

## **Consultation on proposals to ban the distribution and/or sale of plastic straws, plastic stemmed cotton buds and plastic drink stirrers in England: A joint NGO response**

*December 2018*

Fauna & Flora International prepared this response. It is supported by Wildlife and Countryside Link (Link), the largest environment and wildlife coalition in England, bringing together 49 organisations to use their strong joint voice for the protection of nature. Our members campaign to conserve, enhance and access landscapes, animals, plants, habitats, rivers and seas. Together they have the support of over eight million people in the UK and directly protect over 750,000 hectares of land and 800 miles of coastline.

Alongside Fauna & Flora International, the following organisations support this response:

- A Rocha UK
- Association to Protect Rural Scotland
- Buglife
- Campaign to Protect Rural England
- Earthwatch Europe
- Environmental Investigation Agency
- Friends of the Earth
- Greenpeace
- Humane Society International
- International Fund for Animal Welfare
- Institute for Fisheries Management
- Marine Conservation Society
- MARINELife
- ORCA
- RSPCA
- The Wildlife Trusts
- Whale and Dolphin Conservation
- WWF
- Zoological Society of London (ZSL)

### **Introduction**

Whilst we applaud the Government's intentions to legislate on the sale and distribution of plastic straws, cotton buds and stirrers and strongly support a ban on these items, these are but small elements of the wider plastic crisis that the UK Government and its international counterparts are facing. Excessive production driven by unsustainable demand for plastic materials coupled with significant limitations in waste recapturing processes and recycling capability has resulted in widespread, persistent accumulation of plastic in the natural environment. As is the case with all natural systems facing undue anthropogenic stress, the impact of plastic pollution poses far-reaching implications for both marine and terrestrial ecosystems and the biodiversity they support.

Plastic pollution is now abundant in all the world's oceans and is found throughout the water column - floating on the sea surface, accumulating in deep-sea trenches and sediments and

sequestered in polar sea ice<sup>1</sup>. Up to 12 million metric tonnes of plastic leak into the oceans each year, a figure that could treble by 2025<sup>2</sup>. To date, there is scientific evidence that this pollution affects some 800 species<sup>3</sup>, through entanglement and ingestion, but the reality is likely to be much greater.

Plastic pollution is also prevalent in terrestrial and freshwater ecosystems, threatening wildlife, affecting local communities and blighting the landscape. With approximately 80% of the plastic pollution found in marine ecosystems originating on land, solutions need to tackle the pollution at their terrestrial source<sup>4</sup>. Furthermore microplastic contamination of land is an estimated 4-32 times larger than in our oceans<sup>5, 6</sup>. This is in part due to agricultural practices such as spreading of sewage sludge, which is estimated to contribute 43,000-63,000 tonnes of microplastics annually to European farmlands<sup>7</sup>.

Plastic pollution has become so prevalent it is now an area of concern for human health too. The World Economic Forum has highlighted the '*huge volume of plastic waste in the world's water*'<sup>8</sup>, the ubiquity of microplastics, and the possibility that they are finding their way to the human body bringing toxic chemicals with them<sup>9</sup>.

Plastic is also a key contributor to fossil fuel production. 6% of global oil production comes from plastic production<sup>10</sup>, equivalent to that produced by the aviation industry. Therefore, by tackling plastic production the UK has an opportunity to reduce its CO<sub>2</sub> emissions further, in line with the Climate Change Act.

Despite the impacts of plastic pollution, the UK's contribution to plastic waste globally is increasing. Current plastic waste, estimated at 5.2 million tonnes in 2018, is forecast to rise by a further 20% to around 6.3 million tonnes in 2030<sup>11</sup>.

About 90% of the costs of dealing with plastic waste is borne by local authorities rather than the producers of plastic items<sup>12</sup>. This puts a significant burden on local authority budgets and affects

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<sup>1</sup> Obbard, R., Sadri, S., Wong, Y., Khitun, A., Baker, I. & Thompson, R. 2014. Global warming releases microplastic legacy frozen in Arctic Sea ice. *Earth's Future*, 2, 315–320; Chiba et al., 2018. Human footprint in the abyss: 30 year records of deep sea plastic debris. *Marine Policy*, available [online](#)

<sup>2</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/706956/foresight-future-of-the-sea-report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/706956/foresight-future-of-the-sea-report.pdf)

<sup>3</sup> CBD, 2016. *Marine Debris: Understanding, Preventing and Mitigating the Significant Adverse Impacts on Marine and Coastal Biodiversity*. Technical Series No.83. Secretariat of the Convention on Biological Diversity, Montreal, 78 pages. Available [here](#)

<sup>4</sup> Gionfra, S. 2018. *Plastic Pollution in Soil*. 18 Pages. Available [here](#).

<sup>5</sup> Horton, A. A., Walton, A., Spurgeon, P. J., Lahive, E. and Svendsen, C. 2017. 'Microplastics in fresh water and terrestrial environments - evaluating the current understanding to identify the knowledge gaps and future research priorities', *Science of the Total Environment*. Available [here](#).

<sup>6</sup> Machado, A., Kloas, W., Zarfl, C., Hempel, S. and Rilling, M. C. (2017) 'Microplastics as an emerging threat to terrestrial ecosystems', *Global Change Biology*. Available [here](#).

<sup>7</sup> Nizzetto, L., Futter, M. and Langaas, S. (2017) 'Are agricultural soils dumps for microplastics of urban origins?' *Environmental Science & Technology*. Available [here](#)

<sup>8</sup> <https://www.weforum.org/reports/the-global-risks-report-2018>

<sup>9</sup> Hahladakis, J.N., Velis, C.A., Weber, R., Iacovidou, E., Purnell, P., 2018. *An overview of chemical additives present in plastics: Migration, release, fate and environmental impact during their use, disposal and recycling*. *J. Hazard. Mater.* 344, 179-199.

<sup>10</sup> [http://www3.weforum.org/docs/WEF\\_The\\_New\\_Plastics\\_Economy.pdf\\_page\\_13](http://www3.weforum.org/docs/WEF_The_New_Plastics_Economy.pdf_page_13).

<sup>11</sup> WWF, 2018. *Plastic consumption and waste management* (Commissioned from Eunomia). Available online at: [https://www.wwf.org.uk/sites/default/files/2018-03/WWF\\_Plastics\\_Consumption\\_Report\\_Final.pdf](https://www.wwf.org.uk/sites/default/files/2018-03/WWF_Plastics_Consumption_Report_Final.pdf)

<sup>12</sup> [http://ec.europa.eu/environment/waste/pdf/target\\_review/Guidance%20on%20EPR%20-%20Final%20Report.pdf](http://ec.europa.eu/environment/waste/pdf/target_review/Guidance%20on%20EPR%20-%20Final%20Report.pdf)

spending on other key social and public issues. In many other EU countries, producers take on 90% - 100% of the costs of dealing with the end of life collection and disposal of their products.

There is huge public concern about plastic pollution and a great appetite to put in place actions to stop the proliferation of plastics in the environment. Concerns about plastic pollution are also high on the agenda of governments around the world as well as the EU, United Nations, G7<sup>13</sup> and World Economic Forum. If the UK is serious about being a world leader on ocean conservation then Government needs to build on this momentum to ensure effective policies are put into place to stop the plastic flow.

In order to adequately tackle this problem, we urge the UK Government to devise a set of interlinking policies and fiscal measures that address the key drivers of plastic pollution. **The proposed ban on the distribution and/or sale of plastic straws, plastic-stemmed cotton buds and plastic drink stirrers in England should be seen as one measure in a much broader strategy to prevent pollution at the source.**

A holistic UK plastics strategy should be an intrinsic part of the anticipated UK Waste and Resources strategy and should complement and reinforce the commitment made by the HM Treasury in the November budget.<sup>14</sup> We ask that the Government implement a holistic system that complements action elsewhere, including but not limited to action at the European Union<sup>15</sup>, the Commonwealth Clean Oceans Alliance<sup>16</sup>, the G7<sup>17</sup> and the G20<sup>18</sup>.

Integrated solutions for mitigating plastic pollution must prioritise a reduction in the production and consumption of plastics, phasing out all but the safest and most essential single-use plastics (SUPs) as a starting point. At a minimum, the UK should match the more extensive list of items identified under the proposed '*Directive of the European Parliament and of the Council on the reduction of the impact of certain plastic products in the environment*'. This list includes in addition to those items currently being consulted upon:

- Cutlery (forks, knives, spoons, chop sticks)
- Plates
- Sticks to be attached to and support balloons.

Other SUPs with a high propensity to be found in marine litter that the UK should additionally consider banning, following a thorough review of and consultation on items in scope and unintended consequences of alternatives, include:

- Single-use plastic shopping bags, including single use carrier bags and single use produce bags (with a careful consideration of additional measures such as any charges or other measures on bags of alternative materials and associated implications for public health)
- A ban on intentional balloon releases.

Additional SUP items that are prevalent in the environment and should be considered for reduction targets, which could be achieved through incentivised reuse, recycling or innovation around alternatives, include:

- SUP food containers incl. fast food containers
- SUP beverage containers and their caps/lids

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<sup>13</sup> <https://g7.gc.ca/wp-content/uploads/2018/06/OceanPlasticsCharter.pdf>

<sup>14</sup> <https://www.gov.uk/government/publications/single-use-plastics-budget-2018-brief>

<sup>15</sup> [http://ec.europa.eu/environment/waste/plastic\\_waste.html](http://ec.europa.eu/environment/waste/plastic_waste.html)

<sup>16</sup> <https://bluecharter.thecommonwealth.org/action-groups/marine-plastic-pollution/>

<sup>17</sup> <http://sdg.iisd.org/news/five-g7-countries-and-eu-pledge-to-tackle-pollution-in-ocean-plastics-charter/>

<sup>18</sup> <https://ieep.eu/news/g20-adopts-t20-recommendations-on-plastics-and-marine-litter>

To tackle the plastics problem, we strongly urge the Government to implement novel legislation within a broader UK plastic strategy. This should introduce measures to facilitate the transition to a circular economy based on the waste hierarchy principles, emphasising prevention of waste in the first instance, followed by redesign, reuse and subsequently, provisions for recapture and recycling. For more information on our proposals for tackling the plastics problem through bans, taxes and charges, see the Link response to the Treasury consultation on tackling plastic pollution<sup>19</sup> and their briefing on tackling SUPs in the Autumn Budget 2018<sup>20</sup>.

## Answers to consultation questions

### Part A: Plastic drinking straws

#### 6. Do you support the proposal to introduce a ban on the distribution and/or sale of plastic drinking straws in England?

We support the proposed ban.

Plastic drinking straws are regularly reported amongst the top ten most common items recorded on beaches around the globe<sup>21</sup>. It is estimated that 8.5 billion plastic straws are used per year in the UK<sup>22</sup>, many of which are used once and for as little as 20 minutes before being discarded into waste streams destined for landfill. This low-value, low-cost item epitomises the throwaway culture that is today catered for by SUPs. This linear economy fails to meet any of the principles of the waste hierarchy and as such, should be deemed a 'pointless use of plastic'.

We fully support the proposed ban on the distribution and sale of plastic drinking straws (excepting certain situations such as medical-enabling and other specialist uses) in England because:

- a. Plastic straws in the marine and terrestrial environment are known to negatively impact wildlife<sup>23</sup>;
- b. Reusable alternatives are readily available<sup>24</sup>; and
- c. Industry has demonstrated that change is possible and that alternatives are commercially viable<sup>25</sup>.

In line with the basic principles outlined in our introductory text, we urge the Government to issue supplementary recommendations to businesses suggesting a change in practice that would result in non-plastic straws being issued upon request only as opposed to being standard issue in drinks sold. We also recommend introducing a charge for the non-plastic single use alternatives. As the success of the 5p carrier bag charge shows, small financial incentives can dramatically reduce the use of single-use items. This abides by the first and most important of the waste hierarchy principles which emphasises prevention of waste above all other measures.

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<sup>19</sup>

<https://www.wcl.org.uk/docs/Wildlife%20and%20Countryside%20Link%20submission%20to%20tackling%20the%20plastic%20problem%20consultation.pdf>

<sup>20</sup> <https://www.wcl.org.uk/docs/Wildlife%20&%20Countryside%20Link%20plastics%20Autumn%20budget%20briefing.pdf>

<sup>21</sup> International Coastal Clean Up 2017

[https://oceanconservancy.org/wp-content/uploads/2017/06/International-Coastal-Cleanup\\_2017-Report.pdf?utm\\_medium=Print&utm\\_source=pwgoto](https://oceanconservancy.org/wp-content/uploads/2017/06/International-Coastal-Cleanup_2017-Report.pdf?utm_medium=Print&utm_source=pwgoto)

<sup>22</sup> <http://www.eunomia.co.uk/reports-tools/leverage-points-for-reducing-single-use-plastics-background-research/>

<sup>23</sup> <https://www.telegraph.co.uk/news/2016/03/22/plastic-straw-removed-from-turtles-nose-by-marine-biologists-in/>

<sup>24</sup> <https://thelastplasticstraw.org/resources/>

<sup>25</sup> <https://www.thesun.co.uk/money/6090727/ban-on-plastic-straws-theresa-may-cotton-buds-environment/>

A recent survey found that eight out of the ten largest British supermarkets have already committed to end the sale of plastic straws (with M&S having removed them from cafes, although not yet from the shelf)<sup>26</sup>. This sign of corporate action overtaking legislative ambition demonstrates that a ban is both feasible and acceptable to major retailers. It also suggests that the government could be much more ambitious in the scope of its strategy to prevent pollution at the source.

**7. Do you agree with our proposed date for the ban (October 2019)?**

Yes.

**8. Do you support a ban on beverage carton straws?**

Yes, as these straws pose the same problem as those which are not attached to beverage cartons. Instead of making an exception for these products, the government should incentivise manufacturers to focus on packaging redesign, based on reusable/ refillable formats.

**9. Should the government begin with a targeted ban on the distribution of straws with a longer-term view to extending it?**

We do not support this.

We ask that the Government pursue the most stringent legislative options available to demonstrate its commitment to becoming a world leader in tackling plastic pollution. In this case, the strongest legislative option would be to issue a ban on the sale and distribution of SUP straws from October 2019.

It is important to note that disability rights groups, such as One in Five, are concerned that bans on certain items such as plastic straws could be detrimental to certain citizens, and therefore are calling on manufacturers to produce an environmentally friendly flexible non-plastic straw that is suitable for hot and cold liquids. We encourage the government to support this innovation.

Ideally, the legislative tool being developed would be a single-use plastic regulation banning single-use plastic straws, cotton bud sticks and drinks-stirrers from October 2019 with a future extension to the regulation, following consultation that would further ban other known, problematic SUPs for which alternatives exist.

**10. If pursuing a broader ban including the sales of straws, do you agree with the proposal to exempt plastic straws for medical-enabling and other specialist uses from any ban?**

Disability rights groups, such as One in Five, are concerned that bans on certain items such as plastic straws could be detrimental to certain citizens, and therefore are calling on manufacturers to produce an environmentally friendly flexible non-plastic straw that is suitable for hot and cold liquids. We encourage the government to support this innovation.

**17. Do you agree that the ban should cover all compostable and biodegradable plastic (such as PLA)?**

We agree that the ban should cover these plastics.

All types of plastic should be considered problematic due to the risk they pose to biodiversity, such as entanglement that can suffocate, pseudo-satiation that can starve animals or leaching of toxic

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<sup>26</sup> Greenpeace and the Environmental Investigation Agency, 2018. Checking out on plastics. Available online: <https://checkingoutonplastics.org/wp-content/uploads/2018/11/Checking-out-on-plastics.pdf>

chemicals that can compromise the health of animals and for these reasons, all compostable and biodegradable plastics such as PLA should be included in the ban. There is no internationally-agreed standard for 'marine biodegradable' plastic.<sup>27</sup>

The required conditions for biodegradation are unlikely to occur in marine environments, resulting in a significantly slower degradation rate in marine environments, and therefore will likely incur the same negative environmental impacts as other plastics in terms of impacts on marine species.<sup>28</sup> Additionally, biodegradable or compostable plastics typically require the high temperatures of industrial composting facilities and as such do not breakdown in the terrestrial environment. Furthermore, the infrastructure is not in place to collect and process these products in the UK, they cannot be recycled and labelling suggesting something is compostable or biodegradable may lead people to believe they will breakdown if littered in the natural environment.

Therefore, at this stage, biodegradable, bio-based and compostable plastics do not offer a solution to the plastic pollution problem and could propagate linear material flows instead of facilitating transition to a more circular plastics economy.

Their wide-scale adoption could present additional problems such as complicating waste collection and recycling systems, as well as causing microplastic pollution if the conditions required for full biodegradation are not met<sup>29</sup>. Most bio-based plastics are produced from agro-based feedstock,<sup>30</sup> requiring an estimated 600,000 hectares to produce 1.6 million tonnes in 2013 – a fraction of the total demand for plastics (< 0.5% of 2015 total demand)<sup>31</sup>. If their production is scaled up, land-use demands could bring about competition with agriculture and cause biodiversity loss<sup>32</sup>. In summary, in the absence of an agreed standard and focusing on the need to reduce, we strongly warn against the adoption of non-conventional plastics for all but the most well adapted purposes.

#### **19. Do you anticipate any additional costs and or constraints to industry from this proposed ban?**

While we recognise that there may be some short-term costs associated with transitioning to non-plastic straw alternatives, we do not anticipate any long-term additional costs or constraints to industry from the proposed ban. It is also noteworthy that eight out of ten major British grocery retailers have banned the sales of plastic straws, showing that the move is both feasible and acceptable to industry<sup>33</sup>.

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<sup>27</sup> Biodegradable plastics & marine litter: misconceptions, concerns and impacts on marine environments. UNEP. Feb 2016. [https://wedocs.unep.org/bitstream/handle/20.500.11822/7468/-Biodegradable Plastics and Marine Litter Misconceptions, concerns and impacts on marine environments-2015BiodegradablePlasticsAndMarineLitter.pdf.pdf?sequence=3&isAllowed=y](https://wedocs.unep.org/bitstream/handle/20.500.11822/7468/-Biodegradable%20Plastics%20and%20Marine%20Litter%20Misconceptions,%20concerns%20and%20impacts%20on%20marine%20environments-2015BiodegradablePlasticsAndMarineLitter.pdf.pdf?sequence=3&isAllowed=y)

<sup>28</sup> Biodegradable plastics & marine litter: misconceptions, concerns and impacts on marine environments. UNEP. Feb 2016. [https://wedocs.unep.org/bitstream/handle/20.500.11822/7468/-Biodegradable Plastics and Marine Litter Misconceptions, concerns and impacts on marine environments-2015BiodegradablePlasticsAndMarineLitter.pdf.pdf?sequence=3&isAllowed=y](https://wedocs.unep.org/bitstream/handle/20.500.11822/7468/-Biodegradable%20Plastics%20and%20Marine%20Litter%20Misconceptions,%20concerns%20and%20impacts%20on%20marine%20environments-2015BiodegradablePlasticsAndMarineLitter.pdf.pdf?sequence=3&isAllowed=y)

<sup>29</sup> EIA, Unpacking non-conventional plastics. Available at: <https://eia-international.org/report/unpacking-non-conventional-plastics/>

<sup>30</sup> Ißbrücker, C., 2018. How much land do we really need to produce bio-based plastics? Available at: <https://www.european-bioplastics.org/how-much-land-do-we-really-need-to-produce-bio-based-plastics/>

<sup>31</sup> Bioplastics, 2015. *Frequently Asked Questions on Bioplastics*. Available at: <https://www.corbion.com/base/DownloadHelper/DownloadFile/7462>

<sup>32</sup> CE Delft, 2017. *Biobased Plastics in a Circular Economy Policy suggestions for biobased and biobased biodegradable plastics*. Available at: <https://www.rijksoverheid.nl/binaries/rijksoverheid/documenten/rapporten/2017/10/24/biobased-plastics-in-a-circular-economy/biobased-plastics-in-a-circular-economy.pdf>

<sup>33</sup> Greenpeace and the Environmental Investigation Agency, 2018. *Checking out on plastics*. Available online: <https://checkingoutonplastics.org/wp-content/uploads/2018/11/Checking-out-on-plastics.pdf>

A wide range of alternatives to SUP straws is already known to exist. It is anticipated that as demand for non-plastic straws increases because of the ban coming into effect, the price per unit of non-plastic straws will continue to fall. In addition if straws are only given out on request, the number of straws required will fall, further reducing costs.

We support the Government's notion - outlined in its impact assessment for this consultation - that there are additional (negative) environmental and societal costs associated with SUP straws, and therefore, the physical cost of non-plastic alternatives needs to be assessed against the environment benefits brought about by a transition to more sustainable materials.

**20. Should we expect non-plastic straw use/ consumption to decrease?**

Not unless the Government takes action.

Demand for paper straws has already increased by 4,900%.<sup>34</sup> The only way to reduce this demand is for Government to issue strong guidance as well as the introduction of charges on non-plastic single use alternatives that discourage companies from issuing straws and people from using these single use items – regardless of material – in the first place. Without these charges or Government-issued guidelines, we cannot expect that there will be a decrease in non-plastic straw use or consumption. At present, there is widespread public interest in - and awareness of plastic pollution and as such, a number of behaviour change campaigns tackling specific issues like straw use have emerged. This has had a positive impact in terms of behaviour change (i.e. switch to non-plastic straws and straw refusal). Sustaining behaviour change campaigns indefinitely is impractical, costly and can be counter-productive.

**21. Our proposals for enforcement are that the ban will be enforced through civil sanctions set out in Part 3 of the Regulatory Enforcement and Sanctions Act 2008. How should compliance with the ban be monitored? Who should enforce the ban? (for example, Local Authorities, Trading Standards or Office for Product Safety and Standards)**

Compliance with the ban should be monitored via trading standards or another statutory body. Currently NGOs monitor voluntary commitments but this is both impractical and prohibitively expensive to continue indefinitely. There should be a legal requirement that compliance be monitored by a statutory agency.

**22. Are there any risks that alternatives to plastic straws will themselves have significant environmental impacts? If so, how could these risks be avoided, minimised or mitigated? Please supply any evidence you may have to support your suggestions.**

Yes.

It is imperative that the full environmental impact of all materials being introduced as alternatives to plastic straws be assessed across the entire life cycle of the product, including their impact when leakage occurs to the environment, to avoid the introduction of further detrimental environmental impacts. The definition of plastic used to underpin the proposed legislation must be broad enough to include conventional plastics and all derivatives. 'Biodegradable', 'bio' and 'compostable' plastics should not be considered safe alternatives to conventional plastic and should thus be included in the proposed ban on 'plastic' straws. These alternative materials may behave in the same manner as

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<sup>34</sup> <https://www.inc.com/emily-canal/plastic-straw-ban-paper-straw-company.html>

conventional plastic once in the environment, thus posing the same risks for biodiversity<sup>35</sup> and exacerbating the already critical issue of microplastic pollution.

Where non-plastic alternatives are sourced for use as straws, e.g. FSC-certified paper, the paper should be responsibly resourced, be sure to meet minimum standards and avoid the introduction of unintended consequences<sup>36</sup>. Additionally, to avoid like for like substitution by swapping a pointless plastic item (aside from the stated necessary uses above) for a pointless paper item that increases existing pressures of deforestation, the Government should implement a charge on non-plastic single use alternatives<sup>37</sup>.

As a priority, to avoid any environmental impacts of alternatives, we encourage the removal of unnecessary SUPs without substitution. Where this is not possible, reusable alternatives should be utilised. Like-for-like substitution with alternative materials should be the last resort. There is also a role for better labelling to discourage incorrect disposal and eco-design to minimise the environmental impact of items.

Additionally see our answer to Q20.

### **23. Is there anything else you would like to tell us relating to the proposed ban on the distribution and/or sale of plastic straws?**

Whilst we welcome the Government's plans to ban plastic drinks straws, we would expect as a minimum to see a wider SUPs ban and regulatory tool proposed to address the broader marine plastics issue in line with measures proposed elsewhere. Notably with regards to the proposed *Directive of the European Parliament and of the Council on the reduction of the impact of certain plastic products in the environment*.

We would like to see measures included in the SUPs ban that facilitate a transition to a more circular economy based on the waste hierarchy principles, emphasising the need to prevent waste in the first instance, followed by redesign, reuse and subsequently, provisions for recapture, reuse and recycling.

It is not clear from this consultation if or how the proposed SUPs ban aligns with the HM Treasury plans for introduction of 30% minimum recycled plastic content (in packaging) – for example, where exemptions are being proposed for SUPs included herein, perhaps stipulations could be made that exempted SUPs be made with minimum 30% recycled plastic.

Where alternatives to broader SUPs not targeted in this consultation are not yet widely used by industry, progressive targets for phase outs and the introduction of more sustainable alternatives should be introduced through the proposed legislation. This will ensure the UK is at the forefront of action on plastics.

We would like to see consideration for supplementary behaviour change policies (e.g., the introduction of charges on single-use hot beverage containers i.e. a latte levy) to ensure proper implementation of ban/benefits in terms of reduction of numbers of SUPs and waste recorded in environment.

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<sup>35</sup> [https://wedocs.unep.org/bitstream/handle/20.500.11822/7468/-Biodegradable Plastics and Marine Litter Misconceptions, concerns and impacts on marine environments-2015BiodegradablePlasticsAndMarineLitter.pdf.pdf?sequence=3](https://wedocs.unep.org/bitstream/handle/20.500.11822/7468/-Biodegradable%20Plastics%20and%20Marine%20Litter%20Misconceptions,%20concerns%20and%20impacts%20on%20marine%20environments-2015BiodegradablePlasticsAndMarineLitter.pdf.pdf?sequence=3)

<sup>36</sup> <http://www.wrap.org.uk/blog/2018/04/unintended-consequences-war-plastic>

<sup>37</sup> <http://www.wrap.org.uk/blog/2018/04/unintended-consequences-war-plastic>

Wildlife and  
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## Part B. Plastic stemmed cotton-buds

### 30. Do you support the proposal to introduce a ban on the distribution and/or sale of plastic stemmed cotton buds in England?

We support the proposed ban.

On average, 27 plastic cotton bud stems have been found on 100m stretches on the UK coastline according to 2017 beach survey results<sup>38</sup> and make up 44% of the visible sewage related debris recorded in the UK<sup>39</sup>. In the UK, projected consumption of cotton bud use for 2018 (based on 2016-2017 consumption data) is 13.2 billion items, meaning our consumption of cotton buds is higher than that for any other EU member state<sup>40</sup>. Marine plastics are known to significantly impact marine life as a result of significant risk of ingestion and entanglement<sup>41</sup>. There is also clear evidence that marine turtles and seabirds specifically, have ingested cotton bud stems<sup>42</sup>.

In response to direct industry lobbying<sup>43</sup> and public support<sup>44</sup>, industry leaders have already shown that commercially-viable alternatives to plastic stems exist<sup>45</sup>. Scotland has already moved to ban the use of plastic cotton bud stems following a public consultation earlier this year in which 99.4% of the 830 respondents voted in favour of banning manufacture and sale of plastic-stemmed cotton buds<sup>46</sup>. Protection for the marine environment (73% of responses), the ready availability of alternatives (7%) and a transition to a more circular economy for resources (7%) were cited as the main reasons for supporting the introduction of the ban.

A recent survey found that all of the ten largest British supermarkets have already committed to ban the sale of plastic-stemmed cotton buds<sup>47</sup>. This sign of corporate action overtaking legislative ambition demonstrates that a ban is both feasible and acceptable to major retailers. It also suggests that the government could be much more ambitious in the scope of its strategy to prevent pollution at the source.

### 31. Do you agree with our proposed date for the ban (October 2019)

Yes.

### 32. Do you agree that the ban should cover all compostable and biodegradable plastic (such as PLA)?

Yes. See our answer to Q17.

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<sup>38</sup> [https://www.mcsuk.org/news/bud\\_stick\\_ban](https://www.mcsuk.org/news/bud_stick_ban)

<sup>39</sup> Data extracted from the results of the 2017 Great British Beach Clean (<https://mcsuk.org/cleanseas/great-british-beach-clean-2017-report>)

<sup>40</sup> WWF, 2018. Plastic consumption and waste management (Commissioned from Eunomia). Available online at: [https://www.wwf.org.uk/sites/default/files/2018-03/WWF\\_Plastics\\_Consumption\\_Report\\_Final.pdf](https://www.wwf.org.uk/sites/default/files/2018-03/WWF_Plastics_Consumption_Report_Final.pdf)

<sup>41</sup> <https://www.fauna-flora.org/conservation-challenges/ocean-plastic-pollution>

<sup>42</sup> <https://theecologist.org/2016/nov/23/switch-stick-why-we-need-stop-buying-plastic-cotton-buds>

<sup>43</sup> <https://www.cottonbudproject.org.uk/news/item/93-fidra-and-johnson-johnson-ltd-joint-statement-on-the-uk-government-s-decision-to-launch-consultation-to-ban-the-sale-and-manufacture-of-plastic-stemmed-cotton-buds.html>

<sup>44</sup> <http://www.switchthestick.org/>

<sup>45</sup> <https://www.cottonbudproject.org.uk/the-good-buddy-list.html>

<sup>46</sup> <https://www2.gov.scot/Resource/0053/00538819.pdf>

<sup>47</sup> Greenpeace and the Environmental Investigation Agency, 2018. Checking out on plastics. Available online: <https://checkingoutonplastics.org/wp-content/uploads/2018/11/Checking-out-on-plastics.pdf>

**33. Can you provide supporting evidence of any expected additional costs and or constraints to industry from this proposed ban?**

It is not anticipated that industry would face additional costs and/or constraints from the proposed ban. On the contrary, introducing legislation is anticipated to level the playing field across the industry as a whole, making positive examples of those who have already committed to removing plastic stems. Similarly, legislation prohibiting the distribution and/or sale of plastic cotton buds in England in line with legislation proposed in the devolved nations (e.g. Scotland) would remove trade barriers within the UK. To date, the majority of UK retailers have already replaced plastic cotton bud stems with more environmentally friendly alternatives such as FSC Certified paper<sup>48</sup> which implies that the benefits of switching to more sustainable materials outweighs any negatives associated with cost. Additionally, the Scottish Government Plastic Cotton Bud consultation response report highlights that Marine Scotland received seven responses to this same question from industry representatives, including Boots and Waitrose. In each case, the respondents confirmed that there were no anticipated additional costs to industry as a result of the proposed ban<sup>49</sup>.

**34. Are there any risks that alternatives to plastic stemmed cotton buds will themselves have significant environmental impacts?**

Yes. See our answer to Q22.

Improved labelling is particularly important for cotton buds, due to their high propensity to be incorrectly disposed of, often down the toilet. Plastic cotton bud stems are consistently observed to constitute approximately 5-10% of marine debris surveyed in European seas and feature in the ten most common items found in Marine Conservation Society beach surveys in Scotland<sup>50</sup>. They are in our seas because people are continuing to flush them down toilets. When entering sewage systems the plastic stems do not settle with organics, their buoyancy allows them to flow through plant equipment and their narrow diameter means they are not caught by all screens. Therefore, whilst paper stemmed cotton buds would be expected to degrade under quicker timescales than plastic stemmed cotton buds, clear labelling is still required to help prevent inappropriate disposal.

**37. Our proposals for enforcement are that the ban will be enforced through civil sanctions set out in Part 3 of the Regulatory Enforcement and Sanctions Act 2008. How should compliance with the ban be monitored? Who should enforce the ban? (for example, Local Authorities, Trading Standards or Office for Product Safety and Standards)**

See our answer to Q21.

**38. Is there anything else you would like to tell us relating to the proposed ban on the distribution and/or sale of plastic stemmed cotton buds?**

See our answer to Q23.

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<sup>48</sup> <https://www.cottonbudproject.org.uk/the-good-buddy-list.html>

<sup>49</sup> <https://www2.gov.scot/Resource/0053/00538819.pdf>

<sup>50</sup> <https://www2.gov.scot/Topics/marine/marine-environment/litter/Initiatives>

## Part C. Plastic drink stirrers

### **40. Do you support the proposal to introduce a ban on the distribution and/or sale of plastic drink stirrers in England?**

Yes.

Plastic drink stirrers are one of a number of disposable food and drink related items that make up 20% of the litter found on beaches in the UK, with 138 items of this type of litter found per 100 metres of coastline<sup>51</sup>. These items are used once, usually for a matter of seconds, before being discarded. Projected UK consumption of plastic drink stirrers for 2018 is 44.1 billion items based on consumption figures from 2016/2017. The projected consumption rate of this single-use plastic item for 2030 is approximately 65 billion items, representing a 47% increase on current consumption levels<sup>52</sup>. Additionally, plastic drink stirrers have a recycling rate of less than 10% in the UK<sup>53</sup>, with a projected increase in recycling of this item in 2030 of *up to a maximum of 5%*.

Plastic drinks stirrers have readily available alternatives, including traditional, reusable metal teaspoons that can be used at point of purchase and cleaned as needed.

As with straws and cotton buds, stirrers are items that many leading UK grocery retailers have already taken action on. Asda, Lidl and M&S are also removing plastic cutlery from the shelves; and Waitrose, Morrisons and Tesco are removing them from cafes and/or home offices.<sup>54</sup>

### **41. Do you agree with our proposed date for the ban (October 2019)?**

Yes.

### **42. Do you agree that the ban should cover all compostable and biodegradable plastic (such as PLA)?**

Yes. See our answer to Q17.

### **43. Can you provide supporting evidence of any expected additional costs and or constraints to industry from this proposed ban?**

While we recognise that there may be some short-term costs associated with transitioning to non-plastic alternatives, we do not anticipate any long-term additional costs or constraints to industry from the proposed ban. In many cases, stirrers can already be replaced by reusable items that can be washed and used repeatedly, e.g. spoons.

### **44. Are there any risks that alternatives to plastic drinks stirrers will themselves have significant environmental impacts?**

Yes. See our answer to Q22.

Drinks stirrers can be defined as a pointless plastic and a like for like switch to, for example, wooden ones poses a risk for deforestation. We would like to see charges to reduce the consumption of single use stirrers and promoting the use of reusable alternatives, such as reusable spoons.

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<sup>51</sup> <https://www.mcsuk.org/press/beachwatch-2017-report>

<sup>52</sup> [https://www.wwf.org.uk/sites/default/files/2018-03/WWF\\_Plastics\\_Consumption\\_Report\\_Final.pdf](https://www.wwf.org.uk/sites/default/files/2018-03/WWF_Plastics_Consumption_Report_Final.pdf)

<sup>53</sup> [https://www.wwf.org.uk/sites/default/files/2018-03/WWF\\_Plastics\\_Consumption\\_Report\\_Final.pdf](https://www.wwf.org.uk/sites/default/files/2018-03/WWF_Plastics_Consumption_Report_Final.pdf)

<sup>54</sup> Greenpeace and the Environmental Investigation Agency, 2018. Checking out on plastics. Available online: <https://checkingoutonplastics.org/wp-content/uploads/2018/11/Checking-out-on-plastics.pdf>

**46. Is there anything else you would like to tell us relating to the proposed ban on the distribution and/or sale of plastic drink stirrers?**

See our answer to Q23.