. They can last a number of years and therefore are cost efficient in the long term, but can represent an expensive upfront cost: any measures need to be carefully implemented to ensure that they support ambitions to reduce period poverty and those living below the poverty line. Industry should also cover education of consumers and cost of campaigns for correct disposal (see below), ongoing research to verify engagement is effective, cost of clean-up (regardless of by whom the clean-up is undertaken and could include, but is not limited to, water companies, local councils, governments and their agencies and NGOs) and subsidising reusable wet wipes and other sanitary products in line with the concept of the circular economy.

14 What alternatives are there to single-use plastic wet wipes, including wipes made from non-plastic materials? We would welcome evidence on the cost of these alternatives, their environmental impact and any issues that could be caused by increased use of them.

Yes

Blank free text box for answer:

Single use wet wipes use a huge amount of resources and are carbon heavy, due to the transportation of wet material. They are packaged in plastic, typically a flexible plastic which is usually not acceptable for recycling and, where it is, results in downcycling.

Banning plastic wipes alone will not remove the issue of incorrect disposal of wipes into the sewer system. Semi-synthetic wipes are not by default suitable for flushing and have the potential to contribute to blockages and pollution as shown by the discovery of regenerated cellulose fibres in deep sea sediments, and the impact of these entering the food chain is currently unknown(1,2). In addition, it has been highlighted that cellulose is particularly prone to adsorbing heavy materials, a characteristic exploited in the waste water treatment process to prevent them escaping beyond the treatment works (3).

Therefore we need to support people in reusable wipes. This could include practical information for example to new carers, as well as financial support such as reducing initial outlay costs through VAT or direct financial support or products e.g. baby boxes, or discounts such as those already offered by some councils for reusable nappies(4). Furthermore, re-introduction of collection reusable nappy schemes should include reusable wet wipe collection,

thereby reducing the barrier of laundering- particularly for lower income households. Water companies currently provide FOG (Fat Oils and Grease) traps and investigating bathroom bins to change consumer behaviour. We suggest that companies could help their customers to move to reusable wipes by providing starter packs.

(1) <https://advances.sciencemag.org/content/6/23/eaay8493.full>

(2) Jamieson, A.J., Brooks, L.S.R., Reid, W.D.K., Piertney, S.B., Narayanaswamy, B.E., and Linley, T.D. (2019) Microplastics and synthetic particles ingested by deep-sea amphipods in six of the deepest marine into the food chain of such organisms with unknown effects

(3) Jamshaid, A., Hamid, A., Muhammad, N., et al. (2017) Cellulose-based Materials for the Removal of Heavy Metals from Wastewater - An Overview, ChemBioEng Reviews, Vol.4, No.4, pp.240-256

(4) <https://www.fill-your-pants.com/councilnappyincentives.html>

Tobacco filters

15 Do you support the government taking regulatory action to tackle littering of tobacco filters?

Yes

Blank free text box for answer:

Yes the government needs to take action. During the September 2021 Marine Conservation Society beach clean, an average of 31 cigarette butts were found per 100m. Cigarette butts were the mostly commonly identifiable litter item found on our beaches in England in the 2021 survey (plastics pieces which are from unidentifiable sources is the most prevalent thing found and made up 29% of litter found). Cigarette butts make up 8% of the litter found.

Cigarette stubs are found to take around 14 years(1) to degrade, during this time, thousands of chemicals are released (2) into the environment as well as microplastics (3). 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 it (4).

In addition, Green et al 2021 (5) 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.

MCS has been working with ASH Scotland and ASH Wales, both of whom have stated that they have been long aware that cigarette filters do not benefit health, although two thirds of smokers think that they do (6). Instead they act to make smoke smoother and more palatable. 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 negative (7).

(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://bmcpubhealth.biomedcentral.com/articles/10.1186/s12889-015-2643>

(7) https://media.mcsuk.org/documents/2021_Cigarette_Filters.pdf

16 If the government takes forward an extended producer responsibility (EPR) scheme to tackle cigarette littering, which of the following costs related to managing of littered tobacco filters, if any, do you think should be covered by producers?

campaigns aimed at promoting responsible disposal, provision of bins and management of binned filters, clearing up ground litter and subsequent treatment, data gathering and reporting, other, please specify

Blank free text box for answer:

cost of clean up in the marine environment, awareness raising

Blank free text box for answer:

We recommend that regulatory action should include a ban on plastic cigarette filters, Extended Producer Responsibility duties to be imposed on tobacco manufacturers and awareness raising of it 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 to be ineffective in reducing the amount of marine litter found (1) nor mitigate against the health crisis. Therefore, EPR must be accompanied with 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.

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

17 Are there other regulatory approaches that government should consider?

Blank free text box for answer:

18 What are the financial costs of managing waste tobacco filters? Please give supporting evidence including quantified data where possible.

Blank free text box for answer:

These include (but not limited to) cost of clean up of the cigarette butts (both voluntary and paid) as well as the disamenity costs.

19 What are the environmental impacts of waste cellulose acetate tobacco filters, including those associated with inappropriate disposal? Please give supporting evidence.

Blank free text box for answer:

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 plastic (0).

As responded in question 10- Cigarette stubs are found to take around 14 years(1) to degrade, during this time, thousands of chemicals are released (2) into the environment as well as microplastics (3). 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 it (4).

In addition, Green et al 2021 (5) 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).

(0) <https://www.keepbritaintidy.org/news/its-flicking-blue-murder>

(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>

20 What are the environmental impacts of tobacco filters made from alternative materials to cellulose acetate, including those associated with inappropriate disposal? Please give supporting evidence.

Blank free text box for answer:

Biodegradable filters have been shown to have the same toxic impact in a closed body of water in freshwater (1). The biodegradation time of biodegradable butts is 2.3-13 years compared to 7.5-14 years for conventional cigarette butts(2).

(1) <https://www.sciencedirect.com/science/article/abs/pii/S0269749120359741?via%3Dihub>

(2) Joly & Coulis 2018 <https://www.sciencedirect.com/science/article/pii/S0956053X17308474>

21 What are the environmental impacts of smoking alternatives such as heated tobacco, disposable e-cigarettes, vape pods and oral nicotine pouches, including those associated with inappropriate disposal? Please give supporting evidence.

Blank free text box for answer:

Single-use plastic sachets

22 What environmental impacts do single-use plastic sachets have? What is the evidence in support of your view?

Blank free text box for answer:

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 economical (2). 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.

(1) https://www.systemiq.earth/wp-content/uploads/2020/07/BreakingThePlasticWave_MainReport.pdf

(2) <https://www.youtube.com/watch?reload=9&v=tNtkgRkenlk&feature=youtu.be> 1hr21-22 mins into panel

23 Are you aware of any alternatives to single-use plastic sachets? Do you have any evidence to support that these alternatives are more environmentally friendly than single-use plastic sachets?

Blank free text box for answer:

We would advocate for the shift to bulk dispensers. Hotels are already moved towards this as well as the food sector.

24 Do you support consulting on introducing a ban of single-use plastic sachets used for:

Support all of the above

Blank free text box for answer:

As responded in question 17 if the CEO of Unilever a major user of these, declares that they have "no real value" for mechanical recycling and that chemical recycling is not economical (1) then this provides strong evidence for the need to implement a ban.

(1) <https://www.youtube.com/watch?reload=9&v=tNtkgRkenlk&feature=youtu.be> 1hr21-22 mins into panel

25 Do you support consulting on introducing a charge on single-use plastic sachets used for:

Support all of the above

Blank free text box for answer:

We do not support a charge because we want to see a ban because of reasons stated in question 17. If a ban was not put in place immediately, we would see a charge as an absolute minimum but this should be accompanied by a phase out date.

26 Are you aware of any other uses of single-use plastic sachets that could be considered for banning or introducing a charge on?

Blank free text box for answer:

The scope and definition of a sachet is unclear within the consultation. However, paper laminated sachets should be considered to be within scope.

27 Are you aware of any uses or situations in which the use of sachets is essential and could be considered for exemptions in any future legislation? What is the evidence in support of your view?

Blank free text box for answer:

We know of no exemptions required but guidance should be gathered from the professional medical sector on any infection control issues.

Single-use cups

28 Would you support the government consulting on a proposal to introduce a charge for single-use cups?

Yes

Blank free text box for answer:

"Coffee" cups are difficult to recycle- requiring specialist equipment, meaning that very few are recycled. In 2017 the Environmental Audit committee found that only 0.25% were recycled across the UK(1). Industry's response to this was to set a disappointingly low target of 8% by 2019 which they have so far failed to achieve, reaching only 6%(2). We would highlight that these products are part of a linear make-use-throw economy and even with industry setting its own low target of 8% it was still unable to achieve a basic recycling rate. In line with the waste hierarchy reusables need to be encouraged. Research by Cardiff University showed that charging was considerably more effective than a discount(3). We recommend a minimum charge of 25p on all single-use beverage cups as was recommended by EPECOM and the Environmental Audit Committee(4) along with a target for reduction.

(1) <https://publications.parliament.uk/pa/cm201719/cmselect/cmenvaud/657/65705.htm>

(2) <https://www.foodservicefootprint.com/disposable-cup-recycling-group-misses-8-target/>

(3) <http://orca.cf.ac.uk/99366/1/Coffee%20cup%20summary%20report%20-%20Poortinga%20%28FINAL%29.pdf>

(4) <https://committees.parliament.uk/committee/62/environmental-audit-committee/news/100314/mps-call-for-latte-levy-on-coffee-cups/>

29 Do you think this charge should be for both hot and cold drinks?

Yes

Blank free text box for answer:

The reason for charges on single use cups would be that they don't align with the circular economy and our need to use resources more efficiently. Therefore this applies regardless of the type of drink they contain.

30 Do you think this charge should apply to businesses of all sizes?

Yes

Blank free text box for answer:

The carrier bag charge when announced in England in 2015 was only for larger retailers but this was amended in 2021 to include all retailers. We suggest that the government should provide a consistent system for retailers from the outset and therefore there are no "unintended" loopholes.

31 Are you aware of any situations where the use of a single-use cup is essential and could be considered for exemptions from the charge in the future? E.g., because of business location, business type, type of product in the cup. Please give reasons and supporting evidence.

Blank free text box for answer:

No though we recommend the consultation and gathering of expert views from medical experts and to ensure accessibility.

Additional items

32 Please state any further single-use plastic items that you think should be considered for targeted future policy actions, and your reasons for this.

Blank free text box for answer:

We support future targeted actions to reduce single use plastic items, we would urge for a shift in approach from an adhoc "item by item" to one which is more systemic. We need to see reduction and refill targets which would by de facto help drive down plastic items and have an integrated efficient circular economy.

If the government considers solely by item, then we would recommend actions on the following:

Single use water bottles- restaurants, cafes etc. should only be able to provide a refillable system. This change would reduce the amount of single use and help switch to a low carbon system.

Takeaway (fast-food) containers- the takeaway and fast food industry market size is expected to increase 9% in 2022 (1). Therefore it is expected that the containers used would increase in proportion. Many of these containers are not focused on either recyclability and only very limited outlets provide a reusable option (2,3).

Single use nappies: As highlighted by the Nappy Alliance in previous submitted written evidence to the plastic waste inquiry "In the UK alone, around 3.6 billion single-use nappies are sent to landfill or incinerated annually. They comprise around 8% of residual waste in England, costing local authorities over £140 million per year for disposal. This figure does not include the rest of the UK or soiled nappies collected from nurseries or hospitals."(4)

Single use nappies have a much higher environmental impact when comparing over the entire lifecycle. Zero Waste Europe in 2019 found that reusable nappies use 98% fewer raw materials and generate 99% less waste, and found that if just 20% of babies switched to reusable nappies full time, over one million tonnes of waste could be prevented per year. Reusable nappies could also save families money (up to €2,000 per child) (5).

(1)

<https://www.ibisworld.com/united-kingdom/market-size/takeaway-fast-food-restaurants/#:~:text=UK%20in%202022%3F-,The%20market%20size%20of%20the%20>

(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/>

(4) <https://committees.parliament.uk/writtenevidence/38844/html/>

(5) https://zerowasteurope.eu/wp-content/uploads/2019/12/bffp_single_use_menstrual_products_baby_nappies_and_wet_wipes.pdf

33 Regarding any additional items that you have provided, are you aware of any environmentally friendly alternatives that could be used instead?

Blank free text box for answer:

For single use nappies we would advocate strongly a switch to reusable nappies.

For takeaway containers- we advocate for reuse systems.

Re-use and Refill

34 What are the barriers to reuse and how could they be addressed? Please provide any supporting evidence.

Blank free text box for answer:

MCS references the separate detailed response submitted for this consultation by WCL for this question.

We add an additional comment that mitigation measures should be put in place for the often the higher upfront costs to support those from lower incomes.

35 What are the barriers to refill and how could they be addressed? Please provide any supporting evidence.

Blank free text box for answer:

MCS references the separate detailed response submitted for this consultation by WCL for this question.

We add an additional comment that mitigation measures should be put in place for the often the higher upfront costs to support those from lower incomes.

36 How can government incentivise increased reuse and refill?

Blank free text box for answer:

MCS references the separate detailed response submitted for this consultation by WCL for this question.

We highlight that it is important to reduce initial start up costs and provide disincentives for single use.

37 How could businesses incentivise customers to support reuse and refill?

Blank free text box for answer:

A charge on single use items- as responded in question 23, research by Cardiff University showed that charging was considerably more effective than a discount(1). Therefore it is important to utilise the best behavioural change data available.

Crucially by making reuse and refill the norm e.g. offering same brands and at the same (or lower) price, it will enable more customers to utilise refill.

(1) <http://orca.cf.ac.uk/99366/1/Coffee%20cup%20summary%20report%20-%20Poortinga%20%28FINAL%29.pdf>

38 Please provide information about any successful case studies of reuse and refill.

Blank free text box for answer:

MCS references the separate detailed response submitted for this consultation by WCL, which has provided detailed case studies.

39 Would you support the government consulting on regulating that restaurants cannot provide customers with any single-use products in eat-in settings? The existing exemption for straws would remain.

Yes