

ENVIRONMENTAL POLICY FORUM

c/o Society for the Environment

RESPONSE TO THE DEFRA CONSULTATION ON SINGLE USE PLASTIC: BANNING THE DISTRIBUTION AND/OR SALE OF PLASTIC STRAWS, STIRRERS AND PLASTIC-STEMMED COTTON BUDS IN ENGLAND

Introduction

1. The Environmental Policy Forum (EPF) is a network of UK environmental professional bodies promoting environmental sustainability and resilience for the public benefit. The EPF's member bodies have a collective membership of around 70,000 environmental professionals, many of whom are individually chartered in environmental practice, science and engineering disciplines.
2. We welcome the Government's current focus on the issue of plastics waste and as part of this agenda, the recognition that action is needed on single use, disposable plastic items such as those covered by this consultation. We set out our response to this consultation below.

1. A ban on the sale of single use 'disposable' plastic items

- 1.1. The EPF supports a ban on the distribution and/or sale of plastic straws, cotton buds and stirrers. These are part of a group of small, single use plastic items that are unlikely to be separated by the user at the point of disposal, are too small to consolidate and mechanically separate through formal waste/water management systems, and have a higher than average likelihood of leaking into the environment and contributing to terrestrial litter and marine plastics pollution. In the case of cotton buds (and other items such as wet wipes), a further environmental impact is their contribution to sewage system blockages. Alternative materials are available and are already in the marketplace, demonstrating that there is a business case for the substitution of plastic.
- 1.2. However, the ban must be accompanied by further assessment and, where appropriate, guidance and communication related to the following points:
 - 1.2.1. The ban is unlikely to completely eliminate these items, but rather lead to material substitution. While alternative materials are available and are being adopted in the marketplace, these materials are not without their own environmental impacts and further work to assess these – both in the context of formal waste/water management systems and where leakage into the environment occurs – should be undertaken prior to the ban coming into effect.

- 1.2.2. This assessment of alternative materials is particularly important in the case of bioplastics. The term covers a range of fossil and biological-based materials which have been developed with different environmental outcomes in mind, including the substitution of fossil fuels and post-use environmental impact. There are potentially interesting benefits from this group of materials when used in appropriate applications but their environmental performance varies and there continues to be confusion amongst the public and across industry which could lead to poor decision making at both the design and/or disposal stage.
- 1.2.3. Research published earlier this year ([Eliminating avoidable plastic waste by 2042: a use-based approach to decision and policy making](#)) developed a novel use-phase model to categorise plastic products and inform decision and policy making. This approach allows for targeted actions to be defined based on the different environmental impacts of each category and makes the following observations on small, disposable single use plastic items.

For **Very short use phase (<1 day) small format** items, the report notes that: *“The high likelihood of these products entering the marine or terrestrial environments through improper disposal suggests that they should either be prevented or produced from materials that will not cause harm. Several novel biodegradable plastics may fulfil the latter objective in future, however... most biodegradable plastics do not break down fast enough and can still be ingested by wildlife.*

“Alternative non-plastics such as paper and wood, could be used in place of plastics, however the rates of biodegradation in the environment in a ‘manufactured format’ would warrant investigation before placing these products on the market. Whilst alternative materials are being considered, it is also logical to consider whether reusable alternatives are feasible such as metal spoons in place of disposable plastic stirrers and flannels in place of wet-wipes. As discussed... lifecycle assessment sometimes results in counterintuitive conclusions that indicate that reuse is more impactful than single-use disposables.”

- 1.2.4. The ban is unlikely to increase recycling of these items or reduce the potential for leakage into the environment, regardless of material choice, unless appropriate on-pack messaging is required to ensure that they are appropriately disposed of, particularly the ‘not flushable’ message in the case of cotton buds.
- 1.3. The ban will need to include exemptions for specific uses – including medical and scientific – where the continued use of plastic straws and cotton buds is necessary to meet particular criteria. These exemptions must be designed to ensure that those with specific medical/disability needs should not be

disadvantaged or face additional cost burdens.

- 1.4. In terms of the timing of the ban for all the items put forward in the consultation, EPF supports the proposed date of October 2019 subject to satisfactory resolution of the issues highlighted in 1.2.1 – 1.2.3 above.
 - 1.5. Enforcement could most effectively be delivered through a dual role, with the Office for Product Safety & Standards operating as the monitoring and enforcement authority at a national level, including online market compliance, and Trading Standards, with its remit to conducting routine inspection of businesses for compliance with legislation, operating at a regional/local level. However, adequate resourcing will be critical to ensure that both bodies are able to effectively carry out the enforcement role.
2. The EPF stands ready to provide further advice or otherwise assist in the development of a ban on single use plastic items that delivers the best environmental outcomes.

Professor Will Pope
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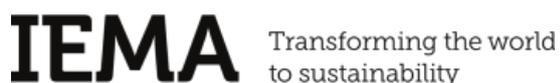
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Notes:

1. The Environmental Policy Forum (EPF) is a network of UK environmental professional bodies promoting environmental sustainability and resilience for the public benefit. The EPF member bodies have a collective membership of circa 70,000 environmental professionals, many of whom are individually chartered in environmental practice, science and engineering disciplines. www.socenv.org.uk/EPF
2. The Chartered Institute of Ecology and Environmental Management (CIEEM) is the leading professional membership body representing and supporting 5,000 ecologists and environmental managers in the UK, Ireland and abroad. Our Vision is of a society which values the natural environment and recognises the contribution of professional ecologists and environmental managers to its conservation. www.cieem.net
3. CIWEM (the Chartered Institution of Water and Environmental Management), is the leading independent Chartered professional body for water and environment professionals, promoting excellence within the sector. www.ciwem.org
4. CIWM (the Chartered Institution of Wastes Management) is the leading professional body for the waste management sector representing around 6,000 individuals in the UK. Established in 1898, CIWM is a non-profit making organisation, dedicated to the promotion of professional competence amongst waste managers. CIWM seeks to raise standards for those working in and with the sector by producing best practice guidance, developing educational and training initiatives, and providing information on key waste-related issues. www.ciwm.co.uk
5. IEMA is the membership body for more than 14,000 environment and sustainability professionals worldwide. We support individuals and organisations in setting and achieving globally recognised standards for sustainable practice, in turn driving the development and uptake of sustainability skills. We add value for our members by providing the knowledge, connections and recognition necessary to lead change within organisations at all levels. We are independent and international. We apply the combined expertise of our members to provide evidence and influence decision-making, working towards our vision of transforming the world to sustainability. www.iema.net

6. The Institution of Environmental Sciences (IES) is a membership organisation that represents professionals from fields as diverse as air quality, land contamination and education - wherever you find environmental work underpinned by science. A visionary organisation leading debate, dissemination and promotion of environmental science and sustainability, the IES promotes an evidence-based approach to decision and policy making. www.the-ies.org
7. The Society for the Environment is comprised of 24 Licenced Bodies, with over 500,000 members between them. It received a Royal Charter in 2004, which empowers it to regulate the Chartered Environmentalist (CEnv) and Registered Environmental Technician (REnvTech) registration in the UK. There are now over 7,000 environmental professionals currently registered who share a common vision of delivering sustainability through environmental professionalism. www.socenv.org.uk