



# Product Regulation and Metrology Bill: Briefing for Lords Committee Stage on Circular Economy Amendments

This briefing is on behalf of nature coalition Wildlife and Countryside Link ([Link](#)) and sets out support for amendments to the Product Regulation and Metrology Bill which would embed circular-economy practices in product regulation. Making products more durable, repairable and recyclable through regulation is essential to reduce resource use, which is responsible for 55% of global greenhouse gas emissions and over 90% of biodiversity loss on land.<sup>1</sup>

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## Why we need circular economy principles applied to product regulation

In a circular economy, the use of resources is minimised, products and materials are kept in use to avoid becoming waste through maintenance, reuse, repair, refurbishment, remanufacture, recycling, composting and other processes. The Environmental Improvement Plan contains a target to reduce residual waste (excluding construction waste) to 437kg per capita by 2028 but by 2022 this figure stood at 558.8kg, only 2.8% down on 2019.<sup>2</sup> Urgent action is needed to increase circularity and reach this target, which is only 3 years away.

The current linear model of extraction and processing of resources into products and the discarding of these products has enormous environmental and social impacts. These include:

- Biodiversity loss resulting from the destruction of habitats, and death of wildlife, due to resource extraction which often takes place in sensitive eco-systems. For example, UK consumption was associated with of 30,000 hectares of deforestation in 2021.<sup>3</sup>
- Extracting and processing resources into products creates a large amount of greenhouse gas emissions, as noted above. Treatment and disposal of waste resources is separately responsible for 5% of all UK greenhouse gas emissions.<sup>4</sup>
- Waste can leak chemicals and microplastics into the environment, which are harmful to human and animal health. For example, the PFAS group of chemicals, found in

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<sup>1</sup> <https://www.unep.org/resources/Global-Resource-Outlook-2024>

<sup>2</sup> <https://www.gov.uk/government/statistics/estimates-of-residual-waste-excluding-major-mineral-wastes-and-municipal-residual-waste-in-england>

<sup>3</sup> <https://www.gov.uk/government/statistics/england-biodiversity-indicators/17-global-impacts-of-uk-consumption>

<sup>4</sup> [https://assets.publishing.service.gov.uk/media/6604460f91a320001a82b0fd/uk-greenhouse-gas-emissions-provisional-figures-statistical-release-2023.pdf?trk=public\\_post\\_comment-text](https://assets.publishing.service.gov.uk/media/6604460f91a320001a82b0fd/uk-greenhouse-gas-emissions-provisional-figures-statistical-release-2023.pdf?trk=public_post_comment-text)



products from frying pans to clothing, never breaks down in the environment and can cause fertility problems and increase the risk of cancer.<sup>5</sup>

- Waste can kill animals through consumption and entanglement. For example, large numbers of marine animals are killed every year through ingestion of, or entanglement in, plastics in the sea.<sup>6</sup>

Overall, in 2021, the average person in the UK used 7.7 tonnes of resources, well beyond the 4.8 tonnes recommended to bring UK resource consumption in line with our fair share of planetary means.<sup>7</sup> By minimising resource consumption, and reusing and recycling more, the UK can also decrease reliance on raw material imports from other countries, contributing to increased resource security.<sup>8</sup>

### **How product regulation can increase circularity and reduce waste**

Product regulation can be used to influence the impact of products on the environment:

1. Regulations can be used to require manufacturers to design products for durability instead of short, throw-away life-cycles. This means fewer products need to be made, reducing resource extraction and the attendant impacts on the environment. An example is the government commitment to ban single-use vapes, which will mean vapes can only be sold if rechargeable and refillable, meaning they stay in use longer.
2. Regulations can be used to ensure products are repairable. This can include making sure spare parts are available for an extended period of time and ensuring manufacturers offer repair services (see box). This keeps products, and the resources in them, in use for longer.
3. Regulations can be used to ensure products are recyclable, to keep resources in the circular economy. Regulations can also require the use of recycled materials in production, to reduce the burden on extraction of virgin raw materials.
4. Regulations can be used to ensure products do not contain environmentally harmful substances, such as PFAS. This reduces the likelihood of pollutants leaking into the environment and makes it easier to recycle products as such chemicals can be hard to remove during recycling, risking the creation of a cocktail of harmful chemicals.

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<sup>5</sup> <https://www.epa.gov/pfas/our-current-understanding-human-health-and-environmental-risks-pfas>

<sup>6</sup> [https://wwfint.awsassets.panda.org/downloads/wwf\\_impacts\\_of\\_plastic\\_pollution\\_on\\_biodiversity.pdf](https://wwfint.awsassets.panda.org/downloads/wwf_impacts_of_plastic_pollution_on_biodiversity.pdf)

<sup>7</sup> [https://www.wwf.org.uk/sites/default/files/2021-06/Thriving\\_within\\_our\\_planetary\\_means\\_full\\_report.pdf](https://www.wwf.org.uk/sites/default/files/2021-06/Thriving_within_our_planetary_means_full_report.pdf)

<sup>8</sup> <https://green-alliance.org.uk/publication/reinventing-the-wheel-a-circular-economy-for-resource-security/>



5. Regulations can require or encourage the use of materials with a lower environmental impact, including lower carbon footprints. For example, use of sustainably harvested timber instead of steel and concrete can reduce carbon emissions from construction.<sup>9</sup>

#### **Box: right to repair in the EU**

Recently passed EU regulations will introduce a right to repair a wide range of products. This means:

- Manufacturers will be required to provide cost-effective repair services and inform consumers about their right to repair
- Manufacturers will be required to provide spare parts and tools for repair
- Consumers will be given standardised and clear information on repair services, including on price and duration of the repair

Similar regulations could be applied in the UK to increase the lifespan of products and reduce the environmental impacts of resource extraction and processing.

#### **Amendments addressing these issues**

Link supports the following Committee stage amendments to the Product Regulation and Metrology Bill tabled by Baroness Bennett of Manor Castle and Lord Fox, which embed circular economy principles in product regulation<sup>10</sup>:

- The amendment to Clause 1, page 1, line 9 in the name of Baroness Bennett
- The amendment to Clause 2, page 2, line 43 in the name of Baroness Bennett
- The amendment after Clause 2 in the name of Baroness Bennett
- The amendment to Clause 2, page 2, line 43 in the name of Lord Fox and the attendant amendments to Clause 10, page 9, line 38 and Clause 10, page 10, line 32

Together these amendments would allow for the introduction of regulations to reduce the impact of products on the environment as set out above. We would be grateful if peers could speak in favour of them at Committee stage.

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<sup>9</sup> <https://www.nature.com/articles/s41467-021-25300-4>

<sup>10</sup> <https://bills.parliament.uk/publications/56821/documents/5330>



Wildlife and Countryside Link (Link) is the largest nature coalition in England, bringing together 86 organisations to use their joint voice for the protection of the natural world and animals.

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More about the work of Link's Circular Economy Group can be found [here](#)

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