



House of Commons

Environment, Food and Rural
Affairs Committee

**Plastic food and drink
packaging: Government
Response to the
Committee's Sixteenth
Report of Session
2017–19**

**First Special Report of Session
2019–21**

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The Environment, Food and Rural Affairs Committee

The Environment, Food and Rural Affairs Committee is appointed by the House of Commons to examine the expenditure, administration and policy of the Department for Environment, Food and Rural Affairs and associated public bodies.

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First Special Report

The Environment, Food and Rural Affairs Committee published its Sixteenth Report of Session 2017–19, *Plastic food and drink packaging* (HC 2080), on 12 September 2019. The Government response was received on 9 March 2020 and is appended to this report.

Appendix: Government Response

Introduction

The government thanks the Committee for its report on plastic food and drink packaging.

This government wants to leave our environment in a better state than we found it. Our *25 Year Environment Plan*, published in January 2018, outlines steps to achieve that ambition. The Plan sets out targets to work towards eliminating all avoidable waste by 2050. Our Resources and Waste Strategy, published in December 2018 set out our approach to reducing waste, promoting markets for secondary materials, incentivising producers to design better products and better management of products and materials at the end of life by targeting environmental impacts.

We believe it is important to look at the packaging producer responsibility system and waste management system as a whole, in order to drive the best environmental outcomes. As the Committee's report outlines, earlier this year we have already begun work, consulting on a suite of measures to reform these systems, with further work planned over the coming months. We are also seeking powers in the Environment Bill to ensure the outputs from this work can be implemented.

The Committee looked at a number of issues, which the Government has addressed below.

Response to EFRA's conclusions and recommendations

Recommendations 1 & 2: *In order to make evidence-based policies and assess their impact, the Government needs access to reliable data. It is shocking that it does not know how much plastic packaging is placed on market in the UK, nor how much is really recycled.* (Paragraph 17)

The current de minimis threshold that determines which businesses are obligated to report on how much packaging they produce is too high. We consider that the current de minimis threshold should be lowered from 50 tonnes to one tonne, to enable more accurate data gathering on how much plastic packaging waste the UK produces and how much is recycled. This should ensure that small and microbusinesses are still exempted. (Paragraph 18)

The Government recognises the need for accurate data. The view of successive governments since the packaging waste producer responsibility obligations were first introduced has been to minimise the impact of government regulations on micro, small and medium sized enterprises. For this reason there has been a de minimis threshold which has meant the government has had to estimate the 'unobligated' portion of packaging placed on the market. Using surveys to provide information and making informed estimates in the absence of complete data is not an uncommon practice in producing a whole host of

government statistics and data when a census is not available. The Government of course recognises that the underpinning data needs to be updated to provide as accurate a picture as possible. In 2018, we commissioned an update to the PlasticFlow report for plastic packaging data (PlasticFlow 2025), updating our data on packaging waste arisings and reducing uncertainty further, prior to regulating for new targets. The various Packflow reports provide an estimate of the unobligated tonnages for each packaging material. The Environment Agency also has a regular audit and inspections regime to monitor compliance and ensure equity of data.

The current complying producers account for an estimated 85% of all packaging. In our consultation on reforming the producer responsibility system for packaging earlier this year, we proposed removing or lowering the de minimis for packaging producer responsibility. This would further improve our understanding of the packaging that is placed on the market and could bring every (or nearly every) producer in to scope, providing data on 100% of packaging placed on the market. However, there would be a proportionate increase in compliance monitoring and enforcement costs. Responses to the consultation on this were mixed and we are therefore still reviewing this proposal. We are carrying out further research to improve our understanding of the number of businesses that would be obligated if the point of compliance and/or the de minimis was to change. This will aid us in our understanding of the costs and benefits of potential different options. In setting the policy direction for this measure we want to ensure that no unnecessary burdens are placed on small businesses.

Recommendation 3: *The UK recycling rate for plastic packaging is estimated to be around 46 per cent. However, because of the de minimis threshold, uncertainty over how much exported plastic waste is recycled and whether waste is weighed to take contamination into account, that figure is likely to be inaccurate. The Government and WRAP should set out what the margin of error is for current and future plastic waste recycling statistics, taking these factors into account. (Paragraph 19).*

WRAP includes an assessment of the margin of error in the estimates of packaging placed on the market in the Material Flow reports it produces for government. A margin of error assessment was included in the Plastics Packflow report published in August 2018 and in the most recent Material Flow reports for Glass, Paper & Card, Wood and Metal packaging published in September 2019. The Plastics Packflow report estimates a margin of error of +/-7% for the consumer sector and +/-11% for the non-consumer sector.¹ The material flows reports for glass, paper, cardboard, wood and metal estimate margins of error ranging from +/- 7–12% across these materials.²

We are also undertaking a review of methodologies for estimating packaging placed on the market and packaging waste arisings with a view to improving the methodologies and reducing uncertainty further prior to regulating for new targets.

We have noted the committee's concerns about our waste data and are taking several actions to improve this. In 2018, The Environment Agency (EA) re-structured their monitoring and compliance system for producer responsibility to a central, national

1 http://www.wrap.org.uk/sites/files/wrap/PlasticFlow%202025%20Plastic%20Packaging%20Flow%20Data%20Report_0.pdf

2 <http://www.wrap.org.uk/content/new-material-flow-reports-glass-paper-card-wood-and-metal-packaging>

system. This system went live in April 2019 and is already improving levels of monitoring and therefore the reliability of data. Between April and September 2019 the EA carried out 73 audits of registered producers, as compared to 38 in the same period in 2018.

From this year, the EA will also trial a new approach to monitoring data and compliance from packaging producers. At the moment operators are targeted for monitoring using 'RAG' scoring. This scoring is based on several factors depending on the type of operator and include previous non-compliance and the size of business. Those operators that are flagged as red are considered high risk, amber as medium risk and green as low risk. Compliance monitoring activities are targeted at those red operators as a priority. Those considered green in the 'RAG' database may have a lower level of compliance monitoring.

The new approach will use a mixture of targeted 'RAG'-based monitoring but also random sampling of the outliers, currently not targeted. This will allow the EA to be sure that they are correct in classifying operators with a green status and will confirm whether the RAG system is actually identifying the correct sites for additional compliance monitoring.

In our consultation on reforming the packaging producer responsibility system, we also consulted on a number of detailed questions that related to current data, the current compliance monitoring and enforcement regime for packaging producer responsibility and a number of proposals as to how it could be strengthened and improved. It also asked questions about additional measures that may be required for a reformed system, and about any issues concerning collecting data across the UK.

Responses to the proposed measures to strengthen data collection, compliance monitoring and enforcement of the system were mixed. We will undertake further work with the Regulators and stakeholders to consider, develop and present effective measures to further strengthen data reporting, compliance monitoring and enforcement that are appropriate to the proposed governance approach.

It should also be noted that Article 5 (2) of Decision 2005/270 EC states that correction for low levels of non-target or contaminant is not required:

“The weight of recovered or recycled packaging waste shall, as far as is practical, exclude non-packaging materials collected together with the packaging waste. Corrections shall be made to the data relating to the weight of recovered or recycled packaging waste, if non-packaging materials in the waste sent to an effective recovery or recycling process risk leading to substantial over- or underestimates of packaging recovery or recycling rates. No corrections shall be made in the case of small amounts of non-packaging materials, or for such contamination as can regularly be found in packaging waste.”

Given the direction provided by the EU Commission, the UK Government considers it has been compliant with its reporting formats for packaging waste.

We also recognise the problems and data uncertainties, referenced by the committee, in relation to some waste exports. We want to tighten controls over exports of all wastes.

In the Government's Resources and Waste Strategy we committed to consult on a suite of measures such as increased monitoring of waste shipments; improved provision for waste repatriation; and charging higher fees to improve compliance. These consultations will be published in due course. These changes would aim to ensure any waste we do send abroad

is fit for recovery, and that it is recovered to equivalent standards as required in the UK. This should create a more level playing field for domestic re-processors as well as reducing the chances of waste exports being mishandled.

There was also a commitment in the Conservative Party manifesto in 2019 to ban plastic waste exports to non-OECD countries.

Recycling

Recommendation 4: *We support the Government's proposals for extended producer responsibility so that producers pay the full net cost of managing packaging at end of life. (Paragraph 26)*

We thank the committee for their support of our radical reforms to the packaging producer responsibility system. We are currently developing these proposals further, for a more detailed consultation in this year, and are engaging with other Government Departments and the sector as we develop our proposals. We intend to introduce our reforms in 2023. We are seeking powers in the Environment Bill to enable us through regulations to require producers to pay the full-net-costs of dealing with packaging once it becomes waste.

Recommendation 5: *We are concerned that exemption for imported, filled packaging from the plastic packaging tax could encourage off-shoring of production, to the detriment of UK manufacturing. It would also undermine the environmental ambition of the tax to increase recycling. Imported, filled packaging should be subject to the plastic packaging tax. (Paragraph 30)*

As set out upon the publication of the summary of responses to the consultation on the design of the plastic packaging tax, the government acknowledges the strong views in favour of including filled imports in scope of the tax and will consider carefully the arguments made for inclusion.

Recommendations 6 and 7: *Having a fixed 30 per cent threshold for the plastic packaging tax is too blunt an instrument. In some cases, it is too low, considering that packaging such as PET bottles are already on market with a higher percentage of recycled content. With regards to food contact packaging, it is too high, given the regulatory limitations around using recycled plastics. (Paragraph 36)*

Rather than having a fixed 30% threshold, the tax should be modulated, so that there are lower fees for higher levels of recycled content. This would avoid the threshold acting as a cap, beyond which there is no incentive for using recycled plastic. Food contact packaging should be exempted from the tax for a period of 18 months to allow new materials that meet the necessary, strict food hygiene requirements to be approved for use. (Paragraph 37)

As set out in the summary of responses to the consultation on the design of the plastic packaging tax, the government notes the variety of views on the recycled content threshold and will continue to consider which approach will best support the objectives of the tax while minimising administrative burdens. The government acknowledges that many respondents sent information on products where they consider it could be challenging to increase the level of recycled content and will consider this carefully in designing the tax.

During the consultation, we received views both that the tax should be introduced earlier than or later than 2022. We recognise the need to tackle this problem as quickly as possible, which is why the tax will be introduced by 2022, incentivising faster and wider action than voluntary initiatives whilst also giving businesses time to adapt.

Recommendation 8: *We support the introduction of consistency in recycling collections across England. The Government should allow local authorities to decide how recycling should be collected, but all should be required to collect an agreed core set of dry materials for recycling. This would aid the development of more consistent labelling for consumers. (Paragraph 47)*

We welcome the committee's support for consistent recycling collections. We want to make recycling less confusing for people by making sure a consistent set of recyclable materials are collected by all local councils, as well as frequent food waste collections. We also want to see consistent labelling on packaging so consumers know what they can recycle. We expect to see household waste recycling rates increase, from around 45% (2018) to 55% by 2029. This work will be taken forward over the coming months and we will bring forward more detailed proposals for consultation this year. Subject to that, changes would come into force from 2023.

The Environment Bill, will provide powers to allow for local authorities to collect the same materials from households. It will also provide powers to introduce consistent labelling on products. Government also continues to acknowledge that local authorities are best placed to understand local challenges and to deliver services at local level. Therefore, when it is not technically, economically or environmentally practicable to collect dry recyclate in separated streams, the Environment Bill will allow for different dry material streams to be collected together.

Any new financial burdens introduced will be assessed and the net additional cost will be covered by the government. Under a reformed packaging producer responsibility system, packaging producers would be responsible for the full cost of managing packaging waste. This will also help reduce the costs borne by local authorities.

In order to ensure that households experience a similar level of waste and recycling service provision across the country, Government will consult this year on statutory guidance for collections. Local Authorities would be required to have regard to the guidance in providing household waste collection services and in the provision at Household Waste Recycling Centres. The guidance would cover the core set of dry recyclable materials to be collected, containment (size of bins) that households should be provided and the frequencies for recycling collections. The guidance would be developed with local authorities and waste collectors and based on industry evidence. Local Authorities would be able to deliver services beyond that set out in guidance where they wish to do so.

Recommendation 9: *The On-Pack Recycling Label (OPRL) scheme, while visually clear, is based on local recycling services. Inconsistencies in recycling collections make it impossible for plastic packaging to be labelled with accurate and useful information for consumers. As consistency in recycling collection is introduced, the Government should encourage the development of a binary labelling system whereby packaging is simply labelled either as recyclable or not recyclable. (Paragraph 48)*

As mentioned above, introducing consistent collections should also enable consistent labelling on packaging so consumers know what they can recycle. In our consultation on reforming the packaging producer responsibility system, we consulted on a mandatory obligation on producers to label their packaging as recyclable or not recyclable. Respondents to the consultation indicated overwhelming support for a simple labelling scheme. In our summary of responses, we indicated that we are minded to take forward our proposal for a mandatory labelling scheme subject to further analysis and legal considerations. We have commissioned research to gain a greater understanding of the costs, timescales and practical considerations for businesses of adopting a mandatory packaging labelling scheme.

We have proposed new powers in the Environment Bill that will enable government to make regulations that require the provision of resource efficiency information in relation to specified products and /or packaging. Resource efficiency information can include the ways in which packaging waste can be disposed of including whether it can be recycled or not. This would therefore form the legislative basis for the proposed packaging labelling scheme.

Recommendation 10: *Some symbols on plastic packaging misleadingly indicate recyclability, confusing consumers. While the Resin Identification Codes are used by recycling reprocessors, the Green Dot symbol serves no useful purpose for either consumers or the recycling industry in the UK. In addition, the Green Dot logo could be misinterpreted to indicate that the packaging is recyclable, thus leading to contamination of recycling. We recommend that the Green Dot should be removed from plastic packaging produced and placed on market in the UK. (Paragraph 49).*

As we said in our consultation on packaging reform producers currently can voluntarily adopt one of a variety of recycling labels. These include On-Pack Recycling Label (OPRL), green dot (mainly seen on imported products), the mobius loop and symbols specific to plastic, glass, steel and aluminium; the most widely used being OPRL. Research shows that consumers do look at the labelling on packaging, but the different labels/symbols mean that consumers face a confusing situation with some labels not applicable in a UK context.

We would like to see a mandatory UK-wide labelling scheme that provides clear information to help consumers to recycle. As referred to in our response to Recommendation 10 we are taking forward further work to develop our proposals and have introduced new powers in the Environment Bill to enable the provision of such information.

Arrangements relating to product standards, including product information and labelling requirements can impact our ability to trade both on the terms set out by the World Trade Organisation and with the EU. Arrangements relating to product standards, including product information and labelling requirements can impact our ability to trade both on the terms set out by the World Trade Organisation and with the EU. The arrangements for our trade with the EU will be dependent on the outcome of negotiations on the terms of the UK and EU's Future Economic Partnership.

Recommendation 11: *We support the introduction of a Deposit Return Scheme (DRS) for drinks containers. It is likely to reduce littering which leads to pollution of the natural environment and would provide consumers with more choice over how to recycle. We*

acknowledge concerns that an all-in model for the DRS might be a threat to kerbside recycling. However, extending producer responsibility so that producers, rather than local authorities, are fully responsible for the cost of dealing with plastic waste would reduce the financial impact of a DRS on local authorities. The Government must monitor the financial impact on local authorities carefully. (Paragraph 58)

We welcome the committee's support for introducing a DRS for drinks containers. We are taking powers in the Environment Bill that will enable us through regulation to establish deposit return schemes that further incentivise consumers to reduce litter and recycle more.

We recognise the concerns that it might be a threat to kerbside recycling and so we will continue to work across government departments and consult with the sector to ensure that the impact on local authorities is accurately assessed and monitored. As the Committee rightly notes our proposals to extend producer responsibility so that producers pay for the costs of managing packaging waste will mean that local authorities will receive payments through the packaging producer responsibility scheme for collecting and managing packaging waste.

We will work to ensure that the impact assessments accompanying the next set of consultations take into account the combined impacts of Consistency, EPR and DRS, and their interactions with local government and its finance systems. Additionally, we have committed to providing financial support to cover the costs of new burdens arising from any new statutory duties on local authorities.

Recommendation 12: *A DRS scheme should ideally be applied consistently across the UK. The Government should ensure that it learns from and collaborates with the Scottish Government as it introduces a DRS in Scotland.* (Paragraph 59)

We already work closely with all the Devolved Administrations in relation to each of our policy measures and will continue to do so. We will discuss how to accomplish a UK-wide approach with the Scottish Government while continuing discussions about the development of our individual deposit return schemes.

Recommendation 13: *In an attempt to boost domestic recycling and the recyclability of plastic packaging, the Government has consulted on a wide range of proposed measures. Many of the Government's proposals, particularly introducing consistency in recycling collections and extending producer responsibility, are welcome and long overdue. However, it is disappointing that comparatively little emphasis has been placed, in recent Government consultations, on reducing plastic waste. Reduction and reuse are more important in the waste hierarchy than recycling.* (Paragraph 62)

The Resources and Waste Strategy places emphasis on the waste hierarchy. Priority goes to preventing the creation of waste in the first place, followed by preparing products for reuse; to recycling, and then recovery. Plastic packaging waste accounts for almost half of all plastic waste so our immediate priority has been focused on our reforms to the packaging waste regulations

We have committed to working towards all plastic packaging placed on the UK market being recyclable, reusable, or compostable by 2025. Extended Producer Responsibility fees

should provide an incentive for producers to reduce the amount of unnecessary and excess packaging they use in order to reduce their cost of compliance and to use packaging that can be re-used or recycled. This will be central to our plans in meeting this commitment.

In addition, the Packaging Essential Requirements Regulations 2015 aim to ensure that no one who is responsible for packing or filling products into packaging or importing packed or filled packaging into the UK, may place that packaging on the market unless it fulfils the essential requirements and is within the heavy metal concentration limits. The Regulations do not apply to packaging that is packed or filled for export outside the EU. The essential requirements are, in summary:

- i) Packaging volume and weight must be the minimum amount to maintain the necessary levels of safety, hygiene and acceptance for the packed product and for the consumer.
- ii) Packaging must be manufactured so as to permit reuse or recovery in accordance with specific requirements.
- iii) Noxious or hazardous substances in packaging must be minimised in emissions, ash or leachate from incineration or landfill.

The Government has committed to review these regulations this year.

As referenced in the report, existing measures such as the 5p plastic bag charge have brought about the kind of changes in behaviour and attitude that we want to encourage. More than 15.6 billion fewer plastic bags have been used since the charge was introduced. The success of the carrier bag charge in reducing the use of single-use plastic bags demonstrates the difference even relatively small incentives can make and we want to build on this by seeking a power in the Environment Bill to be able to place charges on other single-use plastic items.

Additionally, we are also working on a new Waste Prevention Programme. This has identified seven priority sectors, and each will have their own chapters exploring the opportunities, challenges and recommendations for greater waste prevention. Packaging is one of the sectors which will be included in the Programme.

Alternative materials

Recommendation 14: *All food and drink packaging, whether plastic or another material, has an environmental impact. There is a lot of emphasis on plastic waste and pollution, but other impacts such as carbon emissions must also be considered when determining which materials are most suitable for particular applications. In some cases, plastic may be the most suitable material, if waste is properly managed. A lifecycle approach is necessary to ensure that when producers and retailers are considering packaging materials, they are informed about the wider environmental impacts. The Waste and Resources Action Programme (WRAP) should conduct a study that compares the environmental impacts of common food and drink packaging materials using a lifecycle approach. The study should review existing research, including on the environmental impacts of production, transportation, and waste management. Rather than pinpointing which materials should be used, this study should present evidence that retailers and consumers can use when making choices. (Paragraph 68)*

The Government is aware that packaging has an important and positive role to play in reducing product damage, increasing shelf-life, and reducing food waste. Keeping food fresher for longer through innovations such as vacuum packing and re-sealable packs has a significant impact on extending the life of products and reducing waste. If a product is wasted due to insufficient packaging, then its disposal can have a greater environmental impact than the packaging itself.

However there are opportunities where offering food loose may help to reduce plastic waste whilst not affecting shelf life. WRAP has published a technical report on the evidence for providing fresh produce loose. The purpose being to inform a dialogue for retailers on providing loose, uncut fresh fruit and vegetables. This report will inform future published guidance.

As the report highlights, there is also a commitment within WRAP's UK Plastics Pact, which the Government supports, to 'eliminate problematic or unnecessary single-use packaging through redesign, innovation or alternative (re-use) delivery models. The Government supports ongoing industry initiatives, such as Waitrose's 'Unpacked' initiative and others, and expects them to become more widespread as members of the Pact work towards achieving this commitment.

As part of the planned second consultation on reforming the packaging producer responsibility system this year, there will be an accompanying impact assessment. This will include the carbon emissions impacts of packaging throughout its entire life-cycle, from production to end-of-life, incorporating the projected carbon impacts of increased recycling levels.

WRAP is also preparing a document that will outline the key environmental considerations when making packaging choices, as well as providing some examples of different material formats. As part of its citizen engagement activities WRAP also intends to raise awareness of these wider considerations when it comes to packaging, including the role it can play in preventing food waste.

Recommendation 15: *Although industrially compostable plastic packaging is appealing as an alternative to conventional plastics, the general waste management infrastructure to manage it is not yet fit for purpose. In addition, we are concerned that consumers are confused about how to dispose of compostable packaging, particularly if there is no dedicated compostable waste bin available. This could result in contamination of dry recycling as well as littering. We therefore don't support a general increase in the use of industrially compostable packaging at this stage. It can, however, play a role in closed loop environments, such as sporting events and workplaces with catering facilities, where there is a dedicated disposal and collection service. This must be accompanied by robust communication to avoid contamination of recycling. (Paragraph 84)*

As the report correctly points out, whilst there are some potential benefits to using compostable plastic, the Government is aware of a number of challenges in this area.

A 2015 Government report concluded that existing biodegradability standards are only applicable to very specific conditions such as industrial composters. The Government is concerned that, in the absence of standards, claims about the biodegradability of plastic-

based products cannot be verified leading to potential confusion in the market place, possible increased levels of consumption, and potential environmental harm at the point of disposal.

The Government recognises that innovative biodegradable and compostable plastics could help reduce the environmental impacts of plastic waste if they are disposed of in the right way. However, if biodegradable plastics are mistakenly recycled with other plastics, they have the potential to damage the quality of the new products made from the recycled plastic. Furthermore, concerns persist that plastics which are claimed to be biodegradable, if littered or otherwise released into the environment in an uncontrolled way, may not degrade quickly or at all, and they can only be composted if they meet relevant standards.

As a consequence of these concerns, the government published a call for evidence in July 2019 to examine the demand, benefits, and implications of developing standards or certification criteria for bio-based, biodegradable, and compostable plastics and to better understand their effects on the environment and our current waste system.

Reducing plastic packaging

Recommendation 16: *Reduction is the most important way to reduce waste, and greater efforts need to be put into this. A fundamental shift away from all single use food and drink packaging, plastic or otherwise, is vital for the future protection of the environment. (Paragraph 97)*

As previously mentioned under Recommendation 13, the Resources and Waste Strategy has been developed within the framework of the waste hierarchy. The Government is currently working with retailers and WRAP to encourage their efforts to reduce waste and to explore the introduction of plastic-free initiatives in which fresh food is sold loose, giving consumers the choice. As referenced above, our upcoming Waste Prevention Programme will also set out our next steps on this issue.

Recommendation 17: *In its response to this Report, the Government should explain how it intends to transpose the EU Single Use Plastics Directive, or to ensure an equivalent or better alternative. The Government should clarify how it intends to ensure that banning single use plastics doesn't lead to worse overall environmental outcomes, particularly with regards to carbon emissions. (Paragraph 98)*

The UK is proud to be at the forefront of international work in managing issues surrounding waste and plastics. It is the Government's ambition to use the opportunity of leaving the EU to refresh and renew our environmental policy to reduce the reliance on single use plastics and eliminate avoidable waste to minimise the impact we have on our wildlife and natural habitats.

The UK voted in favour of the Single Use Plastics Directive, and an assessment of the legislative work required to transpose the directive, is currently being carried out. Many of the measures in the Single Use Plastics Directive, are in line with commitments made in the 25 Year Environment Plan and more specifically in our Resource and Waste Strategy, which sets out our ambitious domestic agenda in this area. Furthermore, England is

already moving faster than the EU in a number of areas, with plans in place to restrict the supply of plastic straws, plastic stirrers and plastic stemmed cotton buds in 2020; this is over a year quicker than the EU proposals in the Directive.

In general, we prefer to help people and companies make the right choice, rather than banning items outright. There may, however, be times when a ban is appropriate as part of a wider strategic approach, such as with plastic straws, stirrers, and cotton buds. We will continue to review the latest evidence on problematic products and/or materials to take a systematic approach to reducing the use of unnecessary single-use plastic products, including problematic packaging materials. We recognise the important role that plastic plays in certain applications, and any proposed intervention will include an assessment of the relative costs and benefits of alternative materials. We will publish an evaluation plan for the Resources and Waste Strategy later this year, which will set out our approach to evaluating the impact of policies in the Strategy.

Recommendations 18 and 19: *Government and retailer initiatives to reduce the use of plastic products, have encouraged consumers towards alternatives such as reusable carrier bags and refillable drinks containers. However, these are relatively small-scale changes compared to the consumer behavioural shift that would be required to use reusable containers for grocery food and drink purchases. We are pleased that unpacked and “zero waste” options are becoming increasingly available to consumers, including online delivery models. However, these changes are unlikely to enable a revolution in the way most consumers shop unless they are widely available. (Paragraph 99)*

The Government and WRAP should conduct a review of reusable and refillable packaging systems for food and drink to determine what works and where Government intervention might be appropriate to encourage retailers to offer refillable options, and consumers to use them. This should include an assessment of the environmental impact of reusable packaging, such as how many times items would need to be reused before they became more beneficial than single use packaging. It should also consider how to manage food hygiene and potential cross contamination of food containing allergens. (Paragraph 100)

Reuse is central to The UK Plastics Pact. As previously outlined, two of its targets, are: the elimination of unnecessary or problematic plastic packaging items through redesign, innovation or reuse delivery models; and 100 % of plastic packaging to be reusable, recyclable or compostable by 2025.

Under the UK Plastics Pact, WRAP hosted an event in November 2019 to bring together shared learnings from existing re-use systems. Following this, WRAP will convene a UK Plastics Pact working group to outline priority activities on reusable and refillable packaging for 2020 and beyond. A number of UK Plastics Pact members have initiated reuse systems including Waitrose and Morrisons refill stations, Unilever with their Cif brand and Tesco has partnered with Terracycle to deliver an online delivery reuse system.

WRAP have also previously conducted research on reusable and refillable packaging options in their two reports: ‘Potential Refill Solutions for the Food and Non-Food Retail Sectors’ (June 2008),³ and ‘Single Trip or Reusable Packaging - Considering the Right Choice for the Environment’ (May 2010).⁴

3 <http://www.wrap.org.uk/sites/files/wrap/Refills%2006%20food%20and%20non%20food%20Report.pdf>

4 <http://www.wrap.org.uk/sites/files/wrap/FINAL%20Reusable%20Packaging%20Factors%20Report.pdf>

Recommendation 20: *Parliament has taken steps towards reducing plastic packaging on the Estate but needs to continue to lead by example in the removal of single use packaging, regardless of material. Both Houses of Parliament should consider how they can remove the remaining single use packaging from catering facilities on the Parliamentary Estate and enable customers to bring their own containers for takeaway food. We suggest that the Restoration and Renewal programme provides an opportunity to implement any infrastructure changes that may be necessary to enable this. (Paragraph 102)*

We welcome this suggestion and are supportive of Parliament, like all parts of society, moving towards improved sustainability. However, this recommendation is a matter for Parliament rather than Government.