

Call for Evidence on commonly littered and problematic plastic items

February 2022

Wildlife and Countryside Link is a coalition of 65 organisations working for the protection of nature. Together we 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.

This response is supported by the following Link members:

- A Rocha UK
- British Canoeing
- British Mountaineering Council
- CPRE, the countryside charity
- Environmental Investigation Agency
- Friends of the Earth England
- Greenpeace UK
- Institute of Fisheries Management
- Keep Britain Tidy
- Marine Conservation Society
- RSPCA
- Surfers Against Sewage
- Whale and Dolphin Conservation
- The Wildlife Trusts
- WWF-UK
- Zoological Society of London

EXECUTIVE SUMMARY

We welcome the proposals in the commonly littered single use plastic items consultation and the concurrent call for evidence. If enacted, these policies will provide greater protections for nature and we applaud the possibility of further Government action which could fundamentally shift our society away from the current model of disposable, single-use consumption.

There is strong public support for acting to tackle the supply of these polluting items. Polling by City to Sea and Friends of the Earth in May 2021 found that 92% of the British public are concerned about plastic pollution¹ and a petition by City to Sea calling for a ban on these single use plastic items has over 100,000 signatures.²

Action on single use items is vital to tackle three major threats to the natural world:

- **Biodiversity loss:** The UN has reported that resource extraction and processing causes 90% of global biodiversity loss and water stress, as well as

¹ <https://friendsoftheearth.uk/sustainable-living/world-refill-day-brits-demand-government-action-plastic>

² (accessed 10.01.22.) 104,236 signatories <https://you.38degrees.org.uk/petitions/the-uk-must-match-the-europe-wide-ban-on-single-use-plastic>

50% of overall carbon emissions.³ Research shows that the UK must reduce its global resource footprint by three quarters by 2030 to meet planetary limits.⁴

- **Greenhouse gas emissions:** 6% of global oil production is devoted to the production of plastics. Should virgin plastic derived from fossil fuels continue to be used at the current rate, it will comprise 17% of global emissions by 2050.
- **Marine and terrestrial litter:** It is estimated that 1.5–4.5% of all global plastics production ends up in the ocean every year.⁵ These items can break down and be ingested by marine life, potentially travelling up the food chain to humans⁷.

However, despite the benefits of this proposed action, there is a risk that the measures will not deliver unless designed more effectively. Taking the threats outlined above, the current proposals could fail to address all three. This is highlighted when considering the proposed ban on plastic plates and cutlery:

- Firstly, on **biodiversity loss**, because paper plates and wooden cutlery are described by the Government as the “expected alternatives” to plastic ones,⁸ greater demand for wood could worsen global deforestation and destruction of the natural world.
- Secondly, on **greenhouse gas emissions**, the accompanying Impact Assessment states that the proposals may lead to modest increases in emissions as “plastic emits less carbon dioxide equivalent (CO₂e) emissions when placed in landfill relative to paper and wood” and “there is also an additional fuel cost to businesses associated with transporting plates, as paper plates weigh more than plastic ones.”
- Thirdly, on **litter**, while a reduction in marine plastics would be an important achievement, the Impact Assessment still notes that “wooden cutlery is estimated to take 2 years to decompose”, meaning that the natural environment will continue to be polluted by up to 5.31 billion pieces⁹ of wooden cutlery a year.

The solution is to move away from the current model of single use consumption, where each year the UK consumes billions of items requiring the extraction, processing, transportation and disposal of resources, generally through landfill or incineration, with all the associated emissions and other environmental impacts; all for a usage of minutes, if not seconds. Indeed, the default position should be a move

³ <https://www.resourcepanel.org/reports/global-resources-outlook>

⁴ <https://www.wwf.org.uk/what-we-do/uk-global-footprint>

⁵ <https://www.science.org/content/article/here-s-how-much-plastic-enters-ocean-each-year>

⁶ In addition, nanoplastics have now been found at both the Earth's poles for the first time

<https://www.sciencedirect.com/science/article/pii/S0013935122000688>

⁷ https://cdn.friendsoftheearth.uk/sites/default/files/downloads/reducing-household-plastics_0.pdf

⁸ P.2 https://consult.defra.gov.uk/environmental-quality/consultation-on-proposals-to-ban-commonly-littered/supporting_documents/Plates%20and%20Cutlery%20Impact%20Assessment.pdf

⁹ 5.31bn figure from Impact Assessment https://consult.defra.gov.uk/environmental-quality/consultation-on-proposals-to-ban-commonly-littered/supporting_documents/Plates%20and%20Cutlery%20Impact%20Assessment.pdf

away from all single use products, with exceptions justified only on the compelling necessity of their use. This 'prevention at source' approach should guide all policy making in this area, as set out in the Government's Waste Prevention Programme for England.¹⁰

Therefore, while we support proposals to ban single use plastic plates, including plastic bowls and trays, plastic cutlery, plastic balloon sticks and expanded polystyrene (EPS) food and beverage containers, we would like to emphasise that without additional policy support for reuse and refill, these proposals will not live up to their full potential to cut the environmental impacts of resource use.

Furthermore, momentum is building towards the adoption of a negotiations mandate for a global treaty to tackle plastic pollution at UNEA 5.2. More than 2 million people around the world have signed a WWF petition,¹¹ while over 100 global companies,¹² more than 900 civil society organisations,¹³ over 170 leading scientists,¹⁴ and 156 countries, making up more than ¾ of UN member states,¹⁵ have also backed calls for a treaty.¹⁶ Plastic pollution is a transboundary issue which requires a joined-up, global response. The UK Government's support is vital to push for the most ambitious treaty possible, one that is legally binding and covers the full lifecycle of plastics.

We hope that the consultation process can deliver proposals which avoid problematic loopholes. For example, when banning these single use items, it's important to ensure that they aren't rebranded as reusable (as has occurred with plastic carrier bags where 'bags for life' are being increasingly used in a single use manner). There must be a legitimate understanding of how reusables are actually consumed, assessing whether a product is really single use.

We call on the Government to ensure that the proposed bans can be delivered as soon as possible. Businesses will find 2023 is plenty of time for dealing with current stock and planning for the stocking of alternatives in the future (or ideally moving to greater use of reusable and refillable systems). Noting delays across other waste policy areas, such as the proposed Deposit Return Scheme (DRS) in England, we urge the Government to get this policy in place by April 2023 at the latest. These same bans were passed in Scotland in November 2021, coming into force this June. If Scotland can deliver this policy as soon as this summer, England should not delay further than April 2023.

Turning to other proposals in the Call for Evidence:

¹⁰ https://consult.defra.gov.uk/waste-and-recycling/waste-prevention-programme-for-england-2021/supporting_documents/Waste%20Prevention%20Programme%20for%20England%20%20consultation%20document.pdf

¹¹ https://wwf.panda.org/act/take_action/plastics_campaign_page/

¹² <https://www.plasticpollutiontreaty.org/>

¹³ https://wwf.panda.org/wwf_news/press_releases/?4655466/Over-700-Groups-Call-for-an-International-Plastics-Treaty

¹⁴ <https://www.plasticstreaty.org/scientists-declaration/>

¹⁵ <https://plasticnavigator.wwf.de/#/en/stories/?st=0&ch=0&layers=surface-concentration>

¹⁶ UN Treaty on Plastic Pollution ([unplasticstreaty.org](https://www.unplasticstreaty.org))

Wet wipes

We would support a ban on wet wipes containing plastic. Tackling plastics in wet wipes is a step in the right direction, particularly as it addresses the problem of microplastic pollution. Action should go further to significantly reduce the number of wet wipes entering the sewage system. Even with the Fine to Flush standard, there is still the potential for materials to break apart and pass the standard but not effectively break down completely. Furthermore, the standard assesses the physical properties of the wipe but does not assess the chemical additives used in the wipe which may still end up in the environment via overflows or sewage sludge. Government action should instead focus on promoting the disposal of wet wipes in bins, regardless of flushability.

Tobacco filters

We strongly support regulatory action to tackle littering of tobacco filters as they are the most ubiquitous items of litter. Keep Britain Tidy's 2019 litter composition survey for Defra identified cigarette stubs as the most common form of litter across the whole of the UK, accounting for 66% of the total number of litter items collected. The global picture is no different, with an estimated 4.5 trillion filters discarded annually.¹⁷

In addition, there is a growing litter problem relating to other smoking and vaping-related items - cartons, single-use vapes and vape juice pods etc. We would call for the Government to get on the front foot on taking measures to tackle this emerging problem area.

Single use plastic sachets

Plastic sachets become litter and are unnecessary in almost every instance. They are also generally not recyclable, undermining circular economy goals. On one estimate, 855bn sachets are used globally each year by food and home care brands, so a ban in England would show strong international leadership on plastic waste. There are ample opportunities to switch to refillable and reusable packaging to allow the distribution of sauces/dressings without the need for single use sachets. Sachets are currently mainly used in takeaways, restaurants, cafes and hotels, all of which should be able to phase these out and deliver sauces from larger containers.

Single use plastic cups

We support action which would place charges on single use plastic cups. This is crucial in ensuring that the full costs of single use consumption are internalised in the cost of cups at the point of purchase, better reflecting the true environmental impact of these products.

¹⁷ [Tiny but deadly: Cigarette butts are the most commonly polluted plastic - Earth Day](#)

Current approaches aren't working, with continued failures to meet targets for recycling of coffee cups; a hardly ambitious target of 8% of cups being recycled was missed, with only 6% meeting this. It is clear that discount incentives offered by a number of coffee outlets have failed to drive change.

Any charges need to incentivise reuse first and foremost, then to drive higher material capture rates through mandatory takeback, and tackle litter. This could potentially be achieved through a deposit return scheme (DRS) takeback. The Government should explore the possibility of incorporating reusable cups into the proposed DRS. This could include hot and cold drink single use cups. The same logic which justifies a DRS for bottles (in that a monetary incentive promotes the return of the item) applies to driving up return rates for other single use cups.

Whatever approach is adopted, because recycling rates are currently so low, action must also be taken to ensure that there are recycling systems in place to deal with expected higher numbers of returned cups.

Additional items

While we welcome that the Government is seeking views on policy for additional items, we are concerned that this fits a pattern of ad hoc action on plastics. There cannot simply be a new item to ban every few years; this provides no systemic action and allows for market changes towards alternative plastic items or other, potentially equally damaging, materials. Moreover, the request for comments in the Call for Evidence is limited to 'single use plastic items', however this should have been widened to also include any single use materials. Action must not simply lead to substitutions and should seek to deliver the more meaningful goal of transitioning our society away from single use consumption.

Reuse and refill

We welcome the inclusion of reuse and refill in the Call for Evidence. Moving towards this approach would bring huge environmental benefits and offers exciting possibilities for UK leadership in sustainable consumption.¹⁸ Consumer research has indicated that 83% of people would welcome greater access to refillable products yet only 16% currently buy refills; clearly more needs to be done to develop these schemes. We believe that Government policy with regards to reuse/refill is currently inadequate. This could be rectified with action to:

- Promote moves towards **standardisation of container design** which can aid reuse and refill. The Government should consider a requirement of standardised packaging formats for items such as bottles, takeaway containers and tubs; allowing for the same design to be reused and refilled by different brands and product lines. Packaging (Essential Requirements) Regulations should also encourage design for reuse and remanufacture.

¹⁸ See <https://www.sciencedirect.com/science/article/pii/S2352550921000956?via%3Dihub>

- Ensure that reuse is **incentivised** through the design of packaging EPR and the proposed DRS. It shouldn't be more expensive for either a business or consumer to do the right thing for the environment.
- Barriers to reuse should be addressed, particularly **regulatory barriers** such as those relating to manual handling in supermarkets which hamper uptake of more reusable schemes.
- Use policy to drive change in **large retailers**. For example, in France policies have been put in place that promote, incentivise and aid the convenience of reusable containers in large retail establishments.¹⁹
- The Government should introduce **targets** to drive the sector towards greater reuse, using powers in the Environment Act to set requirements on reuse. Changes in shopping patterns have helped open opportunities for a shift to reuse, with the move to online shopping bringing opportunities to rethink how our goods are designed and packaged (with less need for unique packaging to appeal to the consumer in-store).

There are important social, environmental and financial benefits to tackling single use items and cutting the amount of waste we create. Burdens on the public finances from the UK's high levels of waste²⁰ include household waste collection costs of around £1 billion a year and litter costs estimated at £200m a year.

Policies must work together so that these proposals are complemented by the proposed DRS, EPR for packaging and Consistent Collections reforms, as well as new powers in the Environment Act on targets and charging. Indeed, all the policy mechanisms included within this consultation and call for evidence must sit within an overarching systematic policy of reduction. So, while we support these measures, we will not judge an outcome of mass substitution to non-plastic alternatives to have been a success. The Government must go further to realise the benefits of rejecting single use consumption and adopting systems which drive the circular economy through reuse and refill.

Wet wipes

1. Would you support a ban on wet wipes containing plastic? You will be asked about possible exemptions in the following questions. ● Yes ● No ● Don't know

We would support a ban on wet wipes containing plastic. Tackling plastics in wet wipes is a step in the right direction, particularly as it addresses the problem of microplastic pollution. The problem of wet wipes is becoming increasingly well-documented, for example river charity Thames21 has found that wet wipes have created mounds in the river Thames, one of which has grown to the size of two

¹⁹ https://eeb.org/wp-content/uploads/2020/05/No-time-to-waste_Europes-new-waste-prevent_web.pdf

²⁰ <https://www.edie.net/library/In-charts--How-big-is-the-UK-s-waste-mountain---and-what-are-we-recycling-/7046>

tennis courts and over a metre tall in the past six years.²¹ In England, the number of wet wipes recorded by the Marine Conservation Society's September Beachwatch survey 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 with sewage related debris contributing to 4% of total litter items found. They are also a major contributor of 'fatbergs' which block sewers, costing a huge amount to clean up.²²

When there is heavy rainfall and sewage overflows into rivers, wet wipes will end up in the natural environment.²³ When caught on debris they slow the water around them, creating turbulence which attracts further wet wipes and other rubbish. And they become heavy as they accumulate, weighing down on the sediments and leaving no room for oxygen with this smothering effect making the riverbed uninhabitable for some species.²⁴

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.

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. The Government should promote the disposal of any single-use wet wipes in bins, regardless of whether they are labelled as flushable or not.
- 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 (eg dead turtle logo), until a ban

²¹ <https://www.thames21.org.uk/2021/11/laser-scans-show-devastating-impact-of-wet-wipes-on-the-thames/>

²² <https://www.itv.com/news/westcountry/2021-04-22/warning-not-to-flush-wet-wipes-as-giant-fatberg-removed-in-plymouth>

²³ <https://www.nhm.ac.uk/discover/news/2019/august/why-you-should-never-flush-wet-wipes-down-the-toilet.html>

²⁴ <https://www.nhm.ac.uk/discover/news/2019/august/why-you-should-never-flush-wet-wipes-down-the-toilet.html>

comes into force for plastic in wet wipes and ‘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 the point of extraction of the wipes from the packet. 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 Government’s ‘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’.

2. 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. ● Yes ● No ● Don’t know ●

Consultation with affected groups will be extremely important. Alternative products are already available on the market and if these are deemed suitable for affected groups and medical applications, then exemptions should not be applied.

3. 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? ● Yes ● No

Noting our response to question 2, consultation with affected groups is crucial. We question how broadly ‘medical purposes’ is defined as there do appear to be some reasonable alternatives which could be made available for many uses. If, following consultation, there are essential uses identified, the additional measures outlined in detail in our response to Question 1 should be applied, e.g. EPR, improved labelling, and Fine to Flush as a mandatory standard. This can reduce the environmental impact.

4. Are you aware of the water industry’s Fine to Flush standard? ● Yes ● No

5. If you answered yes to question 4, do you think the current water industry 'Fine-toFlush' standard is effective in reducing sewer blockages caused by wet wipes? • Yes • **No • Don't know**

A survey conducted by the Marine Conservation Society in November 2020, found that only one out of the ten main UK retailers has 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. 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.

There hasn't been any research/assessment as far as we know on effectiveness of Fine to Flush within the sewerage network and whether it has had an impact on incorrectly flushed items.

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 end up the environment via overflows or sewage sludge. There have been no studies to assess this. The standard could also encourage additional flushing of wet wipes, increasing the amount of materials in the sewerage systems.

6. 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 • No • Don't know**

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

We agree there should be a mandatory standard for products being described as flushable, dispersible etc as these descriptions imply to the consumer to dispose of it down the toilet. Some flushable products may be required on the market for accessibility reasons and we recommend research into accessibility. However, in general the use of single use wet wipes does not align with the circular economy as they are heavy to transport and, when flushed, wipes increase wastewater processes which are carbon intensive. We strongly advocate for a shift to reusables with the necessary support put in place.

The standard must be applicable and appropriate for UK/England sewer systems and wastewater treatment rather than a trade organisation standardisation. For example WaterUK Fine to Flush differs from the international EDANA standard.²⁵ It is necessary for the water industry to determine appropriate standards. They should have a key role in setting and reviewing the effectiveness of the standard as they have a responsibility to reduce stresses on the system.

7. Do you support mandatory labelling on packaging about disposal and the impact of wet wipe products on the environment? **Yes No Don't know**

In terms of consumer understanding, labelling requirements should be changed so that wipes which cannot be flushed are required to be labelled 'Do Not Flush', and only those which meet the required water industry standard can carry the 'Fine to Flush' standard.

Even then, packaging should advise that these are ideally placed in residual waste. Packaging should include warnings saying what will happen if a product is flushed (potentially with photos of the environmental harm on packaging). Mandatory labelling forces companies and consumers to consider these issues.

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.²⁶

8. Would you support an extended producer responsibility scheme for wipes containing plastic? If so, how might this operate? • **Yes • No • Don't know**

Yes. Extended Producer Responsibility (EPR) including clean up costs, should be applied to all other single use wet wipes, and other single use sanitary products. We note recent findings that blockages cost the water industry around £100m a year with wet wipes a significant contributor.²⁷

9. 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

²⁵EDANA has helped promote the "Do Not Flush" symbol, see <https://www.edana.org/how-we-take-action/product-stewardship/flushability>

²⁶https://www.wcl.org.uk/docs/assets/uploads/Misleading_Environmental_Claims_Link_evidence_14.12.2020.pdf

²⁷ <https://www.theguardian.com/environment/2017/dec/12/baby-wipes-93-percent-matter-causing-uk-sewer-blockages>

alternatives, their environmental impact and any issues that could be caused by increased use of them.

While there may be limited cases where single use wipes are necessary, the focus should be to help the majority to switch to reusable wipes through for instance laundry collection schemes (as part of nappy collection service), free starter packs, and bringing the costs of reusables in line with single use products.

Tobacco filters

10. Do you support the government taking regulatory action to tackle littering of tobacco filters? a. Yes b. No c. Don't know

We strongly support regulatory action to tackle littering of tobacco filters as they are one of the most ubiquitous items of litter in existence. Keep Britain Tidy's 2019 litter composition survey for Defra identified cigarette stubs as the most common form of litter across the whole of the UK, accounting for 66% of the total number of litter items collected. The global picture is no different, with an estimated 4.5 trillion filters discarded annually.²⁸

Cigarette filters, both smoked and unsmoked, are highly toxic to plant and animal life when littered. Please refer to our response to question 14 for evidence on the environmental impact.

In addition to the profound ecological impacts, tobacco litter is a heavy financial burden for both the taxpayer and Government. Please refer to our response to question 13 for evidence on the financial cost.

11. If the government takes forward an extended producer responsibility (EPR) scheme to tackle cigarette littering, which of the following costs related to managing 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
- none
- Other, please specify

Other: cost of enforcement of the littering rules.

²⁸ 'No more butts' (2019) British Medical Journal, May C I van Schalkwyk, Thomas E Novotny, Martin McKee, <https://doi.org/10.1136/bmj.l5890>

All EPR schemes must adopt producer responsibility in its widest sense, covering the full costs of environmental harm. The packaging EPR reforms under development should cover litter costs and promote behaviour change, setting the principles which should also cover any future EPR for cigarette litter.

12. Are there other regulatory approaches that government should consider?

Please give reasons and supporting evidence.

13. What are the financial costs of managing waste tobacco filters?

As stated in our response to question 10, tobacco litter is a heavy financial burden for both the taxpayer and Government. The costs of clean-up for local authorities in the UK is estimated at around £40m per annum²⁹. The City of London alone estimates that six million cigarette butts are dropped on the City's streets every year and it spends about £4 million cleaning them up.³⁰

14. What are the environmental impacts of waste cellulose acetate tobacco filters, including those associated with inappropriate disposal?

Cigarette filters are made of a plastic called cellulose acetate. These plastic filters, even when unsmoked, can cause detrimental effects, having been shown to be toxic to marine and freshwater fish, amphibians, freshwater microalgae, as well as being shown to decrease germination and growth of plants.

When smoked, filters are tossed into the environment, dumping not only that plastic, but also the nicotine, heavy metals and many other chemicals they've absorbed into the surrounding environment, including green spaces and waterways. These chemicals include polycyclic aromatic hydrocarbons (PAHs), metals, phthalates, nicotine, and volatile organic compounds, which can be released as leachate in water.³¹

Filters can take up to 14 years to degrade and even when they do break down it is into microplastics that are an increasing hazard in marine environments.³² Commonly mistaken as food, the plastic and toxic chemicals that filters contain can be lethal to

²⁹ <https://www.gov.uk/government/news/government-explores-next-steps-to-clean-up-tobacco-litter-in-england>

³⁰ <https://www.cityoflondon.gov.uk/services/streets/clean-streets/smoking-related-litter>

³¹ Dannielle Green 2021 <https://www.sciencedirect.com/science/article/abs/pii/S0169534721002755>

³² François-Xavier Joly, Mathieu Coulis, Comparison of cellulose vs. plastic cigarette filter decomposition under distinct disposal environments, Waste Management, Volume 72, 2018, Pages 349-353, ISSN 0956-053X, <https://www.sciencedirect.com/science/article/abs/pii/S0956053X17308474>

nearby wildlife.³³ Recent studies have also found that discarded butts significantly damage surrounding plant growth.³⁴

A recent UK study 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.³⁵ This is 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).

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

The decomposition rates and ecotoxicological impacts of biodegradable cigarette butts remain largely unknown, however the current evidence suggests that biodegradable filters have no significant environmental benefit. Green et al 2020, which found that cigarette butt leachate was acutely toxic to freshwater invertebrates, also demonstrated that biodegradable butts had the same toxic impact as conventional butts in a closed body of water.³⁶ Further, current estimates suggest that biodegradable butts do not actually decompose at a substantially faster rate than conventional butts. Biodegradable butts are estimated to take 2.3–13 years to disappear in compost and at the soil surface, whilst smoked conventional cellulose acetate butts are estimated to take 7.5–14 years.³⁷

Another issue posed by biodegradable butts is the increased likelihood that they will be littered due to their perceived biodegradability, therefore they pose a similar threat to the environment as conventional butts.

16.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?

Vape pods are unlikely to be recycled. There are opportunities for take-back of the wider amount of waste.

³³ Slaughter, E., Gersberg, R. M., Watanabe, K., Rudolph, J., Stransky, C., & Novotny, T. E. (2011). Toxicity of cigarette butts, and their chemical components, to marine and freshwater fish. *Tobacco control*, 20 Suppl 1(Suppl_1), i25–i29. <https://doi.org/10.1136/tc.2010.040170>

³⁴ 'Cigarette butts have adverse effects on initial growth' (2019) *Ecotoxicology and Environmental Safety*, Vol 182, DrDanielle Green et al. <https://doi.org/10.1016/j.ecoenv.2019.109418>

³⁵ Dannielle S.Green, Andrew D.W.Tongue,, BasBoots, The Ecological Impacts of Discarded Cigarette Butts, 2021 <https://www.sciencedirect.com/science/article/abs/pii/S0169534721002755>

³⁶ <https://www.sciencedirect.com/science/article/abs/pii/S0269749120359741?via%3Dihub>

³⁷ Dannielle S.Green, Andrew D.W.Tongue,, BasBoots, The Ecological Impacts of Discarded Cigarette Butts, 2021 <https://www.sciencedirect.com/science/article/abs/pii/S0169534721002755>

Single-use plastic sachets

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

Plastic sachets become litter and use unnecessary resources, driving greenhouse gas emissions and global biodiversity loss. Plastic sachets are also generally not recyclable, undermining circular economy goals. On one estimate, 855bn sachets are used globally each year by food and home care brands.³⁸ A ban in England would show strong international leadership on plastic waste.

18. 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?

There are ample opportunities to switch to refillables. Reusable packaging could be developed to allow the distribution of sauces/dressings without the need for a single-use sachet. Sachets are currently used in takeaways, restaurants, cafes and hotels. All should be able to phase these out and deliver sauces from larger containers.

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

- a. Food and drink: permanent food outlets including restaurants and cafes, and sachets provided with ready meals
- b. Food and drink: mobile outlets including trains, airplanes, food trucks
- c. Beauty industry: providing free samples at the point of sale or single-use quantities provided within a multipack
- **d. Support all of the above**
- e. Do not support any of the above

20. Do you support consulting on introducing a charge on single-use plastic sachets used for: a. Food and drink: stationary outlets including restaurants and cafes b. Food and drink: mobile outlets including trains, airplanes, mobile food vendors c. Beauty industry: providing free samples at the point of sale d. Support all of the above e. Do not support any of the above f. Please give any evidence to support your views

³⁸ <https://www.foodnavigator.com/Article/2020/02/27/Industry-must-act-to-banish-the-curse-of-plastic-sachets-say-campaigners>

Considering the fact that many of these uses are neither essential nor too disruptive to ban, this should be the priority over a charge for these items. The guiding principle should be bans where it is proven that more refillable and reusable alternatives are viable. This would likely be the case in almost all situations with restaurants and cafes where it is easy to dispense sauces etc without sachets. Regarding the beauty industry, bans should be considered with charges in exceptional cases where this is not possible/practicable.

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

There is insufficient clarity in the consultation document as to the technical definition of a sachet. Pouches will be covered by packaging EPR, but it is unclear where the cut off point will be for sachet/pouch.

Paper-laminated sachets should be in scope. Indeed, any kind of single use serving sachet should be included.

22. 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?

There may be rare circumstances in which medical/accessibility issues require plastic sachets.

Single-use cups

23. Would you support the government consulting on a proposal to introduce a charge for single-use cups? • Yes • No • Don't know

We support reform to this system as there is a critical need to ensure that the true costs of single use consumption are internalised in the cost of cups at the point of purchase, better reflecting the true environmental impact of these products.

Current approaches aren't working, with continued failures to meet targets for recycling of coffee cups; a hardly ambitious target of 8% of cups being recycled was missed, with only 6% recycled. It is clear that discount incentives offered by a number of coffee outlets have failed to drive reuse. In addition, the Keep Britain Tidy 2019 Litter Composition Report for Defra found that coffee cups are the fourth highest

litter type by volume, making up 7.8% of dropped litter.³⁹ They are also the second greatest waste type in bins, making up 17% of total bin volume.

A charge has been recommended by the Environmental Audit Committee who recommended “that the Government introduces a minimum 25p levy on disposable cups” with the revenue use “to invest in reprocessing facilities and “binrastructure” to ensure that the remaining disposable cups are recycled.”⁴⁰ A charge was also recommended by Scotland’s Expert Panel on Environmental Charging and Other Measures (EPECOM) who found “strong evidence” for a charge of between 20-25p.

The charge must be set at the right rate, possibly higher even than the (minimum) 25p proposed by the EAC and others as it is vital that it is high enough to affect changes in behaviour. The Republic of Ireland, recognising the need to incentivise reuse, has made reusable plastic bags exempt from certain charges, provided the retailer charges at least 70 cents.⁴¹ The Irish charge was designed to be six times higher than the price consumers reported that they were willing to pay. A similar principle could be adopted for cups in England.

Any charges need to incentivise reuse first and foremost, then to drive higher material capture rates through mandatory takeback, and tackle litter potentially through a DRS takeback. The Government should explore the possibility of incorporating reusable cups into the proposed DRS. This could include hot and cold drink single use cups. The same logic which justifies a DRS for bottles (in that a monetary incentive promotes the return of the item) applies to driving up recycling rates for other single use cups.

Whatever approach is adopted, because recycling rates are currently so low, action must be taken to ensure that there are recycling systems in place to deal with higher numbers of returned cups.

So, while we support a charge, it must be part of a wider suite of measures and work alongside the waste reforms (EPR, DRS, Consistency etc), currently being undertaken by Defra.

24. Do you think this charge should be for both hot and cold drinks? • **Yes • No • Don't know**

The charge should not only cover hot and cold drinks but also cover all fibre based and non-fibre based containers which contain liquids.

³⁹<https://www.keepbritaintidy.org/sites/default/files/resources/20200330%20KBT%20Litter%20Composition%20Report%20-%20FINAL.pdf>

⁴⁰ <https://publications.parliament.uk/pa/cm201719/cmselect/cmenvaud/657/657.pdf>

⁴¹ <https://www.gov.ie/en/organisation/department-of-the-environment-climate-and-communications/?referrer=http://www.dcaae.gov.ie/en-ie/environment/topics/waste/litter/plastic-bags/Pages/FAQ%27s.aspx>

25. Do you think this charge should apply to businesses of all sizes? • Yes • No • Don't know

It is important to normalise the behaviour change so there must be a standard across both small and large businesses.

26. 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.

In general no, however there may be extremely limited situations where exemptions are required such as for medical use or in cases where they are needed to ensure accessibility.

Additional items

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

Policy should be targeting all single-use plastic items, with a more systemic approach to tackling this problem. The current ad hoc approach cannot continue and is simply inadequate to the scale of the challenge. With the slow pace of the policy process it also means that markets may have changed or moved to other single use alternatives by the time regulations are put into force. Quite simply, the default position should be that we don't have single use plastics, with the cases where they are permitted having to be justified based on compelling necessity of their use. At present however, there is a systemic acceptance of widespread single use items in almost all areas of our society/economy. This contributes to the high levels of waste in England and the general overconsumption of resources compared to what the planet can sustain.

However, if the Government is continuing with ad hoc further action on certain products, other items which should be considered for action include:

- **Single use nappies:** In England alone we throw away approximately 3.6 billion single use nappies per year, comprising around 8% of residual waste and costing councils £140 million for disposal and collection. They are a major source of plastic pollution globally, with studies suggesting they are the 25th most common item of marine debris on the seafloor, and the 39th on land.⁴²

⁴² Roman, L., Hardesty, D., Leonard, G. H., Pragnell-Raasch, H., Mallos, N., Campbell, C., and Wilcox, C. (2020) A global assessment of the relationship between anthropogenic debris on land and the seafloor. Environmental Pollution, 264. Available at: <https://www.sciencedirect.com/science/article/abs/pii/S0269749120302141>

They have environmental impacts across their entire life cycle and are also a leading cost for local authorities tasked with their disposal. They also cause significant contamination in recycled waste streams⁴³ and are extremely difficult to recycle given their complex composition of multiple materials. This means they are commonly incinerated or sent to landfill, exacerbating carbon emissions and air pollution.⁴⁴

Recent comprehensive studies comparing the entire life cycle of reusable nappies in comparison to single use nappies have found that reusable nappies have far lower environmental impacts. 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.⁴⁵ Switching to reusable nappies also saves families up to €2,000 per child.⁴⁶ A life cycle assessment published in 2021 by the UN Environment Programme's Life Cycle Initiative also found reusable nappies have lower environmental impacts and recommended that there should be greater advocacy for and incentives to adopt reusable nappy systems.⁴⁷

We would question the wording of this question, which solely focuses on single use plastic items. The goal should be to move away from single use items of any material, all of which carry environmental costs. To illustrate this point, Green Alliance considered the greenhouse gas impact of the material used to make a 500ml drinks container, see chart below.⁴⁸ Switching to glass or aluminium significantly increased emissions in this case, demonstrating how the problem is wider than just plastic items.

⁴³ <https://www.keepbritaintidy.org/news/more-million-people-uk-try-recycle-nappies>

⁴⁴ The Heart of Recycling (2020) Recycling Nappies. Available at: <https://recycling.co.uk/recycling-nappies/>

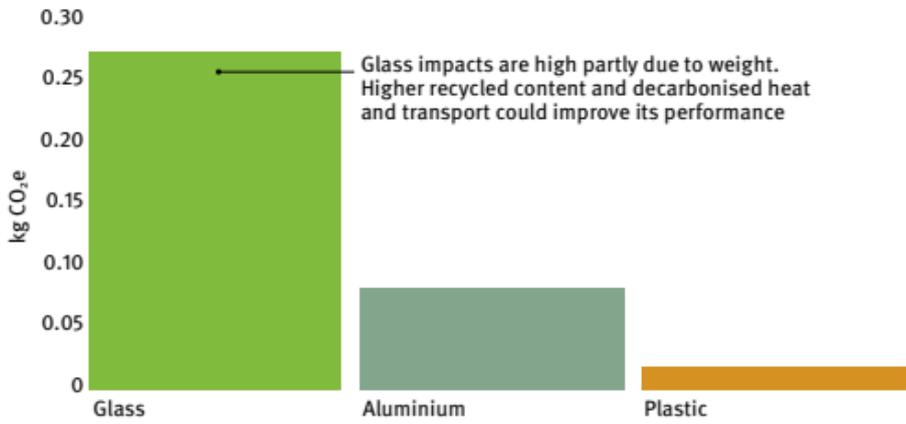
⁴⁵ Cabrera, A., Garcia, R. (2019) The Environmental & economic costs of single-use menstrual products, baby nappies & wet wipes: Investigating the use of these single-use items across Europe. Zero Waste Europe. Available at: https://zerowasteurope.eu/wp-content/uploads/2019/12/bffp_single_use_menstrual_products_baby_nappies_and_wet_wipes.pdf

⁴⁶ Cabrera, A., Garcia, R. (2019) The Environmental & economic costs of single-use menstrual products, baby nappies & wet wipes: Investigating the use of these single-use items across Europe. Zero Waste Europe. Available at: https://zerowasteurope.eu/wp-content/uploads/2019/12/bffp_single_use_menstrual_products_baby_nappies_and_wet_wipes.pdf

⁴⁷ United Nations Environment Programme (2021). Single-use nappies and their alternatives: Recommendations from Life Cycle Assessments. Available at: https://www.lifecycleinitiative.org/wp-content/uploads/2021/03/UNEP-D003-Nappies-Report_lowres.pdf

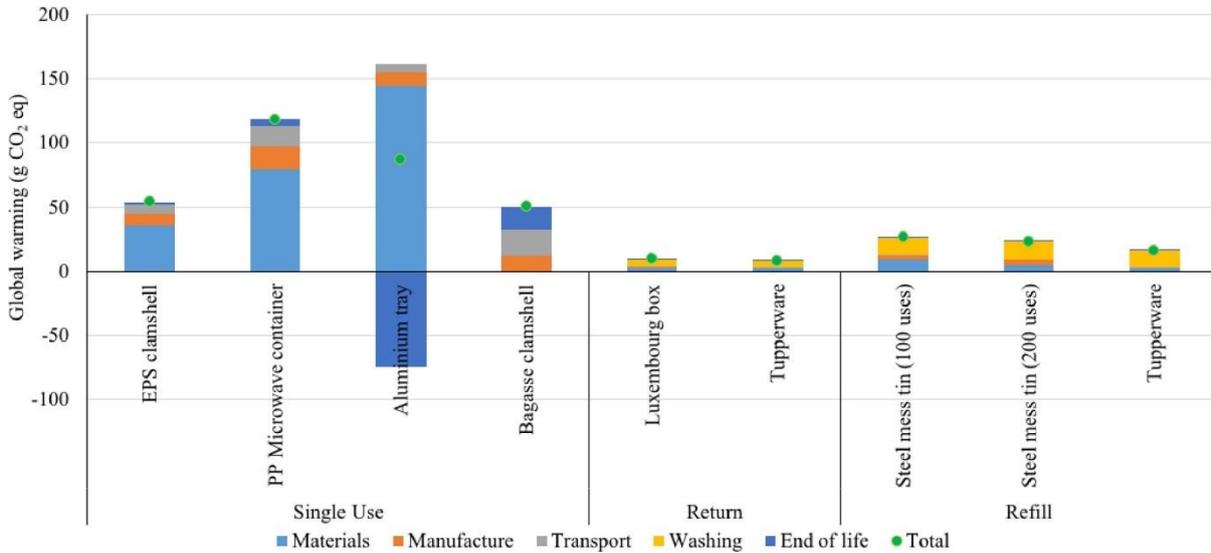
⁴⁸ p.16 https://green-alliance.org.uk/resources/Fixing_the_system.pdf

Representative greenhouse gas impact of material used to make a 500ml drinks container



Source: Green Alliance – [Fixing the System](#)

In addition, the chart below (Greenwood et al, 2021) shows that reducing greenhouse gas emissions from packaging is generally best achieved by moving towards reusable and refillable systems.⁴⁹ Moving from single use consumption will also reduce litter and cut material use.



Global warming potential of one use of each takeaway container (assuming reusable containers have lifetime uses of: 50x for Luxembourg Box, 50x for Tupperware, 100-200x for Steel Mess Tin) (Greenwood et al, 2021⁵⁰)

⁴⁹ Sarah C. Greenwood, Stuart Walker, Harriet M. Baird, Rorie Parsons, Seth Mehl, Thomas L. Webb, Andrew T. Slark, Anthony J. Ryan, Rachael H. Rothman, Many Happy Returns: Combining insights from the environmental and behavioural sciences to understand what is required to make reusable packaging mainstream, Sustainable Production and Consumption, Volume 27, 2021, Pages 1688-1702, ISSN 2352-5509, <https://doi.org/10.1016/j.spc.2021.03.022>

⁵⁰Ibid <https://doi.org/10.1016/j.spc.2021.03.022>

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

For individual products it is hard to define what the broad ‘environmentally friendly’ description means; this could refer to litter, greenhouse gas emissions, material use etc. So, rather than identifying alternative items, the general principle should be to cut our overall resource use, moving away from single use consumption.

Re-use and refill

26. What are the barriers to reuse and how could they be addressed?

27. What are the barriers to refill and how could they be addressed?

28. How can the government incentivise increased reuse and refill?

We welcome the focus on reuse and refill in this call for evidence and hope the Government will ensure that reuse and refill take a more central role in waste and resources policy in the future.

Consumer research has indicated that 83% of people would welcome greater access to refillable products yet only 16% currently buy refills.⁵¹ And polling has suggested that 60% of people in Britain think supermarkets are not doing enough to address plastic pollution and provide customers with reusable and refillable options.⁵² So, it is clear that there is great public demand for a shift towards refill and reuse.

Yet despite this public support, businesses have generally been slow to deliver and Governments have failed to incentivise large scale shifts to reuse and refill. Indeed, research has found that in 2020 just 2% of the products sold by the world's biggest consumer goods firms came in reusable packaging.⁵³

We have outlined barriers for reuse and refill with a number of policy solutions suggested which the Government could adopt to address these. It is important to highlight how any single action on reuse and refill must be part of a wider suite of measures. These include a resource reduction target, more effective tracking and holding to account of businesses putting reusables on the market, and financial support for development of reuse / refill systems. All this must be underpinned by a strong regulatory framework.

-The cost of reusables and refillables:

⁵¹ <https://www.packaginginsights.com/news/refill-and-reuse-unilever-launches-cif-ecorefill-removing-15-million-plastic-spray-bottles-from-shelves.html>

⁵² <https://www.packagingnews.co.uk/news/environment/single-use/poll-finds-support-refillables-frustration-supermarkets-not-addressing-plastic-pollution-16-06-2021>

⁵³ <https://www.edie.net/news/5/Ellen-MacArthur-Foundation--Refillable-packaging-still-accounts-for-just-2--of-the-market/>

- **Problem:** One of the key barriers identified by consumer research is that 40% of people think reuse and refill will be more expensive.⁵⁴ At present, it is frustrating that in certain cases reuse and refill is more costly for the consumer. For example, a high street chemist selling a popular brand of shampoo charges the equivalent of £1.20 per 100ml for the standard bottle, but £1.25 per 100ml for the refill pouch.⁵⁵ There are also upfront costs to some reusable items which are unlikely to be recouped; for example reusable cutlery or reusable produce bags are, though worthwhile for environmental reasons, unlikely to save a consumer money at present. These financial penalties for doing the right thing disincentivise greater reuse and threaten to exclude the least well off from taking more environmentally friendly actions.
- **Solution:** The full cost of packaging waste’s environmental harm should be internalised into the cost of packaging so that reusable and refillable options are cheaper overall compared to single use alternatives.
 - **Charges:** Making single use items more expensive should be achieved through the welcome proposed charges on single use items outlined in the concurrent consultation in addition to the potential charges on items discussed in this current Call for Evidence. The millions of pounds taken in by businesses from charges would ideally be spent on reducing the relative costs of reusables. We urge the Government to use all powers at its disposal to achieve this. We particularly note the new powers in the Environment Act which state that, with regards to single use item charges *“The regulations may (in particular) require the publication or supply of records or information relating to any of the following— (a) the amount received by a seller by way of charges for items specified in the regulations; (b) the seller’s gross or net proceeds of the charge; (c) the uses to which the net proceeds of the charge have been put.”* The Government should ensure that these requirements are always adopted, requiring full public disclosure of the uses of the charges and urging businesses to invest these proceeds into reuse and refill options.
 - **EPR:** It is imperative for reusable packaging to be treated favourably under EPR modulated fees to incentivise reuse and refill systems, otherwise it will be a wasted opportunity to signal the Government’s intent. Compositional analysis of waste should include a requirement to report on reusables found such as bags for life. This could support ongoing analysis of whether favourable modulated fees are delivering on the desired objectives. The UK should also follow the lead of France

⁵⁴ <https://www.packaginginsights.com/news/refill-and-reuse-unilever-launches-cif-ecorefill-removing-15-million-plastic-spray-bottles-from-shelves.html>

⁵⁵ Standard bottle - <https://www.boots.com/aussie-miracle-moist-shampoo-500ml-10136006> and refill pouch - <https://www.boots.com/Aussie-shampoo-refill-miracle-moist-480ml-10291848>

where 5% of EPR funds go to reuse schemes, which will total around 50 million euros a year. These funds are intended to help develop reuse, reduce waste, and to contribute to job creation.⁵⁶ Government action is also needed to communicate the savings from reusables over time, either through central Government communication channels or through guidance to Local Authorities on public messaging, as these are not currently well-understood by consumers.

-Design of packaging:

- **Problem:** Recent research has found that “people were more willing to reuse packaging that was durable, resistant to changes in appearance, and easy to clean” and that “where this is not possible/feasible then consumers’ beliefs about the implications of changes in appearance (e.g., that it is indicative of contamination) need to be challenged.”⁵⁷ These issues are essentially hygiene concerns and were (understandably) particularly acute during the height of the Covid-19 pandemic, though expert advice has now conclusively demonstrated that reusables are safe as long as people employ basic hygiene.⁵⁸ A lack of standardised packaging also hinders reuse as different brands maintain needlessly differentiated packaging, hindering any adoption of widespread reuse of packaging between brands.
- **Solution:** We acknowledge that when it comes to packaging design, there is some complexity which will require a balance between incentivising reusable and refillable packaging vs. market proliferation of heavier reusable items to take advantage of potentially lower modulated fees. To avoid a “bags for life” scenario,⁵⁹ we would ideally have a system whereby the number of uses can be tracked to ensure we are maximising the benefit of reusable packaging. Technologies such as QR codes and blockchain already exist and would be poised to support this.
- **Solution:** The Government should work with businesses to encourage greater uptake of standardised packaging and consider a requirement of standardised packaging formats for items such as bottles, takeaway containers and tubs; allowing for the same design to be reused and refilled by different brands and product lines.

⁵⁶ https://circulareconomy.europa.eu/platform/sites/default/files/anti-waste_law_in_the_daily_lives_of_french_people.pdf

⁵⁷ <https://www.sciencedirect.com/science/article/pii/S2352550921000956?via%3Dihub>

⁵⁸ <https://www.greenpeace.org/international/press-release/43730/reusables-safety-covid-19-health-experts-statement/>

⁵⁹ The use of heavier Bags for Life has skyrocketed over recent years since the single use bag charges were introduced <https://www.theguardian.com/environment/2021/apr/18/supermarket-bags-for-life-must-cost-more-to-cut-plastic-use-urge-campaigners>

-Convenience

- **Problem:** Consumer research suggests that nearly half of people are not aware of the range of reusable or refillable products or don't know where to find refills. There are also concerns about the convenience of mess and spillages from containers.⁶⁰
- **Solution:** France has put in place policies that enable and promote the sale of products without packaging or in containers which can be reused, so that consumers may ask to be served in a container supplied by themselves, so far as the latter is clearly clean and suitable for the nature of the product purchased. A display in retail establishments will inform consumers about the rules for cleaning and the suitability of reusable or recyclable containers.⁶¹ This is a strong signal that consumers can use their own reusable containers and should improve public awareness. The Government should show greater international leadership on this issue and adopt a similar policy.
- **Solution:** A deposit return scheme also opens the logistical opportunities for producers to make the switch to refillable bottles and other reusable containers, as the infrastructure is often the same. For example, The Oregon Beverage Recycling Cooperative (OBRC), the system operator for the deposit return scheme in Oregon in the USA, was in a 'uniquely advantageous position' to introduce a refillable bottle scheme because they already operated much of the necessary infrastructure, including bottle and can return facilities, trucks and space to house washing equipment. In Germany, many bottles are returned for refilling through the DRS.⁶² An all-in DRS would ensure a wide range of take-back locations for reusable bottles (and potentially other reusable containers), making it a convenient option for consumers.
- **Solution:** Although this lies outside Defra's responsibilities, the interaction of waste policy with other policy drivers can promote less 'on the go' disposable consumption. This involves thinking about the fundamental drivers of quick and disposable items, such as a lack of time for proper lunch breaks and working practices which give little opportunity for slower consumption.

-Businesses practices

- **Problem:** Since the middle of the last century, disposable plastics have been profitably produced and marketed by companies who successfully shifted

⁶⁰ <https://www.packaginginsights.com/news/refill-and-reuse-unilever-launches-cif-ecorefill-removing-15-million-plastic-spray-bottles-from-shelves.html>

⁶¹ https://eeb.org/wp-content/uploads/2020/05/No-time-to-waste_Europes-new-waste-prevent_web.pdf

⁶² <https://www.dw.com/en/how-does-germanys-bottle-deposit-scheme-work/a-50923039>

consumption away from reusable containers.⁶³ The model of quick, cheap and readily disposable items is deeply embedded in business models which will be difficult to shift. In addition, marketing practices prioritise unique shapes or formats for packaging and many of the most popular products have packaging which is difficult to recycle.⁶⁴ This has become even more pronounced in recent years with the ever greater proliferation of consumer products.

- **Problem:** How supermarkets work is a barrier, as their systems, store designs and supply chains are based around single use packaging. Major retailers have important choices to make to deliver a transition away from single use consumption such as where to place refill stations and how to ensure they are a success. We commend initiatives such as ASDA's refill zones⁶⁵ and Tesco's partnership with Loop.⁶⁶
- **Solution:** The Government should introduce targets to drive the sector towards greater reuse, using powers in the Environment Act to set requirements on reuse. Changes in shopping patterns support a shift to reuse, with the move to online shopping⁶⁷ bringing opportunities to rethink how our goods are designed and packaged (with less need for unique packaging to appeal to the consumer in-store).
- **Solution:** Regulatory barriers should be addressed such as those relating to manual handling in supermarkets which hamper uptake of more reusable schemes.
- **Solution:** France has recently adopted a policy to obligate retail shops with a sales area greater than 400 m² to ensure that clean or reusable containers, which replace non-reusable packaging, are available to the consumer.⁶⁸ The Government should show greater international leadership on this issue and adopt a similar policy to drive change in the retail sector.

29. How could businesses incentivise customers to support reuse and refill?

The ideal scenario would involve businesses eliminating all packaging where it is not required. For example, online grocery retailers now offer a no bags option which enables the customer to unpack straight from the delivery crate. This is more effective than customer incentives.

⁶³ <https://www.cleanupnews.org/home/history-of-plastics-and-recycling>

⁶⁴ See <https://www.theguardian.com/sustainable-business/2014/jul/18/good-product-bad-package-plastic-recycle-mistakes>, examples of problematic packaging include the crisp bag, yoghurt pots, toothpaste tubes, plastic bottles, online purchases and pizza boxes.

⁶⁵ <https://corporate.asda.com/newsroom/2021/06/16/asda-to-rollout-refill-zones-to-more-stores>

⁶⁶ <https://www.tesco.com/groceries/en-GB/zone/loop>

⁶⁷ <https://www.weforum.org/agenda/2021/07/global-consumer-behaviour-trends-online-shopping/>

⁶⁸ https://eeb.org/wp-content/uploads/2020/05/No-time-to-waste_Europes-new-waste-prevent_web.pdf

Businesses can also support reuse and refill through shop design, better packaging, using their marketing power to promote these initiatives and using their knowledge of consumers to drive this.

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

- Waitrose Unpacked.
- Algramo in South America.
- Smaller scale reuse and refill shops are becoming widespread.
- Water refill points are becoming commonplace again thanks to campaigns such as #OneLess in London⁶⁹. These are generally well-liked and well-received.
- Cosmetics brands; MAC and Chanel offer return of containers.
- There are 4,590 businesses signed up as Surfers Against Sewage Plastic Free Community Business Champions who have all taken steps to introduce refill.⁷⁰

Examples include:

- Hailer: a PR company based in Cornwall and provides a shared working space. They have swapped to using refillable ink cartridges in their printers. Hailer said “ [the] new printer cartridges have zero difference at all, you’re just making a choice about where you purchase from and they’re also cheaper so you can actually save money.”
- FruutBox: a plastic free fruit and veg delivery service who have seen “a big growth in the last year with people coming to Fruutbox specifically because we’re focussing on being plastic free. There’s definitely a huge market out there for plastic free businesses.” They’ve even seen customers switch from bigger veg box companies to them because of their plastic free commitment.
- Origin Coffee Roasters: after carrying out an audit on the business Origin made simple swaps and supplier changes to reduce single use plastics. They found that although the “company has grown hugely over the last few years and we’re roasting significantly more coffee than we were a few years ago, we’ve reduced the amount of waste we’re sending to general waste.” That might not sound like the biggest win but when you account for the fact that recycling costs half as much as general waste collection, they’ve seen a huge reduction in business costs. This coupled with the ‘money off scheme’ for customers bringing in reusable coffee cups resulted in 1000 less cups being used and more coffee sold in 2019, and opened up a new revenue stream as they began selling those reusable cups to customers too.

⁶⁹ <https://www.onelessbottle.org/about-us/>

⁷⁰ <https://plasticfree.org.uk/>

- UnRap is a waste free refill store purchases everything wholesale without plastic and then distributes it to customers in containers they bring from home. They are proving to suppliers that the plastic free market exists. UnRap said “the more we lean on suppliers to reduce single use plastic, the more influence that we’ll collectively have, and it’ll be in the interest of those suppliers to answer those requests.”
- The benefits of going plastic free have also been felt across communities. Surfers Against Sewage Plastic Free Communities Impact Report found that 90% of respondents said that they prefer to use businesses who have acted on becoming plastic-free to those who have not.⁷¹ Respondents also highlighted that there had been an emergence of new business on high streets such as refill shops that have sprung up in response to the plastic free movement. Businesses involved have also noted benefits of becoming plastic free with many highlighting plastic free status had helped them to gain publicity, raise awareness and generate support from the community.

31. 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 • No • Don’t know

Yes, this should be the default.



For questions or further information please contact Matthew Dawson, Resources and Waste Policy Officer, Wildlife and Countryside Link E: matthew@wcl.org.uk

⁷¹ <https://plasticfree.org.uk/wp-content/uploads/sites/2/2022/01/PFC-Impact-Report-2022.pdf>