

Wildlife and Countryside Link evidence to Environmental Audit Committee inquiry:

Chinese waste import ban

January 2018

Wildlife and Countryside Link (Link) brings together 47 environment and animal protection organisations to advocate for the conservation and protection of wildlife, countryside and the marine environment.

Our members practice and advocate environmentally sensitive land management, and encourage respect for and enjoyment of natural landscapes and features, the historic and marine environment and biodiversity. Taken together we have the support of over eight million people in the UK and manage over 750,000 hectares of land.

A number of our members have been campaigning individually and in collaboration on plastic pollution for many years. To date, together they have risen awareness and provided evidence on the issue of [microbeads](#), [disposable packaging](#) – including coffee cups and deposit return schemes. This ban will have implications for plastic pollution in the UK and around the world so members have drafted the below response to this inquiry also.

This response is supported by the following ten Link members:

- Buglife
- Campaign to Protect Rural England (CPRE)
- Environmental Investigation Agency (EIA)
- Friends of the Earth England
- Greenpeace UK
- Marine Conservation Society (MCS)
- ORCA
- Royal Society for the Protection of Animals (RSPCA)
- Whales and Dolphin Conservation (WDC)
- World Wildlife Fund (WWF)

Inquiry response

How much waste within the banned categories does the UK currently export abroad, and what proportion is sent to China?

Investigations by Greenpeace's investigative journalism arm *Unearthed* have revealed that the UK exports around two-thirds of the one million tonnes of plastic collected for recycling each year ([source](#)). Between 2012 and September 2017, the UK exported 2.7 million tonnes of plastic waste to China and Hong Kong ([source](#)). Waste charity WRAP estimate that household plastics sent to mainland China and Hong Kong account for about a quarter of the plastic waste the UK exported in 2016.

The UK recycling industry has warned that between 280,000 and 320,000 tonnes of plastic packaging waste per year from the UK will be affected by the China import ban ([source](#)).

What short term and long term issues will the Chinese ban create for waste management and recycling in the UK?

The Chinese ban creates a number of short-term issues for waste management and recycling in the UK:

1. Local authorities responsible for delivering waste and recycling services will face higher gate fees – the charge levied upon a given quantity of waste received at a waste processing facility – as sorting will have to be completed to higher standards. This is in a context in which local authority budgets are under pressure from cuts in central government funding.
2. The loss of the main ‘market’ for waste exports will lower the price local authorities receive for waste materials.
3. As a result of the above two factors, local authorities may have to limit the range of waste collected for recycling, for example, hard to recycle plastics.
4. Waste management companies will explore alternative destinations for UK waste exports. However, there is limited capacity for absorbing waste streams internationally, and there will be competition to access this capacity from other waste exporting countries also affected by the China import ban, including the US, Canada and Germany.
5. As a result of the above, there will inevitably be increased incineration and landfill of plastic waste in the UK – with the accompanying environmental hazards (see below).
6. Trade representatives have warned that lower grade plastics are already piling up in the yards of waste processing facilities in the UK ([source](#)) and around the world ([source](#)).

In the medium term, the UK’s response to China’s import ban must be governed by the waste hierarchy of remove, reduce, reuse and recycle. This means removing non-recyclable or hard to recycle plastics from the UK market, reducing and ultimately eliminating single-use plastics in circulation, designing products for reuse rather than disposal, and investing in domestic recycling capacity.

As the Secretary of State for Environment, Food and Rural Affairs Michael Gove has said, the UK needs to “stop offshoring our dirt” ([source](#)). At present however, the UK does not have enough domestic capacity to handle its own waste, with a number of reprocessors having gone out of business in recent years. Some in the recycling industry have blamed this on the fact that the Packaging Recovery Note/Packaging Export Recovery Note system treats exports with parity to domestic processing. This puts domestic processors at a disadvantage owing to much lower labour costs internationally. Moreover, the UK’s current compliance fee under the Packaging Recovery Note system contributes less than 10% of the cost of collecting, sorting and disposing of packaging, with calls for reform involving full cost coverage, eco-modulation of fees and greater transparency such that (1) the increased revenue can be used to invest in domestic reprocessing and collection services; and (2) the system financially incentivises producers to only produce packaging that can be easily reused or recycled within the UK’s recycling infrastructure ([source](#))

What are the environmental implications of the Chinese ban?

As noted above, the China ban will almost certainly result in more plastic sent to landfill in the UK. Runoff from landfill and spillage on collection are key pathways through which ‘correctly’ disposed of plastics enter the ocean ([source](#)).

Once in the ocean, plastics break down into smaller fragments, causing an ingestion hazard for marine life. The United Nations Environment Programme (UNEP) estimates that plastic in the ocean is responsible for the deaths of hundreds of thousands of sea creatures each year

([source](#)), and at least 800 marine species and 170 seafood species have ingested plastic ([source](#)).

Bottle tops have been a particularly visible problem among the plastic eaten by 90% of seabirds ([source](#)). As plastics break down into microplastics in the marine environment, these fragments are also at risk of leaching toxic chemicals into the surrounding water and attracting chemicals from seawater, such as persistent organic pollutants, onto their surface, which can harm marine life when ingested ([source](#)). Recent studies have found microplastics in oysters and mussels, ([source](#)) as well as fish, with the Environmental Audit Committee last year noting that, “If someone eats six oysters, it is likely they will have eaten 50 particles of microplastics” ([source](#)).

A recent article in the Lancet reported that 83% of drinking water sampled worldwide contains fragments of plastic, and called for political leadership to urgently reduce the use of microplastics and to understand the effects of these particles on both ecosystems and the human body ([source](#)).

The China ban will likely lead to more incineration of plastics in the UK. However, incineration creates toxic chemicals and heavy metals, and incineration of plastic for energy is a high carbon, non-renewable way of generating electricity. The National Infrastructure Commission has warned against increased use of plastics in energy from waste facilities due to the implications for greenhouse gas emissions ([source](#)). Further, building incinerators creates a market over the next twenty years for single use plastics, when efforts should be directed towards reducing financial incentives to produce single use plastics in the first place.

Increases in global plastic consumption and support for the fossil fuel industry

To fill the demand gap left by import restrictions, many market commentators are predicting that China will greatly increase use of primary raw materials. The country has already begun investing in virgin plastic to replace recycled plastic stocks ([source](#)). Imports for virgin polyethylene were up 19% in 2017, as scrap polyethylene imports dropped 11% ([source](#)). IHS Markit expects China’s polyethylene demand to grow by 6.6% from 2017 to 2018, outpacing Asia’s overall growth of 5.5% ([source](#)).

Similar trends are being seen globally. Taking advantage of low gas prices, chemical producers have invested \$185 billion to build new capacity in the US, with Mark Lashier, the CEO of Chevron Phillips Chemical in November 2017 stating “*It’s a good time to be bringing on some new assets... If you pull recycled plastic out, that market demand is going to increase*” ([source](#)).

While China’s stated reasons for the import ban include improving environmental and public health, it seems that this objective and China’s commitments under the Paris Agreement may be undermined through the boost in production of virgin polymers that supports the fossil fuel industry. While the UK does not have direct control over these outcomes, there are avenues through which it may be able to promote solutions: for example, by advocating for an international framework on plastics and plastic pollution, during bilateral post-Brexit trade deals and negotiations with China, and through the proposed China-EU climate pact.

What preparations has the UK Government made ahead of the Chinese ban and are these preparations sufficient to deal with the degree of change the ban will cause?

In September 2017, Defra officials met with representatives of the recycling industry to discuss the effects of the Chinese import ban ([source](#)). Recycling industry representatives told Defra that at least 50% of the export market would be affected, either from shipments to China directly, or from indirect impacts on markets in other countries. A week after the meeting, Recycling Association's Simon Ellin wrote to Defra: "I simply cannot stress enough the impact this will have on the UK industry supply chain if these changes are brought in, in their current form." He urged the government to lobby China, writing: "I believe that direct contact with China is absolutely imperative at the earliest possible opportunity." ([source](#)).

However, when the Environmental Audit Committee questioned Michael Gove on the effects of the China ban on October 31st, he responded: "I don't know what impact it will have. It is... something to which—I will be completely honest—I have not given sufficient thought."

Have there been preparations to export waste elsewhere? What degree of control does the UK have over how waste is handled once it has been exported?

88-95% of ocean plastic comes from land-based sources. Over half of that originates in just five countries: China, Indonesia, the Philippines, Thailand and Vietnam ([source](#)) and via only 10 rivers ([source](#)). However, UK Trade Info statistics reveal that China (including Hong Kong), Indonesia and Vietnam were also among the top five recipients of UK plastic waste exports in 2016 ([source](#)). Michael Gove has indicated more plastic waste may be exported to Vietnam in response to the Chinese restrictions ([source](#)) and the recycling industry has indicated it is looking to Indonesia as an alternative destination.

This means that the UK exports plastic waste to countries already overwhelmed with managing their own waste, where resources would arguably be better used collecting and recycling domestically generated waste. Indeed, China cites the need to increase the amount of recycled domestic solid waste as one rationale for its introduction of the import ban ([source](#)).

European law requires national authorities to prohibit the export of waste to countries where there are grounds to believe waste will not be managed in accordance with human health and environmental protection standards that are broadly equivalent to standards established in EU legislation (Regulation (EC) No 1013/2006 Of The European Parliament And Of The Council, Art. 49). However, the Environment Agency does not conduct remote monitoring and enforcement of standards, and there is evidence that standards in China can fall dramatically below EU equivalent standards. For example, the documentary *Plastic China* ([source](#)) reveals conditions in which children recycle plastic waste with their bare hands. As such, the UK has little control in practice over how waste is handled once exported.

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