Beyond bans: towards a new model of consumption

The policies needed for widespread adoption of reuse and refill packaging systems

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Wildlife and Countryside LINK

Executive summary

The planet is facing a triple crisis – climate change, biodiversity loss, and pollution and waste. We know that we are living beyond our planetary limits. We are taking more and more resources from our natural world, far faster than they can be replenished. The mountains of waste we generate have polluted every corner of the Earth. The problem has been drastically worsened by our unsustainable production and consumption, exacerbated by our modern throwaway culture.

Decisive action is needed from the government to shift our economy away from these relentless extractive and wasteful behaviours. Thus far, the government's approach to tackling waste and resource use in England has paid insufficient attention to enabling reuse. This risks locking in damaging single-use consumption patterns for years to come.

Certain problematic single-use plastic items have been banned entirely over recent years, with plastic cotton buds, straws, and stirrers removed from sale in the UK. Action is also promised on other 'commonly littered' items, with bans proposed on single-use plastic plates, cutlery, balloon sticks and expanded polystyrene (EPS) food and beverage containers.

However, action has been premised on the expectation that banning certain single-use plastic items will lead to replacement with other, ostensibly less damaging and more 'sustainable', single-use items of different materials; a plastic plate swapped for a paper plate, a plastic fork for a wooden fork, and a polystyrene takeaway box for a bagasse container.

This fails to challenge the underlying problem: a pattern of "take-make-use-dispose", perpetuating our high levels of resource consumption and waste creation.

If bans are not explicitly encouraging adoption of reusable alternatives and these blunt instrument policy tools simply scale-up material substitution, the pressure on land use and sustainable forestry supply chains will perpetuate existing environmental crises, making it harder to meet goals on climate and biodiversity.

Therefore, we are calling for ambitious policy action to ensure that reforms to tackle single-use waste, including plastics, do not lead to perverse environmental outcomes. Reforms must deliver an overall reduction in the amount of resources used each year. We recommend that the government adopts the following 10 steps to a more sustainable economy:

1. Fees under the new Extended Producer Responsibility scheme should be weighted to reward reusable packaging.
2. The Deposit Return Scheme should enable collection of reusable containers.
3. Ban the sale of single-use products in eat-in settings where these can be reasonably replaced with reusable items.
4. Cut taxes on products and packaging sold as part of reuse and refill system activities.

5. Introduce bans and dissuasive monetary charges on the most polluting items to incentivise reusables, requiring proceeds to be used to support affordable reuse schemes.
6. Require public space developments and redevelopments to include water refill points.
7. Encourage comprehensive system changes to drive greater uptake of standardised reusable packaging by businesses.
8. Require large retailers to promote and incentivise reuse in store.
9. Set ambitious targets for greater reusable packaging and for reducing resource consumption, with transparent monitoring and reporting to ensure targets are promoting changes in packaging.
10. Review eco design regulations to embed sustainability at the earliest opportunity before products enter the market.

Reusing items offers the most sustainable alternative to single-use consumption. Every year the UK consumes billions of items which require the extraction, processing, transportation and eventual disposal (generally through landfill or incineration) of resources. This complex system creates huge associated emissions alongside other environmental and social costs; often for a usage of minutes, if not seconds. These costs include local and global harm such as displacement of local communities to clear land, deforestation associated with unsustainable paper sourcing, and the expense of cleaning up ground litter.[1]

People who strive to do the right thing for the environment are also often faced with higher costs: paying for their own reusable bottles, takeaway containers or cutlery, or paying for more expensive zero packaging grocery deliveries. It should not cost consumers more to adopt more sustainable behaviours, with the present system excluding the most disadvantaged in society from adopting the most environmentally friendly options.

We call on the government to move beyond its current fragmented approach to waste and resources, ensuring that policies drive widespread affordable and inclusive reuse and refill systems as soon as possible.

[1] In England, the government has decided to exclude the costs of ground litter from the Extended Producer Responsibility for packaging scheme - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1063589/epr-consultation-government-response.pdf

Introduction

Every year the UK consumes billions of items which require the extraction, processing and transportation of resources, before their eventual disposal — generally through landfill or incineration. This creates huge associated emissions and other environmental impacts, often for a usage of minutes, if not seconds. Our current consumption patterns drive three major global environmental crises:

- **Biodiversity loss:** The UN has reported that resource extraction and processing causes 90% of global biodiversity loss and water stress, as well as 50% of overall carbon emissions.[2] Research shows that the UK must reduce its global resource footprint by three quarters by 2030 to meet planetary limits.[3]
- **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.[4] In the UK, waste sector emissions, including energy-from-waste plants, accounted for 6% of UK greenhouse gas emissions in 2018. The Committee on Climate Change have outlined the need to "accelerate the transition to a circular economy" as a key policy for reducing waste emissions.[5]
- **Marine and terrestrial pollution:** It is estimated that in 2016 alone, 19 - 23 million metric tons, or 11%, of plastic waste generated globally, entered aquatic ecosystems.[6,7] These items can break down and be ingested by marine life, potentially travelling up the food chain to humans.[8] Terrestrial litter has been found to particularly blight the most deprived areas of the country, with an average of 28% of sites in deprived areas falling below an acceptable level for litter, compared to 3% in the least deprived.[9]

The case for action on single-use plastics has been particularly well-established over recent years. Following shocking images of plastic choking wildlife in David Attenborough's Blue Planet II in 2017, public outrage led to numerous government promises on plastic pollution, the outcomes of which are still under development today.

Single-use item bans

Certain problematic items have been banned entirely over recent years, with plastic cotton buds, straws, and stirrers removed from sale in the UK. Action is also promised

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[2] https://www.resourcepanel.org/reports/global-resources-outlook
[3] This overall 'footprint' figure includes reductions needed on ecological, material, biomass, nitrogen, phosphorus, and CO2 footprints https://www.wwf.org.uk/what-we-do/uk-global-footprint
[4] https://www.sciencedaily.com/releases/2019/04/190415144004.htm
[5] https://www.theccc.org.uk/wp-content/uploads/2020/12/Sector-summary-Waste.pdf
[6] https://www.science.org/doi/10.1126/science.aba3656
[7] 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
[8] https://cdn.friendsoftheearth.uk/sites/default/files/downloads/reducing-household-plastics_0.pdf
[9] https://www.circularonline.co.uk/news/survey-shows-link-between-litter-deprivation-and-crime/

on other 'commonly littered' items, with bans proposed on single-use plastic plates, cutlery, balloon sticks and expanded polystyrene (EPS) food and beverage containers.

However, action has been premised on the expectation that banning certain single-use plastic items will lead to replacement with other, ostensibly less damaging and more 'sustainable', single-use items of different materials; a plastic plate swapped for a paper plate, a plastic fork for a wooden fork, and a polystyrene takeaway box for a bagasse container.

In short, the government's goal appears to be substituting single-use consumption of one material to single-use consumption of another, without challenging the underlying logic of the use once, throw away approach.

Single-use item	Annual consumption in UK (billion)
Coffee cups	2.5
Plastic plates	1.1
Plastic cutlery	4.3
Nappies	3.6
Plastic bottles	7.7

High consumption of single-use items is among the root causes of environmental crises[10]

While a move away from single-use plastics is positive, substituting plastic for single-use alternatives like paper, steel, aluminium or glass can be as, if not more, problematic for the environment (depending on the supply chain). These items, at present, can have overall environmental impacts (be that CO2 emissions, the impact of mining, or associated water stresses) which can be greater than the plastic they replace. Green Alliance's *Fixing the System* report has calculated that switching all current consumption of plastic packaging on a like for like basis to the other materials currently used for packaging in the UK could almost triple carbon emissions associated with packaging supply chains; from 1.7 billion tonnes CO2 equivalent to 4.8 billion tonnes CO2 equivalent.[11]

Indeed, a focus on the visible end-of-life blight of plastic pollution on the natural world should not obscure the impacts that occur from our high consumption of all materials.

[10] Plates and cutlery using the central government estimate https://consult.defra.gov.uk/environmental-quality/consultation-on-proposals-to-ban-commonly-littered/supporting_documents/Plates%20and%20Cutlery%20Impact%20Assessment.pdf nappy estimate from Nappy Alliance https://committees.parliament.uk/writtenevidence/38844/html/ coffee cup estimate (although likely higher when including vending) https://publications.parliament.uk/pa/cm201719/cmselect/cmenvaud/657/657.pdf plastic bottle estimate https://www.water.org.uk/news-item/national-refill-day/

[11] Fixing_the_system.pdf (green-alliance.org.uk)

Government policies are not addressing the root causes of the problem

The Environmental Audit Committee (EAC) has highlighted the link between consumption in the industrialised world and biodiversity loss, concluding that "we must bring consumption to a sustainable level".[12] The 2021 Circularity Gap Report, states the world is currently just 8.6% circular, meaning that of the more than 100 billion tonnes of material mass extracted from the planet to meet our consumption demands, 91.4% is lost as part of our continued linear system.[13] This means asking difficult questions of how our consumption patterns can revert to sustainable levels.

Yet, underpinned by the Resources and Waste Strategy,[14] government waste policies currently give little to no focus on reducing resource consumption and incentivising reuse. One example is the government's flagship extended producer responsibility (EPR) for packaging reform which, from 2024,[15] aims to place the costs of disposing packaging waste onto those who manufacture it. Under EPR, fees paid by producers will be designed so they vary depending on the recyclability of a given packaging material and format. While this is partly commendable, fees should also be explicitly designed to drive reduction and reuse.

Another big offender is the single-use coffee cup (often with plastic lids), of which the UK consumes 2.5bn per year. Government measures and voluntary industry initiatives have been focused on driving higher recycling rates but there is currently no plan in place to deliver a reduction in their use.

So, the current direction of travel is for ad hoc bans on selected plastic items, with greater recycling to collect and reprocess materials that remain in circulation. **Reduction and reuse are not explicitly incentivised**.

A sustainable solution

One solution is to systematically ban unnecessary single-use items, no matter what material they are made from, which should ensure that the 'prevention at source' environmental principle is applied, see box below. This principle means seeking to prevent environmental harm at source rather than remedying it once it has occurred.

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[12] https://committees.parliament.uk/committee/62/environmental-audit-committee/news/157836/uk-government-and-businesses-must-take-decisive-steps-to-boost-sustainable-consumption-critical-to-protect-global-nature/

[13] Circularity Gap Report Summary 2021 https://drive.google.com/file/d/1_dqHX5Ztajz_4NYP72gJiJej_yqcHnXW/view

[14] https://www.gov.uk/government/publications/resources-and-waste-strategy-for-england

[15] EPR will begin from 2024, following a delay announced in March 2022, from the original 2023 start date https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1063589/epr-consultation-government-response.pdf

Furthermore, using powers recently delivered through the Environment Act,[16] charges should be placed on single-use items to disincentive consumption, requiring proceeds to be used to support affordable reuse schemes. Investment in infrastructure and systems which help keep materials in use should be actively encouraged.

Environmental principles policy statement supports prevention

Earlier this year, the government published a policy statement which embeds the prevention principle in government policy:

"The prevention principle should promote policy design options that prevent environmental damage either before it has occurred (through policy design), or to contain existing damage. This can have economic benefits as it prevents additional costs and complexities that arise when environmental damage occurs.

"The prevention principle should generally be used in preference over the rectification at source principle or polluter pays principle, as these principles are used in instances when prevention cannot be achieved."

Former Environment Minister Rebecca Pow said: *"Our environmental principles will ensure we put the environment at the heart of the Government's work across Whitehall."*

Reusing items, be that cups, nappies or other items, has the potential to significantly reduce the environmental impact of the most problematic waste streams. In addition to environmental gains, there are important social 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 waste[17] include household waste collection costs of around £1 billion a year and litter costs estimated at £200m a year.[18]

To meet its targets relating to climate, waste, and resources,[19] the government has to do more to transition the UK away from a single-use consumption model. Indeed, the need for action has only grown following the adoption by UN member states at UNEA-5.2 of a resolution to 'End plastic pollution: Towards an international legally binding instrument'.[20] Further, with development of the Environment Act targets still underway, the Government has the opportunity to target a halving of resource use by 2030.[21] Reuse provides the clearest opportunity to deliver these meaningful changes.

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[16] https://resource.co/article/environment-bill-amendments-see-charges-introduced-all-single-use-items

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

[18] https://www.letsrecycle.com/news/defra-consultation-gives-breakdown-of-epr-costs/

[19] 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

[20] https://www.theguardian.com/environment/2022/mar/02/world-leaders-agree-draw-up-historic-treaty-plastic-waste

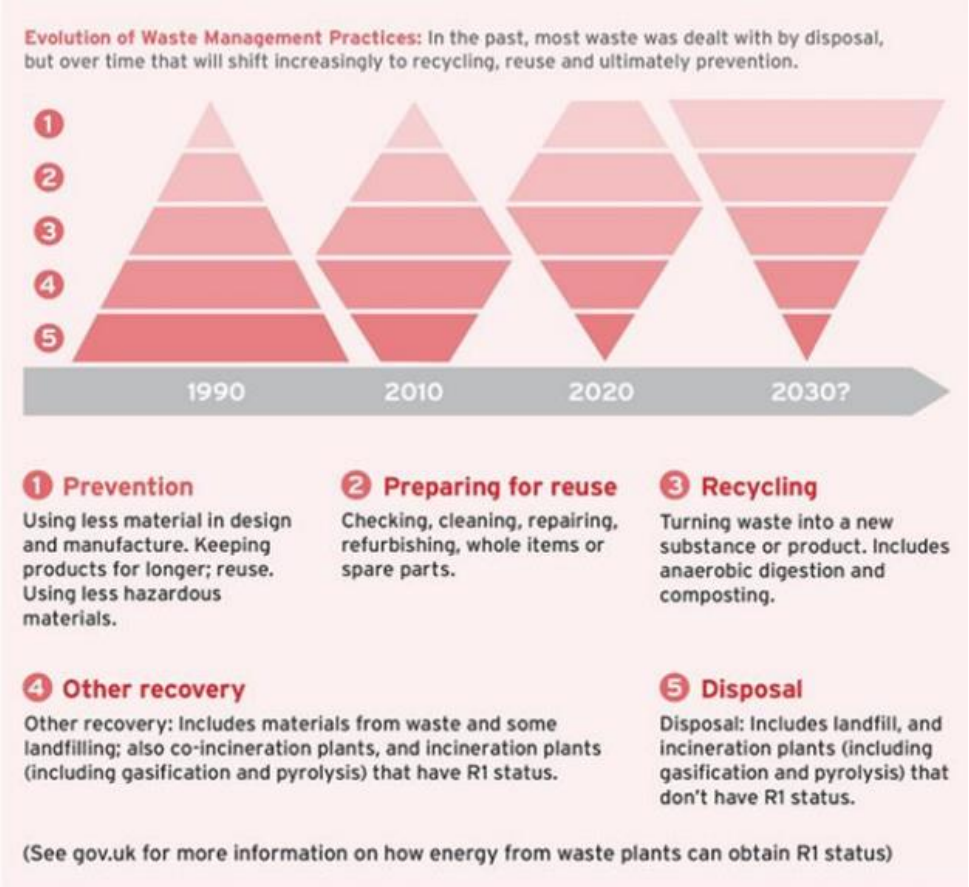
[21] See https://www.wcl.org.uk/docs/Environment_Act_targets_consultation_response.pdf

What is reuse?

At its simplest, reuse means keeping products in circulation for longer, over multiple uses, maximising resource efficiency and mitigating their embedded life cycle impact. It is a key lever for achieving a circular economy for resources.

Government policies have not explicitly incentivised a shift away from single-use packaging and wider adoption of alternatives such as reuse/refill. However, the government's Waste Prevention Programme for England reiterates the importance of the waste hierarchy, see below, with reuse second to prevention as the top priority for waste management, with disposal by landfill or incineration the least preferred outcome.

Evolution of Waste Management Practices



Waste Prevention Programme for England. Consultation version - March 2021[22]

[22] See chart, p.4 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

Scaling up reuse is the right approach across the economy, with policies needed to support a systems change to enable cleaning, repairing, and refurbishing of items. With regards to packaging, reuse can be delivered either through:

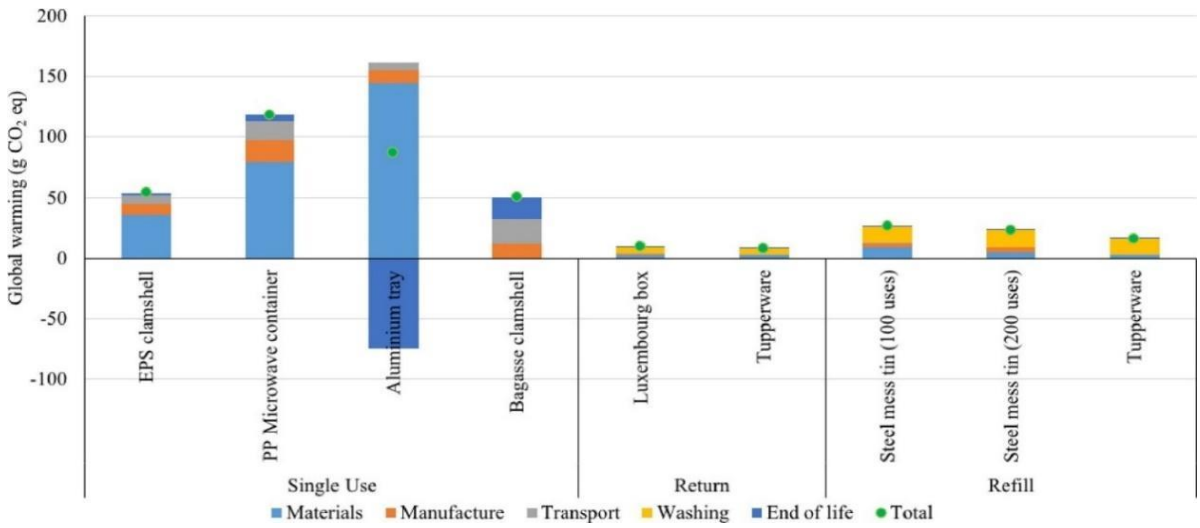
1. **Return:** where a container is owned and cleaned by a business (or group of businesses) with the consumer returning this after use. A deposit may be charged on the container to ensure returns. Examples of this type of packaging include reusable takeaway boxes, such as those being trialled by Just Eat for selected takeaways in London[23] and Burger King's reusable packaging trial in conjunction with Loop.[24] This approach also includes prefilled products where the packaging is returned to a predetermined location once used and undergoes industrial cleaning prior to it being returned for sale.[25]
2. **Refill:** where the container is owned by the consumer after the first purchase and then refilled with products either at home or at a refill station in store. Examples of this type of packaging include containers bought by a consumer for use at a zero-waste store, where a glass jar might be refilled with pasta, nuts etc.

Greater reuse cannot be delivered simply through a rebranding of existing single-use packaging with a 'reuse' message. Packaging producers cannot be allowed to continue with existing damaging practices while arguing that a PET plastic water bottle, for example, is reusable. By definition this is repurposing of an item which was not designed specifically for reuse. Clarity and stakeholder alignment around terminology is critical.

[23] https://www.edie.net/news/5/Just-Eat-trials-reusable-takeaway-packaging-in-bid-to-cut-plastics-use/
[24] https://www.burgerking.co.uk/loop-test
[25] See https://www.tescoplc.com/media/759266/tesco-reuse-report.pdf

The benefits of greater reuse

Reusing items means that the material needed to produce them is used many more times before eventual disposal. The University of Sheffield's Many Happy Returns project has calculated life cycle assessments which indicate that reusable containers outperform single-use plastic containers on most measures of environmental impact.[26] Their 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.[27] Moving from single-use consumption will also reduce litter and cut material use,[28] thereby reducing the environmental and social impacts associated with global virgin material supply chains.



***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, 2021)**

In addition, a report by the Pew Trusts examined the benefits of reducing materials and greater reuse. It found that elimination and reuse are more economically viable than substitution of materials for plastic, such as paper or compostables, see below.[29]

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[26] For more examples of the environmental benefit of reusable containers over their full lifecycle, see https://www.sciencedirect.com/science/article/pii/S2352550921000956?via%3Dihub

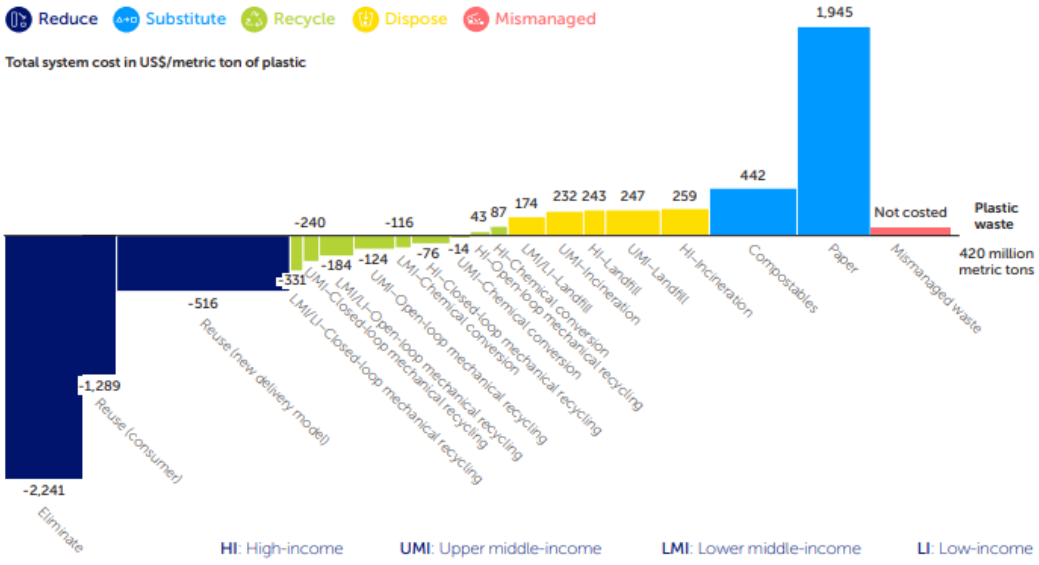
[27] Sarah C. Greenwood, Stuart Walker, Harriet M. Baird, Rorie Parsons, Seth Mehl, Thomas L. Webb, Andrew T. Slark, Anthony J. Ryan, Rachael H. Rothman,
Many Happy Returns: Combining insights from the environmental and behavioural sciences to understand what is required to make reusable packaging mainstream,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

[28] See https://www.wcl.org.uk/docs/assets/uploads/Link_Call_for_Evidence_on_commonly_littered_and_problematic_plastic_item_response.pdf

[29] 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.

Further, Green Alliance's report *"Levelling up through circular economy jobs"*,[30] found positive economic opportunities which could be delivered through a more circular economy, with jobs in sectors such as reuse, repair and remanufacture.[31] These opportunities were spread throughout the country, including the potential for skilled repairers of machinery and electronics in the West Midlands.

Consumer research has indicated that 83% of people would welcome greater access to refillable products yet only 16% currently buy refills.[32] 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.[33] So, it is clear that there is great public demand for a shift towards refill and reuse, but further work is required to mainstream the many solutions being trialled, making them more accessible for all.

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[30] 'Circular economy' being defined as "where products and resources are kept in use for as long as possible" https://green-alliance.org.uk/resources/Levelling_up_through_circular_economy_jobs.pdf

[31] See also The Ellen MacArthur Foundation's report *"Reuse – Rethinking Packaging* https://ellenmacarthurfoundation.org/reuse-rethinking-packaging

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

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

Yet despite these benefits, businesses have generally been slow to deliver, citing several barriers including supply chain disruption, increased food waste and whether consumers will adapt their behaviours accordingly. Cost is also a key challenge, with Tesco recently reporting that "at the current scale, our pilots showed that the cost of cleaning and prefilling reusable packaging can sometimes cost more than the actual product inside."[34]

The government has failed to put in place policies which incentivise large scale shifts to reuse and refill, levelling the playing field and minimising first mover disadvantage. Indeed, in the packaging sector, research has found that in 2020 just 2% of the products sold by the world's biggest consumer goods firms came in reusable packaging.[35]

[34] https://www.tescoplc.com/blog/reusable-packaging-update/
[35] https://www.edie.net/news/5/Ellen-MacArthur-Foundation--Refillable-packaging-still-accounts-for-just-2--of-the-market/

Increasing reuse in the UK

The government has stated that "in line with the waste hierarchy…we would like to see a shift away from single-use items to reusable or refillable alternatives".[36] However, policy is currently failing to drive these changes. The following section assesses two priority sectors which could rapidly benefit from greater reuse and refill of packaging if the right policies are implemented: food and drink and retail. It also outlines the potential for reusable nappies and wet wipes. This is a snapshot of the potential for reuse, with the principle of keeping materials in use having relevance to almost every sector of the economy.

1. Food and drink sector

Current approaches aren't working across the food and drink sector. While some businesses are moving towards non-plastic alternatives, waste arising from food and drink consumption remains high.

The impact of this is felt on the natural world with plastic items from takeaway food and drink having been found to dominate litter in the world's ocean.[37] Surveys of UK beach litter by Surfers Against Sewage have found that litter is dominated by large food and drink manufacturers, see right. [38]

Across the country, waste is high across all product types and coffee cups are a particular cause for concern, with a recent Keep Britain Tidy report finding 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.

[36] https://consult.defra.gov.uk/environmental-quality/call-for-evidence-on-commonly-littered-and-problem/supporting_documents/Call%20for%20evidence%20document.pdf
[37] https://www.theguardian.com/environment/2021/jun/10/takeaway-food-and-drink-litter-dominates-ocean-plastic-study-shows
[38] https://www.sas.org.uk/news/research-reveals-coca-cola-and-pepsico-responsible-for-25-of-packaging-pollution-found-on-uk-beaches/
[39] https://www.keepbritaintidy.org/sites/default/files/resources/20200330%20KBT%20Litter%20Composition%20Report%20-%20FINAL.pdf

Plastic sauce sachets are another highly littered item and are generally not recyclable, undermining circular economy goals. On one estimate, 855bn sachets are used globally each year by food and home care brands.[40]

Additionally, there has been a noticeable trend towards the use of so-called compostable and biodegradable packaging materials but usually without transparency on the end-of-life outcomes for these items which primarily require industrial composting treatment.

At present, there is little availability of reusable packaging options for food and drink, with upfront costs for those buying their own reusables 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 within this current system. These financial penalties for doing the right thing are one reason why uptake is currently so low, with reuse disincentivised and the least well off excluded from taking more environmentally friendly actions. Government action is needed to promote reuse across the sector.

Recommended policy response:

- **For take-away drinks, incentivise the uptake of reusable cups**

The government should ensure that its public messaging more effectively encourages the uptake of reusable cups for takeaway drinks, particularly for events[41] and for coffee cups. At present, many people believe that compostable coffee cups are a sustainable option, even discarding them outside believing that they will simply biodegrade.[42]

The government recently consulted on charges on single-use cups which, if delivered in the right manner, could support affordable reusable cup schemes.[43] 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.

A charge has been recommended by the EAC who recommended "that the Government introduces a minimum 25p levy on disposable cups" with the revenue used "to invest in reprocessing facilities and "binfrastructure" to ensure that the remaining disposable cups are recycled."[44]

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

[41] City to Sea's guide on reusable cups for events outlines the steps organisers can take to reduce waste through the adoption of reusable cup schemes https://www.refill.org.uk/wp-content/uploads/2022/08/CTS-Reusable-Events-Guide.pdf

[42] https://packagingeurope.com/consumers-are-trying-and-failing-to-recycle-compostable-coffee-cups-at-home/4940.article

[43] https://consult.defra.gov.uk/environmental-quality/call-for-evidence-on-commonly-littered-and-problem/supporting_documents/Call%20for%20evidence%20document.pdf

[44] https://publications.parliament.uk/pa/cm201719/cmselect/cmenvaud/657/657.pdf

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.[45] 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.

The Government should ensure that businesses benefitting from charges on single-use cups spend this income on reducing costs and other barriers of reusables. Large coffee brands, for example, could use this income to support investment in the cups and infrastructure to make it easy and affordable for their customers to request a drink in a reusable cup which can be returned once the drink has been consumed.

- **For take-away drinks, consider the potential for collection of reusable containers, including coffee cups, through a Deposit Return Scheme (DRS)**

It is essential that reusable cups are as easy to use as possible, with the infrastructure in place to ensure a convenient scheme for consumers. The Government should explore the possibility of incorporating reusable bottles and cups into the proposed DRS. This could include hot and cold drink cups, with deposited cups cleaned and returned to drinks outlets for further use.

More generally, the proposed DRS should follow the model of Germany, where many bottles are returned for refilling through the DRS.[46] An all-in DRS would ensure a wide range of take-back locations for reusable bottles (alongside other reusable containers), making it a convenient option for consumers.

- **For take-away food and drink, design Extended Producer Responsibility to support reuse schemes**

The Government should consider how the Scheme Administrator for EPR could devote a proportion of funds raised from packaging producers towards supporting reusable packaging schemes in sectors such as take-aways. In France, 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.[47]

In the Extended Producer Responsibility consultation last year, the Government sought views on whether a "requirement should be placed on producers, delivered

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[45] https://www.gov.ie/en/organisation/department-of-the-environment-climate-and-communications/?referrer=http://www.dccae.gov.ie/en-ie/environment/topics/waste/litter/plastic-bags/Pages/FAQ%27s.aspx
[46] https://www.dw.com/en/how-does-germanys-bottle-deposit-scheme-work/a-50923039
[47] https://circulareconomy.europa.eu/platform/sites/default/files/anti-waste_law_in_the_daily_lives_of_french_people.pdf

through the Scheme Administrator, to proactively support market development and the commercialisation of re-use systems, through direct funding and to encourage their adoption through modulated fees".[48] Although it appears that this is not the government's favoured approach to EPR,[49] we would still strongly support this proposal and urge the government to use the delay to EPR to consider how the Scheme Administrator can proactively support reuse systems.

Indeed, there is still huge potential to use EPR to deliver a transformation of our packaging systems for food and drink if designed in the right manner. Decisions made over the final design of the scheme will be crucial and this is especially true with the modulated fees on packaging. These must be designed to incentivise reuse, not simply to incentivise recycling.

- **Regulate to require widespread availability of public water refill points**

The provision of public drinking water must be increased. The global Refill app, which provides information on the location of water refill points, has been downloaded more than 380,000 times, demonstrating consumer demand for this less wasteful option. However, it remains difficult in many locations to easily access free water.

We need to ensure that everyone has free and equitable access to refill points when on-the-go. We must look forward and future-proof UK towns and cities from waste by embedding public refill points as a requirement within a future National Planning Policy statement, providing access to free drinking water for people on the go.

- **For eat-in settings, regulate that restaurants cannot provide customers with any single-use products these can be reasonably replaced with reusable items.**

It is welcome that the government is considering consulting on this policy option[50] and we would urge action as soon as possible. Reusable products should always be the default in eat-in settings. The guiding principle should be bans, where it is proven that refillable and reusable alternatives are viable. This would likely be the case in almost all situations with restaurants and cafes where it is generally easy to dispense sauces without sachets and provide reusable cutlery, plates and drinks containers. Exemptions should only be made on accessibility grounds.

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[48] https://consult.defra.gov.uk/extended-producer-responsibility/extended-producer-responsibility-for-packaging/supporting_documents/23.03.21%20EPR%20Consultation.pdf

[49] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1063589/epr-consultation-government-response.pdf

[50] https://consult.defra.gov.uk/environmental-quality/call-for-evidence-on-commonly-littered-and-problem/supporting_documents/Call%20for%20evidence%20document.pdf

- **Scale up research and pilots on reusables, creating England's first Reuse Region**

There is positive work happening across the UK piloting reusables. In Scotland, the Ditching Disposables project will support businesses to trial and implement sustainable alternatives to problematic single-use items, offering reusable coffee cups for a deposit, which customers can drop back at participating cafes.[51] In Sheffield, researchers are trialling reusable containers in student eateries with a deposit managed through an app. The 'Many Happy Returns' project will provide important insights into consumer responses to reuse schemes.[52]

However, for the greatest impact, the government should support large-scale trials of reuse in the food and drink sector through supporting a town/city/region as a reuse pilot. This would deliver the following benefits:

- Larger trials will enable much greater numbers of take-back points, helping ensure the success of any scheme.
- Public understanding and engagement with a pilot scheme would be enhanced through larger schemes with more participating outlets and greater publicity.
- Larger pilots will provide a greater understanding of the workings of reuse/refill systems, with consumers ideally able to transition a large proportion of their food and drink consumption to reusables and refillables, rather than occasional consumption.

This pilot would support the government's levelling-up commitments, with the government committing resources to a trial of widespread reusables in a town/city/region in an area of low economic opportunity. To deliver England's first 'reuse region', the government should fund widespread trials of reusables across all food and drink categories in the area (such as support for purchasing reusable containers and ensuring efficient collection and cleaning infrastructure).

To deliver the greatest benefits, the government should concentrate circular economy jobs and expertise in the chosen area through also co-locating the new EPR Scheme Administrator there (which may employ up to 250 staff[53]). This should ideally also be located alongside the Deposit Management Organisation for the proposed DRS, given the interdependencies between the two schemes, providing green jobs and economic opportunities.

Trials should help quickly enable nation-wide roll-outs of reusables/refillables across more sectors.

- **Use fiscal incentives to support reuse/refill**

[51] https://www.comunicaffe.com/zero-waste-scotland-to-deliver-14-projects-to-ditch-disposable-coffee-cups/
[52] https://grantham.sheffield.ac.uk/research-projects/many-happy-returns-plastic/
[53] https://www.letsrecycle.com/news/producer-groups-eyeing-epr-administrator-role/

April 2022 saw the introduction of the Plastic Packaging Tax. In the lead-up to its introduction, encouragingly there was evidence that this policy was driving behaviour change, with businesses seeking out recycled content to ensure their products were exempt from the tax.[54]

In line with tax incentives in other green sectors, e.g. 0% VAT on energy-saving technologies for households and businesses, the Government should explore how low / zero VAT policies could incentivise the mainstreaming of reuse. Currently, reusable packaging[55] is subject to the existing rate of VAT – reducing or even zero rating these items would support businesses, at a minimum, to align their pricing with products in single-use packaging or even sell them at more competitive prices. This approach is supported by the Advisory Committee on Packaging.[56]

Another approach could be to support producers with fiscal incentives to invest in reuse systems. For example, the financial outlay for a food service business to replace their single-use packaging with reusable tableware could be considerable and government support may be necessary to make this transition.

2. Supermarkets and other retail

EIA and Greenpeace UK's latest Checking Out on Plastics report revealed that during 2019, the 10 major supermarkets in the UK put 896,853 tonnes of plastic packaging on the market. This was a reduction of 1.6 per cent over the previous year, but a 1.2 per cent increase compared to 2017.[57] One of the key barriers identified by consumer research is that 40% of people think reuse and refill will be more expensive.[58] 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.[59]

The model of quick, cheap and readily disposable items is deeply embedded in retail business models. This has been demonstrated to be difficult to shift without concerted government action.

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[54] https://www.letsrecycle.com/news/plastics-tax-one-of-many-factors-driving-plastics-prices/
[55] The definition of "reusable" needs clarity to avoid industry simply relabelling packaging
[56] https://npwd.environment-agency.gov.uk/FileDownload.ashx?FileId=2a76958d-dad3-4ad5-9126-9bdf94b76799
[57] https://eia-international.org/report/checking-out-on-plastics-iii/
[58] https://www.packaginginsights.com/news/refill-and-reuse-unilever-launches-cif-ecorefill-removing-15-million-plastic-spray-bottles-from-shelves.html
[59] Accessed January 2022. 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

Recommended policy response:

- **Eliminate hard-to-recycling non-essential single-use products, including some plastic packaging formats**

This includes setting targets to reduce plastic packaging by 50% by 2025 (against a 2019 baseline) and mapping out long-term plans for cutting single-use plastic, with shorter term milestones built in. Targets must apply to both branded and own-brand goods and should achieve an absolute reduction (without being tied to sales or growth). Methods for achieving these targets should prioritise removing non-essential single-use packaging altogether and shifting into reusable packaging, rather than light-weighting or swapping one single-use material for another.[60] Achievability of such measures has been demonstrated by Greenpeace UK's 2020 report which outlines how UK supermarkets can halve throwaway plastic by 2025 by reducing plastic across 54 grocery categories.[61] Direct elimination of single-use flexibles is also a policy response that is being proposed by the Ellen McArthur Foundation.[62]

- **Place charges on the worst offending items to incentivise reusables and urge businesses to invest charges in reuse schemes**

While the ideal solution is to ban all unnecessary single-use items, no matter what material they are made from, charges will have a role to play with items which are still justified on the compelling necessity of their use. The full environmental and social cost of packaging waste should be fully internalised into the cost of packaging so that the cost of producing packaging truly reflects its actual impact. This would also mean that reusable and refillable options are cheaper overall compared to single-use alternatives.

The millions of pounds businesses receive from customer charges on single-use items should be spent on reducing the initial costs of creating reusable systems, delivering savings to society over time. 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

[60] https://eia-international.org/wp-content/uploads/Checking-Out-on-Plastics-III.pdf
[61] https://www.greenpeace.org.uk/news/uk-supermarkets-can-halve-throwaway-plastic-by-2025-by-reducing-plastic-across-54-grocery-categories/
[62] https://ellenmacarthurfoundation.org/move-away-from-single-use-flexibles-direct-elimination

charges and ensuring businesses invest these customer proceeds into reuse and refill systems.

- **Government must track reusable packaging use and work with businesses to encourage greater uptake of standardised packaging**

When it comes to packaging design, there is some complexity which will require a balancing act between incentivising reusable and refillable packaging vs. market proliferation of heavier (more resource intensive) reusable items. To avoid a "bags for life" scenario, where the use of heavier bags for life has skyrocketed over recent years since the single-use bag charges were introduced,[63] we would ideally have a system whereby the number of uses can be tracked to ensure we are maximising the benefit of reusable packaging. Effective technologies such as QR codes and blockchain already exist and are poised to support this.

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. This should include financial support and incentives.

- **Place requirements on grocery retailers to promote and incentivise reuse**

Changes in shopping patterns could be harnessed to support a shift to reuse, with the move to greater online shopping[64] bringing opportunities to rethink how our goods are designed and packaged (for instance brands and retailers could reassess how they promote brand recognition, with less reliance on unique packaging to appeal to the in-store shopper).

France has put in place policies that enable and promote the sale of products without packaging or in containers which can be reused. This means 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. In addition, the French government has obligated retail shops with a sales area greater than 400 m^2 to ensure that clean or reusable containers, which replace non-reusable packaging, are available to the consumer.[65] Further, a display in retail establishments will inform consumers

[63] https://www.theguardian.com/environment/2021/apr/18/supermarket-bags-for-life-must-cost-more-to-cut-plastic-use-urge-campaigners
[64] https://www.weforum.org/agenda/2021/07/global-consumer-behaviour-trends-online-shopping/
[65] https://eeb.org/wp-content/uploads/2020/05/No-time-to-waste_Europes-new-waste-prevent_web.pdf

about the rules for cleaning and the suitability of reusable or recyclable containers.[66] This has also been coupled with a ban on plastic packaging for many fruits and vegetables sold in-store. These policies are a strong signal that consumers can easily use their own reusable containers and should improve public awareness. The Westminster government should show greater international leadership on this issue and adopt similar policies.

Regulatory barriers which hamper uptake of more reuse and refill schemes should be addressed, e.g. those relating to manual handling by staff in supermarkets or weights and measures .

- **For food and drink packaging, ensure that online retailers are producing reusable containers which can be returned, including through the Deposit Return Scheme (DRS) system**

There is great potential for online retailers, particularly, to offer take backs of reusable packaging. Indeed, in an assessment of pre-filled packaging trials, Tesco recently noted that "online shopping potentially lends itself particularly well to prefilled packaging solutions, as the retailer can be responsible for delivering and returning the packaging."[67]

One possible means of delivering this is with the proposed Deposit Return Scheme system which is set to include online deliveries, so supermarkets and others with online services will have to take back empty containers. With the concept of zero waste grocery deliveries already established,[68] there is a huge opportunity to require large firms to go beyond recycling, adopting reusable packaging for this market which can be returned, cleaned and reused.

- **Set targets for reuse under the new Environment Act target setting process and EPR**

To drive change in retailers, the government should introduce targets under the Environment Act target process which support greater reuse. The government's proposed target to halve residual waste by 2042 is inadequate in this regard; it can be achieved simply with higher levels of recycling, much of which will be exported.[69] A

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[66] https://eeb.org/wp-content/uploads/2020/05/No-time-to-waste_Europes-new-waste-prevent_web.pdf
[67] https://www.tescoplc.com/blog/reusable-packaging-update/
[68] Good Club | Zero Waste Groceries Delivered to Your Door
[69] Other problems with the proposed target include the exclusion of food waste and the lack of a resource-related target, see p.35 https://www.wcl.org.uk/docs/Environment_Act_targets_consultation_response.pdf

target is required which focuses on driving down overall resource consumption levels, with reuse promoted as a key approach for reducing the amount of material we consume from packaging.

The government has confirmed that reuse targets will be consulted on for EPR in its second year of operation. Former Waste Minister Jo Churchill MP explained that with EPR "we want to get people to use less, so reducing consumption, and to reuse items as much as we can... As it stands, we will consult on reuse targets by 2025, but we are very much in that work phase at the moment."[70] These targets must be ambitious, ideally aiming for 100% reusable packaging for some sectors. This is achievable in sectors including:

- Eat-in food and drink
- Toiletries and single service condiments in hotels
- Consumer boxes for large white goods

Overall targets should aim for:

- At least 25% of consumer packaging should be reusable by 2025, increasing to 50% by 2030.
- At least 75% of transit (or secondary and tertiary) packaging should be reusable by 2025, increasing to 90% by 2030.

Ambitious targets will be required to maintain a comparable level of ambition with the European Union, which is expected to announced reusable packaging targets in late 2022.

3. Nappies

In the UK, 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.[71] They also cause significant contamination in recycled waste streams[72] and are extremely difficult to recycle given their complex composition of multiple materials. This means they are commonly incinerated or sent

[70] https://committees.parliament.uk/oralevidence/10190/pdf/
[71] 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
[72] https://www.keepbritaintidy.org/news/more-million-people-uk-try-recycle-nappies

to landfill, exacerbating carbon emissions and air pollution.[73]

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.[74] Switching to reusable nappies also saves families up to €2,000 per child.[75]

Recommended policy response:

- **Government must work with businesses to encourage greater uptake of reusable nappies**

Government action is needed to ensure that the negative impacts of single-use nappies are internalised in their cost. While limited use of single-use nappies may need to remain, the focus should be to help the majority switch to reusables through potential nappy collection services, encouraging businesses to offer free starter packs, and bringing the costs of reusables in line with single-use products.

4. Wet wipes

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 tennis courts and over a metre tall in the past six years.[76] 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.

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[73] The Heart of Recycling (2020) Recycling Nappies. Available at: https://recycling.co.uk/recycling-nappies/

[74] 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://zerowasteeurope.eu/wp-content/uploads/2019/12/bffp_single_use_menstrual_products_baby_nappies_and_wet_wipes.pdf

[75] 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://zerowasteeurope.eu/wp-content/uploads/2019/12/bffp_single_use_menstrual_products_baby_nappies_and_wet_wipes.pdf

[76] https://www.thames21.org.uk/2021/11/laser-scans-show-devastating-impact-of-wet-wipes-on-the-thames/

They are also a major contributor of 'fatbergs' which block sewers, costing a huge amount to clean up.[77]

Recommended policy response:

- **Government must work with businesses to encourage greater uptake of reusable wipes**

The government are asking for views on banning plastic in wet wipes.[78] 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 other measures must be implemented to support reusable wipes.[79] This will reduce the amount of material entering the sewerage system and result in a more circular system.

Consumers should be supported to move to reusable products, especially for sanitary products which are generally not recycled. Government action is needed to ensure that the negative impacts of single-use wet wipes are internalised in their cost. While some wet wipe use will need to remain for accessibility reasons, as with nappies the focus should be to help the majority switch to reusables through public information campaigns and bringing the costs of reusables in line with single-use products.

[77] https://www.itv.com/news/westcountry/2021-04-22/warning-not-to-flush-wet-wipes-as-giant-fatberg-removed-in-plymouth
[78] https://consult.defra.gov.uk/environmental-quality/call-for-evidence-on-commonly-littered-and-problem/supporting_documents/Call%20for%20evidence%20document.pdf
[79] For a full assessment of the policies needed to reduce the harm caused by wet wipes, see https://www.wcl.org.uk/docs/assets/uploads/Link_Call_for_Evidence_on_commonly_littered_and_problematic_plastic_item_response.pdf

Conclusion: beyond bans

Reusing items offers the best solution for a transition away from the current model of single-use consumption. Each year the UK consumes billions of items with negative environmental impacts which cascade around the globe. If delivered in the right manner, moving to a reusable society would be greener, cleaner, and more cost effective than our current system.

This report has shown that reuse and refill offer a compelling and necessary alternative, one that will be essential for meeting the government's targets to double resource productivity, cut greenhouse gas emissions, and eliminate avoidable waste.

With the waste, climate, and nature crises requiring action to urgently avert environmental breakdown, we call on the government to go beyond bans, ensuring that action to drive greater reuse is delivered as soon as possible.

Wildlife and Countryside Link is the largest environment and wildlife coalition in England, bringing together 65 organisations to use their strong joint voice for the protection of nature. For more information contact Link's Resources and Waste Policy Officer Matthew Dawson e:matthew@wcl.org.uk