

# Environment, Food and Rural Affairs Committee plastic waste inquiry

## September 2021

*Wildlife and Countryside Link (Link) is the largest environment and wildlife coalition in England, bringing together 60 organisations to use their strong joint voice for the protection of nature. Our members campaign to conserve, enhance and access our landscapes, animals, plants, habitats, rivers and seas. 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 member organisations:*

- A Rocha UK
- British Mountaineering Council
- CPRE, the countryside charity
- Environmental Investigation Agency
- Friends of the Earth England
- Greenpeace UK
- Keep Britain Tidy
- Marine Conservation Society
- Whale and Dolphin Conservation
- WWF-UK

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### **1. What measures should the UK Government take to reduce the production and disposal of single-use plastics in England? Are the measures announced so far, including a ban on certain single-use plastics and a plastic packaging tax, sufficient?**

It is estimated that five million tonnes of plastic are used every year in the UK, nearly half of which is packaging<sup>1</sup>. If we are serious about protecting and restoring our natural world, tackling the twin crises of biodiversity loss and climate change urgently requires society to address our over-consumption of both plastics and resources more generally.<sup>2</sup>

As hosts of the COP26 conference this year, the UK must set a strong example in this often overlooked policy area. In light of the latest Intergovernmental Panel on Climate Change (IPCC) report,<sup>3</sup> it is beyond critical to reduce consumption of fossil fuels and tackle all sources

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<sup>1</sup>[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/765914/resources-waste-strategy-dec-2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/765914/resources-waste-strategy-dec-2018.pdf)

<sup>2</sup> For more information on Link's work on waste prevention see to:  
[https://www.wcl.org.uk/docs/assets/uploads/Link\\_WPP\\_Consultation\\_Response.pdf](https://www.wcl.org.uk/docs/assets/uploads/Link_WPP_Consultation_Response.pdf)

<sup>3</sup> <https://www.bbc.co.uk/news/science-environment-58130705>

of emissions.<sup>4</sup> 6% of global oil production is devoted to the production of plastics<sup>5</sup> and it takes 162g of oil to manufacture a single one litre disposable PET bottle.<sup>6</sup> The carbon intensity of the entire plastic lifecycle (such as emissions from dumping, incinerating, recycling and composting plastic) is greater still, particularly with regards to single-use plastics.<sup>7</sup>

The committee will also be well aware of the impact of plastic waste on the natural environment, human health<sup>8</sup> and the widespread public desire for action. New research has found that 67% of Atlantic puffin nests were found to contain plastic, to take one example, posing a serious threat from ingestion and entanglement.<sup>9</sup> And polling by City to Sea and Friends of the Earth in May 2021 found that 92% of the British public are concerned about plastic pollution.<sup>10</sup>

However, the Government's current approach is piecemeal and demonstrates a lack of courage and foresight. Ministers are failing to promote the large-scale shifts in our consumption models which are necessary to meet the Government's own environmental and climate targets.<sup>11</sup> Indeed, the 2021 Dasgupta Review clearly states that "...if we are to avoid exceeding the limits of what Nature can provide on a sustainable basis while meeting the needs of the human population....consumption and production patterns will need to be fundamentally restructured."<sup>12</sup>

Business models have evolved to be reliant on producing readily disposable products, including plastic, a factor acknowledged in the Government's Waste Prevention Programme for England which notes that "business focus on growing sales" is one of the "challenges hindering change".<sup>13</sup> Tackling these drivers, which include economic and societal factors

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<sup>4</sup> The IPCC have noted that landfills produced 64 million tonnes a year [Tg yr] of methane emissions between 2008 and 2017 <https://www.letsrecycle.com/news/latest-news/ipcc-highlights-landfill-among-climate-impacts/>

<sup>5</sup> 1 Ellen MacArthur Foundation, The New Plastics Economy: Rethinking the future of plastics and catalysing action, 2016, p23 <https://emf.thirdlight.com/link/ftg1sxxb19tm-zgd49o/@/preview/1?o>

<sup>6</sup> <https://www.refill.org.uk/the-problem-with-plastic-3/>

<sup>7</sup> <https://www.sciencedaily.com/releases/2019/04/190415144004.htm>

<sup>8</sup> Examples include: from contact throughout the management and treatment process -

<https://ipen.org/news/toxic-chemicals-plastic-waste-poisoning-people-africa-asia-central-and-eastern-europe-latin> and microplastic endocrine disrupters

<https://www.sciencedirect.com/science/article/pii/S0160412020322297>

<sup>9</sup> <https://www.dailymail.co.uk/sciencetech/article-9868379/Plastic-thousands-seabird-nests-Europe.html>

<sup>10</sup> <https://friendsoftheearth.uk/sustainable-living/world-refill-day-brits-demand-government-action-plastic>

<sup>11</sup> 25 Year Environment Plan – "work towards eliminate avoidable waste by 2050"; "work towards eliminating food waste to landfill by 2030" Industrial Strategy – "double resource productivity by 2050" Climate Change Act – "net zero domestic greenhouse gas emissions by 2050" Resources & Waste Strategy – "increase municipal recycling rate to 65% by 2035" Resources & Waste Strategy – "no more than 10% of municipal waste to landfill by 2035".

See: <https://tinyurl.com/yjc44uut>

<sup>12</sup> "The Economics of Biodiversity: Dasgupta Review - Headline Messages"

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/957629/Dasgupta\\_Review\\_-\\_Headline\\_Messages.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/957629/Dasgupta_Review_-_Headline_Messages.pdf)

<sup>13</sup> [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](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)

(amongst others), will be fundamental. Policies to reduce waste must seek to reform our systems of consumption, scaling up and targeting ambitious roll-outs of reusable packaging systems (particularly for sectors such as retail, e-commerce, takeaways and restaurants).

While these reforms require funding to deliver new infrastructure, e.g for reuse and refill systems, there are huge opportunities to be realised; recent research has found that over 450,000 jobs could be created in reuse and repair businesses, for example.<sup>14</sup> Additionally, research published by Pew Charitable Trusts has found that reduce levers (elimination and reusable systems) are often the most economical to implement while plastic substitutes are typically more expensive<sup>15</sup>.

Policies announced by the Government contain some positive aspects but are too often unambitious and generally fail to address the underlying systemic factors. Turning to recent policies:

### DRS<sup>16</sup>

The Government's manifesto commitment to deliver a deposit return scheme has already been pushed back to "late 2024"<sup>17</sup> and may now be watered down to a so-called 'on the go' design. This would cover just a third of drinks containers placed on the market and may exclude glass containers. Indeed, Minister Rebecca Pow MP reiterated at the Environmental Audit Committee earlier this year that an all-in deposit return system will capture 23bn containers and 'on-the-go' will only capture 7.4bn containers.<sup>18</sup> It is also important to note that having a successful DRS in place, and a public that is used to returning empty items, will mean this infrastructure can be used to support reusable and refillable containers in the future.<sup>19</sup>

### Plastic packaging tax<sup>20</sup>

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<sup>14</sup> <https://www.theguardian.com/environment/2021/aug/04/repairing-and-reusing-household-goods-could-create-thousands-of-green-jobs-across-the-uk>

<sup>15</sup> Figure 17 - [https://www.pewtrusts.org/-/media/assets/2020/07/breakingtheplasticwave\\_report.pdf](https://www.pewtrusts.org/-/media/assets/2020/07/breakingtheplasticwave_report.pdf)

<sup>16</sup> Read the Link group's response to the recent DRS consultation at [https://www.wcl.org.uk/docs/assets/uploads/WCL\\_and\\_WEL\\_DRS\\_consultation\\_response.pdf](https://www.wcl.org.uk/docs/assets/uploads/WCL_and_WEL_DRS_consultation_response.pdf)

<sup>17</sup> [https://consult.defra.gov.uk/environment/consultation-on-introducing-a-drs/supporting\\_documents/DRS%20Consultation%20FINAL%20.pdf](https://consult.defra.gov.uk/environment/consultation-on-introducing-a-drs/supporting_documents/DRS%20Consultation%20FINAL%20.pdf)

<sup>18</sup> <https://committees.parliament.uk/oralevidence/1982/pdf/>

<sup>19</sup> See [https://eia-international.org/wp-content/uploads/EIA\\_UK\\_Supermarket\\_Policy\\_Briefing\\_Report\\_0221\\_v8\\_SPREADS.pdf](https://eia-international.org/wp-content/uploads/EIA_UK_Supermarket_Policy_Briefing_Report_0221_v8_SPREADS.pdf)

<sup>20</sup> Link briefing for Finance Bill 2021

[https://www.wcl.org.uk/docs/assets/uploads/Plastic\\_Packaging\\_Tax\\_Link\\_policy\\_briefing.pdf](https://www.wcl.org.uk/docs/assets/uploads/Plastic_Packaging_Tax_Link_policy_briefing.pdf)

The plastic packaging tax is a positive policy however it remains unambitious in its design and stated goals; over 1 million tonnes of plastic packaging are predicted to remain below 30% recycled content per year.<sup>21</sup>

The Government should set out a roadmap for increasing the £200 per tonne charge and the 30% recycled content threshold over time, include an early and rapid increase in the 30% threshold for recycled content (recognising that this level is rapidly becoming below business as usual), and introduce differentiated thresholds for particular plastics, given that it is simple to include much higher proportions of recycled content for some plastics such as PET. Going forward, Ministers should publish a plan to expand the Plastic Packaging Tax to include other single-use packaging materials to mitigate the negative environmental and social impacts associated with switching away from plastic via material substitution.

An additional concern is recent crude oil price volatility (especially evidenced during the low oil prices throughout the first waves of the Covid-19 pandemic<sup>22</sup>) which subsequently resulted in low virgin plastic prices, making recycled plastic, and associated content targets, more economically difficult to achieve for some. A plastic reduction target, placed at source on virgin plastic production, would avoid this problem.

#### EPR for packaging.<sup>23</sup>

We welcome that the Government recognises that a major overhaul is needed to the current packaging recovery note (PRN) system. Plans to properly embed concepts such as the polluter pays principle and extended producer responsibility in UK packaging legislation are an important step forward. However, the proposed recycling rates for packaging in scope of EPR remain unambitious. For example, only 56% of in-scope plastic packaging is targeted to be recycled by 2030.

#### Single use plastics bans

We welcome action to tackle some of the worst single use plastic products. However, bans on items such as stirrers, cotton buds, and straws are a drop in the ocean in terms of volumes. To deal with the climate emergency, we need to reduce the overall production of new plastics rather than adopting an item by item approach. For example, Scotland is

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<sup>21</sup> The Exchequer expects to receive £235m in the first year that the tax is introduced (2022-23) and £210m in 2025-26. At £200 a tonne, this equates to 1,175,000 tonnes of packaging remaining below the 30% recycled plastic threshold in 2022, and 1,050,000 tonnes still remaining below the threshold by 2025-26.

<sup>22</sup> <https://www.reutersevents.com/downstream/supply-chain-logistics/recycling-industry-challenged-pandemic-fragmentation-price-opacity>, but was present prior to the pandemic also as seen here <https://www.theguardian.com/environment/2019/oct/13/war-on-plastic-waste-faces-setback-as-cost-of-recycled-material-soars>

<sup>23</sup> Read our response to the recent EPR consultation at [https://www.wcl.org.uk/docs/assets/uploads/ELUK\\_EPR\\_Consultation\\_response\\_1.pdf](https://www.wcl.org.uk/docs/assets/uploads/ELUK_EPR_Consultation_response_1.pdf)

currently considering going beyond the EU's Single Use Plastic (SUP) Directive to include policies such as manufacturing restrictions on certain single-use plastic items<sup>24</sup>.

All non-essential items which won't be recycled should be the target of these bans. The current EU SUP Directive addresses the top ten single-use plastic items found littered on European beaches, alongside fishing gear<sup>25</sup>, but the UK has an opportunity to move beyond this approach. Additional items which won't be recycled should also be considered for priority action, aligning with the "prevention" principle<sup>26</sup>. In general, it is also important to widen the focus from beaches to also consider terrestrial and river bank pollution as this can identify other items which are often worse offenders.<sup>27</sup>

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The Government must do much more to prevent waste generation and reduce harm, as dictated by the waste hierarchy. We hope the committee will highlight the urgent need for more ambitious Government action to reduce resource consumption overall. As a priority, the Government must ensure that the Environment Bill includes the power for Ministers to charge for all single use items of all materials, not just those made of plastic.<sup>28</sup> When considering single-use plastic items we encourage the government to develop a strategy to eliminate plastic pollution, support the greater adoption of reuse systems and deliver a reduction in the use of non-essential items<sup>29</sup>. Legally binding targets for increasing resource efficiency and reducing residual waste<sup>30</sup> must be set under the Environment Bill framework in 2022, alongside a clear ambition to reduce overall resource consumption. Given the transboundary nature of plastic pollution, we would also urge the Government to take a leadership role in conversations on negotiating a global plastics treaty in the run up to UNEA 5.2 in February 2022.

## **2. How should alternatives to plastic consumption be identified and supported, without resorting to more environmentally damaging options?**

There is a real risk that alternatives to plastic could have adverse environmental impacts, hence the priority Environment Bill amendment mentioned above. There is a growing trend

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<sup>24</sup> <https://www.gov.scot/publications/introducing-market-restrictions-single-use-plastic-items-scotland-consultation-document/pages/7/>

<sup>25</sup> [https://ec.europa.eu/environment/topics/plastics/single-use-plastics\\_en#ecl-inpage-839](https://ec.europa.eu/environment/topics/plastics/single-use-plastics_en#ecl-inpage-839)

<sup>26</sup> <https://www.clientearth.org/latest/latest-updates/stories/what-are-environmental-principles/>

<sup>27</sup> For example see <https://www.bbc.co.uk/news/science-environment-53479635>

<sup>28</sup> <https://www.wcl.org.uk/docs/Charging%20for%20all%20single%20use%20items%20-%20Link%20Waste%20&%20Resources%20Policy%20briefing.pdf>

<sup>29</sup> Paragraph 6 page 35 - [https://www.wcl.org.uk/docs/assets/uploads/Link\\_WPP\\_Consultation\\_Response.pdf](https://www.wcl.org.uk/docs/assets/uploads/Link_WPP_Consultation_Response.pdf) and [https://eia-international.org/wp-content/uploads/EIA\\_UK\\_Supermarket\\_Policy\\_Briefing\\_Report\\_0221\\_v8\\_SPREADS.pdf](https://eia-international.org/wp-content/uploads/EIA_UK_Supermarket_Policy_Briefing_Report_0221_v8_SPREADS.pdf)

<sup>30</sup> These targets should include but not be limited to targets to reduce plastic pollution

for compostable packaging, for example, which in most instances delivers little to no specific benefit as a replacement for conventional plastic.<sup>31</sup>

Evidence suggests there is also public confusion about commonly used definitions like 'compostable', 'bio-based' and 'biodegradable'<sup>32</sup>. The term 'biodegradable' should not be used in conjunction with packaging, not least as public perceptions about whether an item is biodegradable can influence littering behaviour; i.e. if a bag is marked as biodegradable it is more likely to be littered.<sup>33</sup> And if it is incorrectly collected with conventional recycling, rather than as a separate stream, it will contaminate packaging streams and reduce the quality of secondary materials.<sup>34</sup>

BEIS's Summary of Responses to the call for evidence on standards for bio-based, biodegradable, and compostable plastics acknowledged that repeated and strong concerns were raised regarding the extent to which plastics marketed as biodegradable actually biodegrade in the open environment, and whether the use of plastic labelled as biodegradable could encourage littering if citizens consider them to be in some way environmentally-friendly.<sup>35</sup> Additionally, these alternative plastics are included in the scope of the Plastic Packaging Tax<sup>36</sup>, suggesting the Government acknowledges them as problematic as conventional plastics.

Bio-based packaging also causes public confusion and could lead to incorrect disposal behaviours such as littering or attempts at home composting<sup>37</sup>, when in fact bio-based plastics often have the same properties and therefore degrade in the same manner as oil based plastic polymers. There is also the risk that, if bio-based plastics become established in mainstream manufacturing, the land required for growing bio-based plastic crops will begin to edge out land required for food crops or other competing claims for land, such as afforestation or fibre.<sup>38</sup> Assumptions around bio-based plastic crops leading to a reduction in carbon emissions are not universally valid, as variations can occur because of farming practices, technologies used, energy and raw material differences and therefore require

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<sup>31</sup> For more on Link's work in this area see <https://www.wcl.org.uk/docs/Wildlife%20&%20Countryside%20Link%20response%20to%20standards%20for%20bio-based,%20compostable%20plastics.pdf>

<sup>32</sup> Brits love using sustainability buzz words like 'biomass' and 'carbon neutral' - but have no idea what they mean ([thesun.co.uk](http://thesun.co.uk))

<sup>33</sup> [https://wedocs.unep.org/bitstream/handle/20.500.11822/7468/-Biodegradable Plastics and Marine Litter Misconceptions, concerns and i](https://wedocs.unep.org/bitstream/handle/20.500.11822/7468/-Biodegradable%20Plastics%20and%20Marine%20Litter%20Misconceptions,%20concerns%20and%20i)

<sup>34</sup> <https://www.bpf.co.uk/press/biodegradable-and-oxo-degradable-plastics.aspx>

<sup>35</sup>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/976912/standards-biobased-biodegradable-compostable-plastics.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/976912/standards-biobased-biodegradable-compostable-plastics.pdf)

<sup>36</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/871559/Plastic Packaging Tax - Consultation.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/871559/Plastic%20Packaging%20Tax%20-%20Consultation.pdf)

<sup>37</sup> <https://www.mdpi.com/2071-1050/12/6/2192>

<sup>38</sup> <https://news.climate.columbia.edu/2017/12/13/the-truth-about-bioplastics/>

careful scrutiny<sup>39</sup>. Another point to consider is the sourcing of materials for bio-based plastics - often derived from crops grown in Asia or the USA, the footprint associated with these supply chains is not without environmental and social impacts.<sup>40</sup>

In addition, there is increasing interest in the use of agricultural wastes to produce bio-polymers. We don't believe this is a sustainable option, given the urgent need to manage soil more sustainably and return crop residues back to land. And where there is a viable opportunity to convert agri-waste into packaging materials, this must be evaluated as part of a wider industrial symbiosis strategy for the UK to ensure materials are utilised where they deliver the most benefit, and that may not be for packaging. What's more, seasonal variations could require multiple sources for year-round supply and alternatives like forestry residues have much lower yields than dedicated energy crops and can require energy intensive pre-treatment.<sup>41</sup>

For the above reasons we don't think that large scale adoption of bio-based or compostable solutions offer any particular benefits within a developing circular economy and may actually disrupt its development. We do envisage a limited role for compostable packaging in future, particularly in food contact films where these could be placed in food waste recycling, along with compostable food waste caddy liners.

However, this system would require that anaerobic digestion plants are combined with in-vessel composting (IVC) to ensure that any plastics could be processed effectively and not have to be removed as a contaminant. It is essential that there is a clear strategy when it comes to compostable materials to prevent unintended consequences arising from their use and make sure they really do lead to environmental improvements. Reports such as "Fixing the System" by Green Alliance<sup>42</sup> and "Compostable Packaging Guidance" by WRAP<sup>43</sup> provide sound guidance in this respect.

Another consideration is the potential for future switching of packaging currently made of plastic, to alternatives such as glass and aluminium. For this reason, the Government must ensure that the Deposit Return Scheme in development is an 'all-in' scheme which includes glass. Excluding glass from the system may incentivise producers to switch to this energy-intensive material, which could result in an increase in carbon dioxide (CO<sub>2</sub>) emissions.<sup>44</sup>

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<sup>39</sup> <https://www.sciencedaily.com/releases/2021/02/210205121239.htm> and [https://green-alliance.org.uk/resources/Fixing\\_the\\_system.pdf](https://green-alliance.org.uk/resources/Fixing_the_system.pdf)

<sup>40</sup> <https://www.sciencedaily.com/releases/2021/02/210205121239.htm>

<sup>41</sup> [https://green-alliance.org.uk/resources/Fixing\\_the\\_system.pdf](https://green-alliance.org.uk/resources/Fixing_the_system.pdf)

<sup>42</sup> Ibid

<sup>43</sup> <https://wrap.org.uk/resources/guide/compostable-plastic-packaging-guidance>

<sup>44</sup> <https://www.telegraph.co.uk/news/2019/01/27/glass-bottles-could-worse-environment-plastic-coca-cola-warns/>



Indeed, a focus purely on reducing plastics could have adverse impacts. Switching all current consumption of plastic packaging on a like for like basis to the other materials currently used for packaging could almost triple associated CO<sub>2</sub> emissions, for example, harming the UK's goal to achieve net-zero emissions by 2050.<sup>45</sup> Furthermore, aluminium production uses the most water on a per kilogram basis of any packaging material and paper produced for the UK market uses the most water overall. The Government has a chance to future proof against the potentially detrimental impacts of material switching by delivering the ability to charge for all single use items within the Environment Bill, thereby granting Ministers the ability to introduce charges on single use items as necessary as we gain a better understanding of the harmful impacts of these supply chains.

The best alternatives to plastic consumption are schemes which promote the reuse of items, particularly packaging. The government should consider setting ambitious targets to ensure at least 25% of single use plastic reductions are met by systems of reusable packaging by 2025,<sup>46</sup> recognising that strong action on reuse will cut greenhouse gas emissions, reduce water stress and lower the environmental damage from resource extraction.<sup>47</sup> A recent report by the Pew Trusts showed how elimination and reuse are more economically viable than substitution of materials, see below.<sup>48</sup>

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<sup>45</sup> For a full analysis of the risks of material switching and the need for Government action in the Environment Bill to tackle this, see <https://www.wcl.org.uk/docs/Charging%20for%20all%20single%20use%20items%20-%20Link%20Waste%20&%20Resources%20Policy%20briefing.pdf>

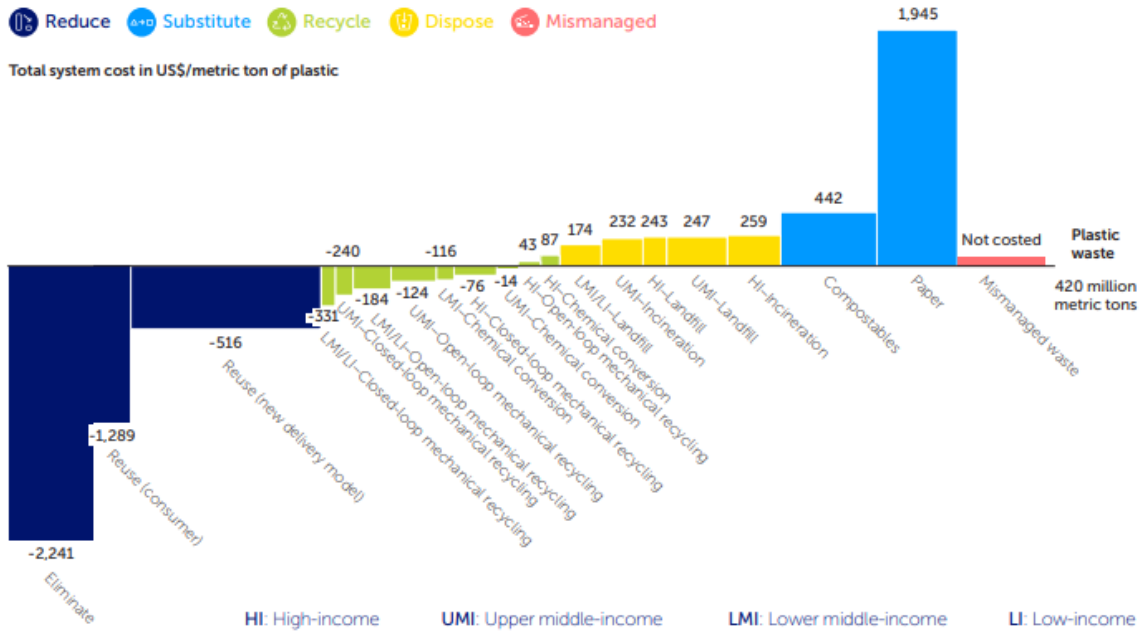
<sup>46</sup> See [https://www.greenpeace.org.uk/wp-content/uploads/2020/08/Greenpeace\\_Unpacked\\_Report.pdf](https://www.greenpeace.org.uk/wp-content/uploads/2020/08/Greenpeace_Unpacked_Report.pdf)

<sup>47</sup> <https://rethinkplasticalliance.eu/wp-content/uploads/2021/07/Realising-Reuse-Final-report-July-2021.pdf>

<sup>48</sup> Figure 17, p41 [https://www.pewtrusts.org/-/media/assets/2020/07/breakingtheplasticwave\\_report.pdf](https://www.pewtrusts.org/-/media/assets/2020/07/breakingtheplasticwave_report.pdf)



**Figure 17: Costs and masses per treatment type in the System Change Scenario, 2040**  
 Reduce levers are often the most economical to implement while plastic substitutes are typically more expensive



The X axis of this chart shows the mass (million metric tons) of plastic waste per treatment type under the System Change Scenario in 2040. The Y axis represents the net economic cost (US\$) of that treatment, including opex and capex, for the entire value chain needed for that treatment type (for example, mechanical recycling costs include the cost of collection and sorting). Negative costs (on the left) represent a savings to the system relative to BAU, while positive costs reflect a net cost to the system for this treatment type. Costs near 0 mean that their implementation is near "cost neutral" to the system. Subsidies, taxes or other "artificial" costs have been excluded; this graphic reflects the techno-economic cost of each activity. The costs shown do not necessarily reflect today's costs, but costs that could be achieved after the system interventions are implemented, including design for recycling and other efficiency measures. Where costs in different archetypes were similar, we combined the figure stacks for simplification and took a weighted average of the cost per archetype. The cost of mismanaged waste, such as plastic in the environment, has not been factored in because we did not price the externalities that mismanaged waste causes.

It is, finally, important to recognise that the current food system is in-part responsible for the reliance on plastic packaging as food is expected to travel further and keep longer. The prioritisation of more localised and seasonal supply chains is another measure that will support waste prevention and support a transition to more options for unpackaged fruit and vegetables.

### 3. Is the UK Government's target of eliminating avoidable plastic waste by 2042 ambitious enough?

We have three main problems with this target.

Firstly, this target is ambiguously worded and leaves open to interpretation the exact definition of 'avoidable plastic'. The definition as provided in the Resources and Waste Strategy 2018, states that "avoidable plastic" is 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". By contrast, The 25 Year Environment Plan says: "Avoidable means what is Technically, Environmentally and Economically Practicable."

While we acknowledge the difficulty with defining this term, it is clear that there are glaring loopholes in the above definitions, where no alternative is judged to have been 'practicable' or a viable 'alternative' (for example would certain plastic food packaging be judged as unavoidable if a producer argued that it was necessary to maintain freshness or food safety?)

Secondly, beyond the definition, having a target date so far in the future is failing to drive policy in the present. Voluntary action by industry is insufficient - we need to see legally binding interim targets and assessments against those targets. To allow for effective scrutiny of the Government's progress against these goals, these should be in absolute values as well as percentages.

Thirdly, the target does little to incentivise reductions in overall plastic production or the overall use of resources. Focusing on recycling is not the solution, especially with regards to plastic where recyclability is finite and the recylate is often of poor quality (although Government should do more to ensure low contamination levels by improving collection and sorting methods).

Indeed, we cannot recycle our way out of the current plastics crisis. Of all the plastic used globally, only 2% is recycled back into like-for-like products, with 8% cascaded recycling (also known as downcycling where plastics go back into lower value plastic products).<sup>49</sup> Of the plastic recycled globally, only 10% has been recycled more than once because contamination and the mixing of polymer types generate secondary plastics of limited or low technical and economic value with mechanical recycling degrading the quality of the material.<sup>50</sup> In addition, chemical recycling has yet to deliver the promised benefits<sup>51</sup>, and facilitates the perpetuation of poor product design resulting in non-recyclable or difficult to recycle plastics, thus highlighting the perils of relying on these new recycling techniques to solve our plastics problem.

Overall, we would reiterate that the solution is to support, and set strong targets on, the reduction of plastics in the first instance and for the Government to deliver the mainstreaming of reuse systems.

#### **4. Will the UK Government be able to achieve its shorter-term ambition of working towards all plastic packaging placed on the market being recyclable, reusable or compostable by 2025?**

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<sup>49</sup> <https://emf.thirdlight.com/link/ftg1sxxb19tm-zgd49o/@/preview/1?o>

<sup>50</sup> <https://advances.sciencemag.org/content/3/7/e1700782>

<sup>51</sup> <https://www.reuters.com/investigates/special-report/environment-plastic-oil-recycling/>,  
<https://www.eunomia.co.uk/reports-tools/final-report-chemical-recycling-state-of-play/>

To provide a current overview of progress towards the 2025 objective, it is worth considering the UK Plastics Pact and its members. Formed in 2018, the Plastics Pact now comprises 90 businesses, who in combination account for two-thirds of consumer plastic packaging in the UK. The above objective is the second of multiple targets they have committed to.

As of December 2020, 64% of the plastic packaging placed on the market by Pact members is recyclable<sup>52</sup>, which, with 5 years remaining to achieve the Government's 100% objective, is somewhat positive. However, progress has stalled over recent years:

- 2018 - In the data year 2018/2019 for Plastic Pact members, using baseline data representing packaging sold by 55 businesses in 2018, 65% of their plastic packaging was recyclable<sup>53</sup>.
- 2019 - In 2019 64% of plastic packaging placed on the market by Plastic Pact members continued to be recyclable.

In their 2019 report, WRAP flagged that to make significant progress to improve this figure, urgent action was needed to make flexible plastic packaging widely recyclable in the UK. If mono-material polyethylene and polypropylene films were recycled, 79% of packaging would be classed as recyclable in 2019.<sup>54</sup>

In a welcome development, a number of retailers (all Plastic Pact members) have recently commenced plastic film collection schemes in store or are currently in the process of trialling them in a bid to address the recyclability of UK plastic film waste. With increased scheme uptake this could also lessen the contamination of plastic film in other plastic waste streams by diverting plastic film from local authority collections and materials recovery facilities (MRFs) (which generally do not currently have the capacity to recycle film).

However, it is critical to highlight that this recycling (and designation of this plastic packaging format as recyclable, thus increasing the Plastic Pact progress towards the 2025 objective) does not take place within the UK, as there isn't sufficient recycling infrastructure for this waste material. It is instead currently exported to Poland, specifically a Eurokey Recycling facility in Zielona Góra, and a number of concerns have been raised about the outcome of this UK waste stream including formal complaints from local residents about its

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<sup>52</sup> <https://wrap.org.uk/sites/default/files/2021-02/The-UK-Plastics-Pact-Roadmap-2020.pdf> this was later corrected to be 63% <https://wrap.org.uk/sites/default/files/2020-12/The-UK-Plastics-Pact-Annual-Report-19-20.pdf>

<sup>53</sup> <https://archive.wrap.org.uk/sites/files/wrap/The-UK-Plastics-Pact-report-18-19.pdf> It is important to note, however, that this percentage was only for recyclability that could occur practically (not just technically). Therefore PP/PE film was not counted as recyclable as it is not recycled at scale. It is unclear whether the target achieved in 2020 includes PP/PE film or not.

<sup>54</sup> <https://wrap.org.uk/sites/default/files/2020-12/The-UK-Plastics-Pact-Annual-Report-19-20.pdf>

poor storage management.<sup>55</sup> Eurokey Recycling has also been flagged by WasteForce in 2018 within a noted illegal export activity of recycled plastic from Chelmsford which was found in bales stockpiled in Hong Kong, ready to go into landfill (the route identified occurring via Poland).<sup>56</sup>

Relatedly, under the current market-based PRN scheme the value of a packaging export recovery note (PERNs) for one tonne of plastics assumes that the material you export is all recycled, so exporters can claim 100% of the PERN value and pass it through the value chain.<sup>57</sup> Therefore, technically, retailers may be assuming (and being credited with) a 100% recycling rate of this exported plastic film despite it being unlikely to reflect the actual recycling rate of this material (especially given this waste stream in particular, being comprised of household packaging waste, will have increased levels of food and other forms of contamination).

Taking this all into account, we encourage the Government to focus on reuse and plastic reduction (prioritising non-essential, non-recyclable, or difficult to recycle plastics) as the two principle measures by which the 2025 objective may be achieved. The elimination of plastic film was something that the Plastic Pact announced they were investigating in 2019, citing that "In many cases, plastic may be the best material choice from an environmental perspective. In these cases, we need to ensure that the plastic can be and is recycled..."<sup>58</sup> The swift implementation of an all-in DRS, EPR and consistent recycling schemes throughout England (and the UK) to ensure their operation prior to 2025 would facilitate companies in achieving this objective. And, in addition to bans on non-essential single use plastics, we urge the government to both develop a strategy and establish timeframes to reduce plastic pollution. This could be set under the Environment Bill framework in 2022. We therefore strongly encourage the government to put this timely policy framework in place so that businesses have the regulatory support required to make the necessary transitions.

## **5. Does the UK Government need to do more to ensure that plastic waste is not exported and then managed unsustainably? If so, what steps should it take?**

<sup>55</sup> <https://www.endsreport.com/article/1718854/does-major-recycling-drive-big-retailers-stand-scrutiny> and <https://zielonagora.naszemiasto.pl/zielona-gora-nowe-osiedle-galeria-i-zielone-skwery-kiedy/ar/c1-8393475> and <https://goleniow.naszemiasto.pl/recykling-w-goleniowskim-parku-przemyslowym-w-zielonej/ar/c1-8124821> and <https://gazetalubuska.pl/mieszkanicy-sulechowa-i-zielonej-gory-obawiaja-sie-nowej-inwestycji-i-recyklingu-odpadow/ar/c3-13300223> and ""Then we press in a special machine and sell it to companies dealing with their recycling - explains Zubair Bajwa." - <https://zielonagora.wyborcza.pl/zielonagora/7,90220,19956859,wagonow-nie-zmontuja-to-co-robia-anglicy-w-hali-zastalu-inwestycje.html?disableRedirects=true> and <https://www.zielonanews.pl/skladowisko-odpadow-w-centrum-co-miasto-na-to-wideo-34378/> (including a video of the facility)

<sup>56</sup> <https://wasteorceproject.eu/wp-content/uploads/2019/02/WasteForce-Waste-Crime-Alert-1.pdf>

<sup>57</sup> <https://www.letsrecycle.com/news/latest-news/levelling-the-playing-field-in-plastics-recycling/>

<sup>58</sup> <https://www.itv.com/news/2019-06-25/eight-plastic-items-marked-for-elimination-from-shelves-by-end-of-2020>

The United Kingdom is the second largest producer of plastic waste per capita in the world<sup>59</sup>, and continues to produce and consume incredibly high levels of plastic. This has been enabled not by the UK investing into adequate domestic treatment infrastructure (which is incredibly lacking)<sup>60</sup> but by the opportunity for UK plastic waste to be exported to other countries - and therefore placing the responsibility of the treatment of UK plastic waste onto others. A measure that even the Government has recently publicly cited being dependent on, stating how Local Authorities need and look to send difficult to recycle and low-grade plastic waste abroad given its cheaper to manage this way<sup>61</sup>.

As a result of these shipments of plastic waste from exporting countries, receiving countries' waste treatment infrastructure is overwhelmed, especially after China prohibited the import of the world's plastic waste in 2018 leaving exporting countries like the UK scrambling for new destinations. The evidence is clear that plastic waste continues to be regularly mismanaged once exported, causing serious harm to the natural environment, human health and the well-being of those in receiving countries<sup>62</sup>, either as a result of legal shipments or illegal trafficking. Recent revelations include plastic waste shipped from the UK to Turkey being illegally dumped and burned,<sup>63</sup> with exports to the country having increased from 12,000 tonnes in 2016 to 209,642 tonnes in 2020, about 30% of the UK's plastic waste exports.<sup>64</sup> For reference, this equates to the UK shipping the equivalent of 108 twenty-foot equivalent unit (TEU) shipping containers of plastic waste to Turkey per day in 2020<sup>65</sup>.

The UK Government, despite promising a consultation on banning of plastic waste exports to non-OECD countries<sup>66</sup> (expected end of next year), is lagging<sup>66</sup> behind on this issue of crucial importance. It is important to note that Turkey is an OECD country, and therefore plastic waste exports to the country would not be impacted by the proposed consultation.

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<sup>59</sup> <https://advances.sciencemag.org/content/6/44/eabd0288>

<sup>60</sup> <https://www.recoup.org/news/8052/uk-plastics-reprocessing-capacity-needs-to-double-by-2022>

<sup>61</sup> "Local authorities have been affected by a number of issues related to plastic waste. This includes a ban by China on accepting certain types of plastic waste. Local authorities have had to find alternative end destinations for plastic waste, which has in turn increased their costs. It is often difficult for local authorities to find recycling solutions for certain types of black plastic and low-grade plastic" -

<https://researchbriefings.files.parliament.uk/documents/CBP-8515/CBP-8515.pdf>

<sup>62</sup> <https://ipen.org/news/toxic-chemicals-plastic-waste-poisoning-people-africa-asia-central-and-eastern-europe-latin> and microplastic endocrine disrupters

<sup>63</sup> <https://www.greenpeace.org/international/press-release/47759/investigation-finds-plastic-from-the-uk-and-germany-illegally-dumped-in-turkey/>

<sup>64</sup> <https://www.theguardian.com/environment/2021/may/24/uk-under-growing-pressure-to-ban-all-exports-of-plastic-waste>

<sup>65</sup> <https://eia-international.org/wp-content/uploads/EIA-Report-The-UKs-Trade-in-Plastic-Waste-SPREADS.pdf>

<sup>66</sup> <https://www.conservatives.com/our-plan>

Subsequently, there are a number of key steps that we strongly encourage the Government to undertake (more detail can be found in our response to the consultation on the UK Plan for Waste Shipments in March of this year<sup>67</sup>).

1. Ban all extra-EU plastic waste exports<sup>68</sup> - Even if the government were to follow through on their non-OECD ban commitment, 79% of UK waste currently goes to countries that are in the OECD (such as Turkey and Malaysia) that would not be affected by the proposed ban<sup>69</sup>. The UK has so far failed to follow the EU's lead in banning exports to non-OECD countries, but still have the opportunity to match and even exceed EU ambition as part of upcoming legislative revisions. Parties to the Basel Convention are required to employ the Proximity Principle, whereby waste should be managed as close as possible to the point of generation. Plastic waste exports act as a means to externalise the true costs of proper waste management and facilitates drivers leading to mismanagement – something that a true circular economy must never do. The UK would only fulfil its obligations by phasing out all plastic waste exports, starting immediately with a ban to non-OECD countries followed by a phase-out of plastic waste exports outside the UK. To the extent any exceptions are provided, those should be limited to exceptional circumstances and subject to robust controls to ensure environmentally sound management. This policy method is not novel. Bans are common policy measures to ensure environmental protection and a UK plastic waste trade ban would not be occurring in isolation, a number of countries who have historically been receiving this plastic waste have implemented import bans themselves as they acknowledge the damage these shipments bring<sup>70</sup>. This measure is gaining support from others, including Policy Connect<sup>71</sup> and Members of Parliament<sup>72</sup>.

In the interim, there are a number of steps that will enable the UK to better manage its plastic waste export problem. Including:

2. Measures relating to waste exports within the proposed EPR reforms must include a requirement to evidence the fate of waste at end destinations - this shift in the burden of proof from the point of export to what's actually happening at the other end is an imperative.

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<sup>67</sup> <https://www.wcl.org.uk/docs/Consultation%20Response%20-%2001.03.2021%20-%20UK%20Plan%20for%20Waste%20Shipments%20.pdf>

<sup>68</sup> For more information please refer to: <https://eia-international.org/report/the-uks-trade-in-plastic-waste/>

<sup>69</sup> <https://www.endsreport.com/article/1707873/mapped-uks-plastic-waste-exports>

<sup>70</sup> <https://rethinkplasticalliance.eu/news/wechoosereuse-waste-trade-and-the-importance-of-moving-from-single-use-plastic-to-reuse/>

<sup>71</sup> With regards to plastic packaging - <https://www.policyconnect.org.uk/research/plastic-packaging-plan-achieving-zero-waste-exports>

<sup>72</sup> <https://eia-international.org/news/mps-call-complete-ban-plastic-waste-exports-uk-developing-countries/>



3. In addition, despite promises of a 'green Brexit', the UK hasn't yet matched the EU's ambition in relation to exports of plastic waste<sup>73</sup>. The EU effectively banned export of non-sorted plastic waste to non-OECD countries. The UK now has a significantly weaker control procedure, which can still allow exports to non-OECD countries of difficult-to-recycle and contaminated plastics, amongst others, and therefore could potentially act as a gateway for unsorted EU plastic waste to now prohibited non-OECD countries.<sup>74</sup>

So, all policies and bodies regarding exports (including waste) must require adequate monitoring and enforcement, which has been severely lacking in recent years. The Environment Agency recently uncovered breaches of export law by the Biffa waste company<sup>75</sup>, however the agency's ability to conduct these crucial investigations is still hindered by a chronic lack of resources and the growing illegal trafficking of plastic waste<sup>76</sup>. Adequate resourcing of the Environment Agency is critical to making the current system fit for purpose before making further headline announcements. Indeed, a NAO 2018 report shows that the EA struggles to monitor let alone control waste export trade activity.<sup>77</sup> According to the regulator's chair Sir James Bevan, the budget for monitoring air and water, enforcing regulations, prosecutions, tackling waste crime, planning and advice, and responding to incidents among other things, has fallen from "£120m to around £50m today"<sup>78</sup>. When illegal activity is identified by the EA, fines appear too low to act as a proper deterrent and cases which are successfully brought against offenders seem to be the exception rather than the rule.

4. Ambitious reforms to the packaging producer responsibility scheme, particularly with regards to incentivisation of exports<sup>79</sup>.

Ensure that waste trade data is publicly accessible, which would also help combat instances of transshipments - a loophole that is often taken advantage of to mask the true destination of plastic waste<sup>80</sup>. This highlights the wider need for traceability and transparency in the sector, which is critical for identifying and preventing leakage and environmentally unsound waste management. The Government should ensure data accuracy, traceability and

<sup>73</sup> <https://www.theguardian.com/environment/2021/jan/12/loophole-will-let-uk-continue-to-ship-plastic-waste-to-poorer-countries>

<sup>74</sup> <https://www.theguardian.com/environment/2021/jan/12/loophole-will-let-uk-continue-to-ship-plastic-waste-to-poorer-countries>

<sup>75</sup> <https://www.gov.uk/government/news/biffa-fined-15-million-for-reckless-export-breach>

<sup>76</sup> <https://op.europa.eu/en/publication-detail/-/publication/ab3534a2-87a0-11eb-ac4c-01aa75ed71a1/language-en>

<sup>77</sup> <https://www.nao.org.uk/wp-content/uploads/2018/07/The-packaging-recycling-obligations.pdf>

<sup>78</sup> <https://www.endsreport.com/article/1705037/ea-heads-blame-budget-cuts-decline-enforcement-monitoring>

<sup>79</sup> Recommendations can be found <https://www.wcl.org.uk/docs/Consultation%20Response%20-%2001.03.2021%20-%20UK%20Plan%20for%20Waste%20Shipments%20.pdf> and <https://eia-international.org/report/checking-out-plastic-policy/>

<sup>80</sup> <https://www.nature.com/articles/s41467-020-20741-9>



transparency through real-time reporting processes accessible to all stakeholders. Standardised electronic systems for in-country movements and limited exceptions to transboundary shipments would also avoid the burden of paper-based documentation.<sup>81</sup>

5. That parallel policy measures impacting plastic waste flows are accounted for, including establishing a clear distinction between mechanical recycling and other recovery treatment operations, a UK-wide threshold of 0.5% for contamination limits within plastic waste and instituting a moratorium on new UK incineration capacity and increased landfilling of plastics<sup>82</sup>.

6. That ultimately, the best solution to the exporting of our plastic problem is to reduce the amount of waste we produce. This is not simply a matter of economics, capacity and recycling but of our global responsibilities to the environmental and human health of places and people around the world.<sup>83</sup>

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<sup>81</sup> See <https://eia-international.org/wp-content/uploads/EIA-Report-The-UKs-Trade-in-Plastic-Waste-SPREADS.pdf>

<sup>82</sup> More information on all these recommendations can be found here:  
<https://www.wcl.org.uk/docs/Consultation%20Response%20-%2001.03.2021%20-%20UK%20Plan%20for%20Waste%20Shipments%20.pdf>

<sup>83</sup> Toxic chemicals in plastic waste exports from wealthy countries are contaminating food in developing/transition countries around the world, according to a report by the International Pollutants Elimination Network (IPEN) <https://ipen.org/news/toxic-chemicals-plastic-waste-poisoning-people-africa-asia-central-and-eastern-europe-latin>