

Written evidence submitted by Greenpeace (PW0024)

Greenpeace is a movement of people who are passionate about defending the natural world from destruction. Our vision is a greener, healthier and more peaceful planet, one that can sustain life for generations to come.

Greenpeace UK welcomes the opportunity to submit to this inquiry and encourages the committee to seek input from those from countries affected by UK plastic waste imports. We would be happy to support the facilitation of calls or meetings.

We are a member of Wildlife and Countryside Link (WCL) and support their submission to this inquiry. The below submission seeks to supplement it, with specific focus on the waste exports question from recent Greenpeace investigations into this issue. For full details of our investigation into UK plastic waste exports in Turkey please see our recent [report](#).

Summary

- The UK is a major contributor to the global plastic crisis, generating more plastic waste per person than any other country apart from the USA.¹ Recent government announcements to tackle plastic pollution are unambitious and generally fail to address underlying systemic problems.
- Public concern about the plastic pollution crisis has never been higher. A recent poll found that 85% of people want the government to make retailers reduce plastic packaging.²
- There is a huge gap between the amount of plastic the UK is producing and the recycling capacity that is currently in place or committed to come online in the next two years. The UK claims a recycling rate for plastic packaging of 46%, but well over half of this figure is exported, often to countries with low recycling rates, thus waste is at high risk of being dumped and burned.³
- The UK government must immediately ban all plastic waste exports to non-OECD member countries and mixed plastic waste to OECD member countries. A complete ban on all plastic waste exports should be in place by no later than 2025. In parallel, the UK government must introduce measures to drastically cut the amount of plastic produced in the first place.

1. What measures should the UK Government take to reduce the production and disposal of single-use plastics in England?

- 1.1. The UK is a major contributor to the world's plastic crisis, generating more plastic waste per person than any other country except the USA. Our recycling system is already overwhelmed by plastic waste, and it is overwhelming other countries' recycling systems too, causing serious harm to their citizens and environment. We must address our over-consumption of both plastics and resources more generally; the government should pursue a reduction-led strategy to phase out all non-essential, single-use packaging and transition to a refillable, reusable society.
- 1.2. The government needs to take urgent action to tackle this plastic crisis. The UK claims a recycling rate for plastic packaging of 46%, but well over half of the amount the government claims is recycled is exported, often to countries with low recycling rates where waste is at high risk of being dumped and burned. The UK government must immediately ban all plastic waste exports to non-OECD member countries and mixed plastic waste to OECD member countries. A complete ban on all plastic waste exports should be in place by no later than 2025. We expand on this issue in answer to the question 6.

¹ Carrington D (2020) 'US and UK citizens are world's biggest sources of plastic waste – study' 30 October 2020 The Guardian <https://www.theguardian.com/environment/2020/oct/30/us-and-uk-citizens-are-worlds-biggest-sources-of-plastic-waste-study>, Law KL et al (2020) 'The United States' contribution of plastic waste to land and ocean' *Science Advances* 6(44): eabd0288 <https://advances.sciencemag.org/content/6/44/eabd0288>

² Greenpeace/YouGov survey results March 2021 https://docs.cdn.yougov.com/bb6116f9hu/Greenpeace_Plastics_UK_210322_1stR_W.pdf

³ National Audit Office (2018) <https://www.nao.org.uk/report/the-packaging-recycling-obligations/>

1.3. The UK Government should take the following measures:

1.3.1. **Reduction target**

1.3.1.1. Public concern about the plastic pollution crisis has risen sharply in recent years. Supermarkets and major consumer goods brands have responded with high profile initiatives designed to show that they take plastic pollution seriously. However, analysis by Greenpeace and the Environmental Investigation Agency (EIA) found that the top 10 UK supermarkets actually increased their plastic footprints by 1.2% between 2017 and 2019, from 886,000 tonnes to nearly 897,000 tonnes.

1.3.1.2. A reduction-led strategy is needed to phase out all non-essential, single-use packaging and a transition to a refillable, reusable society. Therefore, **DEFRA should urgently set and establish a delivery plan for a target to reduce single-use plastic by 50% by 2025. The first long-term binding targets for waste and resources under the Environment Bill framework, once it is passed, should be consistent with this level of ambition**, and place particular emphasis on resource efficiency and waste minimization. Major retailers like Sainsbury's and Aldi have already shown industry leadership on plastic reduction targets, and other supermarkets are likely to commit to their own reduction and reuse pathways within the year. Government plastic and waste reduction targets, combined with mandatory corporate reporting on plastic reduction, would create a level playing field for industry to transition to refill and reuse at scale.

1.3.2. **Extended Producer Responsibility Scheme**

1.3.2.1. The Environment Bill is an opportunity for the government to introduce a new Extended Producer Responsibility (EPR) scheme in 2023 and deliver an "all-in" deposit return scheme (DRS). New EPR requirements should be designed to increase reuse and reduction of packaging as well as eliminate non-recyclables, which should be achieved through a combination of reuse and reduction targets and modulation of fees to incentivise eco-design, reuse and reduction and penalise single-use packaging.

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

1.3.3. **Deposit Return Scheme**

1.3.3.1. The Government's manifesto commitment to deliver a Deposit Return Scheme (DRS) has already been pushed back to "late 2024"⁴ and may now be watered down to a so-called "on the go" design. This is frustrating, a meaningful Deposit Return Scheme (DRS) in the UK is long overdue and DEFRA's delay to 2024 is unnecessary. A DRS should form a core part of the economic and social recovery from the pandemic.

1.3.3.2. The Environment Bill is an opportunity for the Government to deliver an "all-in" DRS, covering all sizes and materials. It would provide the most economic benefit⁵ and would significantly improve rates of recycling and unlock green jobs as the government seeks to "build back better". These are the strongest arguments to make for all-in rather than "on-the-go":

⁴ https://consult.defra.gov.uk/environment/consultation-on-introducing-a-drs/supporting_documents/DRS%20Consultation%20FINAL%20.pdf
https://consult.defra.gov.uk/environment/consultation-on-introducing-a-drs/supporting_documents/DRS%20Consultation%20FINAL%20.pdf

⁵ https://www.wcl.org.uk/docs/assets/uploads/WCL_and_WEL_DRS_consultation_response.pdf

- **Easy to understand for consumers:** restricting a deposit system to certain products only, risks confusing consumers. It puts the burden on them to check labelling to determine if a bottle or can is deposit-bearing. This could lead to disenchantment with the system and potentially with other positive environmental behaviours.
- **Radically reduce litter and environmental impact:** drinks containers of all sizes are littered. Defra Minister Rebecca Pow MP reiterated at the Environmental Audit Committee that an all-in deposit return system will capture 23bn containers and 'on-the-go' will only capture 7.4bn containers.⁶
- **Economically superior:** from Defra's own impact assessment, an all-in DRS is forecasted to bring a £5,885 million (£5.8bn) net economic benefit, while on-the-go will bring £282 million (£0.28bn). This increased economic benefit is vital in a post-pandemic context.⁷
- **More materials available for the circular economy, and business certainty:** an all-in DRS can collect upwards of 90% of drinks containers, with some systems reaching 98%, creating a guaranteed, regular source of high-quality and valuable materials that can be sold for reprocessing and incentivising investment into resource management infrastructure.
- **Strong public support:** businesses and trade bodies, such as Coca Cola and Association for Convenience Stores, and environmental NGOs are in favour of an all-in system. Additionally, public frustration with litter and plastic pollution in particular has been high and CPRE polling shows that 78% of adults think the government needs to do more to tackle litter.⁸
- **Logistical opportunities** for producers to make the switch to refillable bottles, as the infrastructure is often the same. For example, The Oregon Beverage Recycling Cooperative (OBRC), the system operator for the deposit return scheme in Oregon in the USA, was in a 'uniquely advantageous position' to introduce a refillable bottle scheme because they already operated much of the necessary infrastructure, including bottle and can return facilities, trucks and space to house washing equipment. This is a further argument as to why glass should be included within DRS: to allow the option for producers to switch to refillable glass in future.

2. Are the measures announced so far, including a ban on certain single-use plastics and a plastic packaging tax, sufficient?

- 2.1. We are in a climate and nature emergency, and the government's current approach is piecemeal, and demonstrates a lack of courage. The recent ban on throwaway plastic items like plates and cutlery is welcome but long overdue, and the UK government is playing catch up with the EU. After years of talking about being a global leader in this field, the UK government has managed to crack down on a total of three single-use plastic items and rinse off personal care products containing microplastics.
- 2.2. The plastic packaging tax is unambitious in its design and stated goals; over 1 million tonnes of plastic packaging are predicted to remain below 30% recycled content per year.⁹
- 2.3. The government is failing to promote the large-scale shifts in our consumption models which are necessary to meet the Government's environmental and climate targets.

⁶ <https://committees.parliament.uk/oralevidence/1982/pdf/>

⁷ <https://consult.defra.gov.uk/environment/consultation-on-introducing-a-drs/consultation/subpage.2021-02-22.5028524427/>

⁸ <https://www.cpre.org.uk/about-us/cpre-media/rise-in-ppe-litter-since-coronavirus/>

⁹ The Exchequer expects to receive £235m in the first year that the tax is introduced (2022-23) and £210m in 2025-26. At £200 a tonne, this equates to 1,175,000 tonnes of packaging remaining below the 30% recycled plastic threshold in 2022, and 1,050,000 tonnes still remaining below the threshold by 2025-26.

Radical and urgent action, such as setting a legally binding reduction target and a ban on all plastic waste exports, is required.

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

- 3.1. A focus purely on reducing plastics could have adverse impacts. Switching all current consumption of plastic packaging on a like for like basis to the other materials currently used for packaging could almost triple associated CO2 emissions, for example, harming the UK's goal to achieve net-zero emissions by 2050.¹⁰
- 3.2. The best alternatives to plastic consumption are schemes which promote the reuse of items, particularly packaging. The government should consider setting ambitious targets to ensure at least 25% of single use plastic reductions are met by systems of reusable packaging by 2025, rising to 50% by 2030. This would recognize that strong action on reuse will cut greenhouse gas emissions, reduce water stress and lower the environmental damage from resource extraction.¹¹ A recent report by the Pew Trusts showed how elimination and reuse are more economically viable than substitution of materials¹²
- 3.3. For more details see WCL's submission to this inquiry.

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

- 4.1. We do not believe that this target is ambitious enough. Having a target date so far in the future is failing to drive policy in the present. The target is also ambiguously worded and leaves open to interpretation the exact definition of 'avoidable plastic'.
- 4.2. Furthermore, voluntary action by industry is insufficient - we need to see legally binding interim targets and assessments against those targets. To allow for effective scrutiny of the Government's progress against these goals, these should be in absolute values rather than percentages. The solution is to get behind the reduction of plastics in the first instance and support the mainstreaming of reuse systems.
- 4.3. DEFRA should urgently set and establish a delivery plan for a target to reduce single-use plastic by 50% by 2025. The first long-term binding targets for waste and resources under the Environment Bill framework, once it is passed, should be consistent with this level of ambition

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

- 5.1. This commitment in practice lacks a focus on eliminating plastics in the first instance, with producers focusing on achieving recyclability.
- 5.2. The amount of any material being recycled through the system is conflated with other end of life outcomes, with figures suggesting that more is being recycled than it actually is. It is also concerning that the figures in different databases don't match up.
- 5.3. For more details see WCL's submission to this inquiry.

¹⁰ For a full analysis of the risks of material switching and the need for Government action in the Environment Bill to tackle this, see <https://www.wcl.org.uk/docs/Charging%20for%20all%20single%20use%20items%20-%20Link%20Waste%20&%20Resources%20Policy%20briefing.pdf>

¹¹ <https://rethinkplasticalliance.eu/wp-content/uploads/2021/07/Realising-Reuse-Final-report-July-2021.pdf>

¹² Figure 17, p41 https://www.pewtrusts.org/-/media/assets/2020/07/breakingtheplasticwave_report.pdf

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

- 6.1. Greenpeace UK welcomes the inclusion of this question in this inquiry. UK plastic waste continues to be regularly mismanaged once exported, causing serious harm to the natural environment, human health and the well-being of those in receiving countries¹³. We encourage the committee to seek input from people in countries that are affected by the import of UK plastic waste, for example Turkey. **Greenpeace UK is happy to facilitate this.**
- 6.2. The UK government should ban all plastic waste exports to non-OECD member countries and mixed plastic waste to OECD member countries. A complete ban on all plastic waste exports should be in place by no later than 2025. The ban must be accompanied by domestic infrastructure investment and ambitious plastic reduction measures presented above.
- 6.3. The government claims a recycling rate for plastic packaging of 46%, but over half of this figure is exported, often to countries with very low recycling rates where the waste is at high risk of being dumped and burned. It is illegal to export plastic waste from the UK unless it is destined to be recycled or incinerated in an energy-from-waste plant.¹⁴ Yet investigations by the media and environmental organisations reveal significant evidence of exported British plastic waste being dumped and burned illegally, polluting land, rivers and the sea.
- 6.4. In its manifesto, the government committed to banning plastic waste exports to non-OECD countries¹⁵. This recognises the need for the UK to take responsibility for its plastic waste, but doesn't go far enough. In 2020, 80% of the UK's exported plastic waste went to OECD members¹⁶. Limiting the ban to only non-OECD countries wouldn't have covered, for example, the 210,000 tonnes exported to Turkey last year. A ban that only applies to non-OECD members will simply drive more of the UK's plastic waste to OECD members. The government plans to consult on this commitment before the end of 2022 - this consultation must also address OECD countries.
- 6.5. Dumping and burning plastic waste poses a serious threat to people's health. People living near dump sites in Malaysia and other countries say that plastic pollution and burning plastic are causing them respiratory issues such as coughing and difficulty breathing, headaches and itchy, irritated eyes, and are concerned that exposure to these toxic fumes may also be causing problems with menstruation or higher rates of cancer¹⁷.
- 6.6. Until an export ban is in place, measures relating to waste exports within the proposed EPR reforms must include a requirement to evidence the fate of waste at end destinations - this shift in the burden of proof from the point of export to what's actually happening at the other end is an imperative.

¹³ <https://ipen.org/news/toxic-chemicals-plastic-waste-poisoning-people-africa-asia-central-and-eastern-europe-latin-and-microplastic-endocrine-disrupters>
<https://ipen.org/news/toxic-chemicals-plastic-waste-poisoning-people-africa-asia-central-and-eastern-europe-latin-and-microplastic-endocrine-disrupters>

¹⁴ <https://environmentagency.blog.gov.uk/2018/10/29/waste-exports-beyond-the-headlines/>

¹⁵ Conservative and Unionist Party (2019) 'Get Brexit done, unleash Britain's potential: The Conservative and Unionist Party Manifesto 2019' https://assets-global.website-files.com/5da42e2cae7ebd3f8bde353c/5dda924905da587992a064ba_Conservative%202019%20Manifesto.pdf p43

¹⁶ <https://www.uktradeinfo.com/>

¹⁷ Verma R et al (2016) 'Toxic pollutants from plastic waste – a review' *Procedia Environmental Sciences* 35: 701–708 www.sciencedirect.com/science/article/pii/S187802961630158X

- 6.7. Until an export ban is in place, effective monitoring and enforcement of the waste export industry is essential to limiting waste crime and therefore Environment Agency funding and personnel should be increased immediately. **However, better monitoring and enforcement cannot be seen as an ultimate solution or detract from where action is needed, which is an export ban and waste reduction targets.** Our investigations team found that it is impossible to monitor and conclude with certainty that exporters are only sending plastic waste that can and will be recycled properly. To thoroughly check that only clean recyclable polymers are being exported would require unpacking and checking every bale in every shipping container at multiple ports. We understand it would be logistically impossible due to the volume of waste, number of containers and space at ports. Stricter, meaningful monitoring and enforcement, as the only means of managing plastic waste exports, would therefore be financially unviable for the industry. This is only one of the challenges of the current system, ultimately only a waste export ban can prevent the illegal dumping and burning of UK plastic overseas.

Case study: Turkey

- 6.8. Turkey has the lowest recycling rate of any OECD member.¹⁸ INTERPOL noted that this had contributed to an explosion of waste crime, with imported plastic waste dumped illegally and then burned.¹⁹ Almost 20% of the plastic waste entering the Mediterranean Sea each year – an estimated 110,000 tonnes – comes from Turkey.
- 6.9. Ever since China's ban on exported plastic waste in 2017, Turkey has seen a huge rise in waste coming from the UK and Europe. Exports of plastic waste from the UK to Turkey increased by a factor of 18 between 2016 to 2020 and accounted for between 40-50% of the UK's plastic waste exports in the first few months of this year. Nearly half of this is mixed plastic, which is extremely difficult to recycle.
- 6.10. In March 2021, Greenpeace investigators found UK plastic waste dumped and burned in illegal rubbish tips at 11 sites around the Turkish city of Adana. This included packaging and plastic bags from high street retailers such as Tesco, Asda and M&S, as well as Lucozade, Diet Coke and Fanta bottles and a car number plate. At one site, British waste was found alongside a Polish cereal packet with a use-by date of August 2021. Investigators documented piles of plastic waste dumped illegally in fields and by the roadside, or spilling into waterways and floating downstream. COVID-19 antigen tests were also found, demonstrating that the crisis is being exacerbated by the pandemic. Read our Trashed report for more details on the investigation: greenpeace.org.uk/trashed-plastic-report
- 6.11. The UK's decision to send more and more of its plastic waste to Turkey triggered a crisis with lasting environmental and social consequences. The Turkish Street Waste Collectors Association, SATDER, reportedly claimed ²⁰ that imported waste has wiped out the market for the domestic waste collected by its members, and that refuse companies were being paid to take imported containers of contaminated waste. In August 2020, INTERPOL noted that the influx of European plastic waste to Turkey had contributed to an explosion of waste crime, with imported plastic waste dumped illegally and then burned.
- 6.12. In response to Greenpeace's investigation, the Turkish Ministry of Trade has announced that most plastic waste imports into Turkey will be banned²¹. Following pushback from the

¹⁸ OECD.Stat 'Municipal waste, generation and treatment' <https://stats.oecd.org/Index.aspx?DataSetCode=MUNW#>

¹⁹ INTERPOL (2020) 'INTERPOL report alerts to sharp rise in plastic waste crime' 27 August 2020 <https://www.interpol.int/en/News-and-Events/News/2020/INTERPOL-report-alerts-to-sharp-rise-in-plastic-waste-crime>

²⁰ Ugurtaş S (2020) 'Why Turkey became Europe's garbage dump' 18 September 2020 Politico www.politico.eu/article/why-turkey-became-europes-garbage-dump/

domestic waste industry in Turkey, the Ministry of Trade overturned the ban²². However, the Turkish Ministry of Environment then created²³ additional regulations for waste import transactions which protect 1% contamination level for the wastes imported.

- 6.13. **It is unclear how long the UK will be able to rely on exporting its plastic waste.** Turkey joins other countries, including India, Malaysia, Sri Lanka, Thailand and Vietnam in moving to protect themselves from imported plastic waste. In the meantime, as long as this practice is allowed, there is no incentive for the government or industry to move away from business as usual. So far, waste import bans have had no obvious effect on the UK's waste industry. Although the UK's waste exports fell slightly in 2018 (the first year of the Chinese government's plastic waste import ban), 2019 saw the largest volume of waste exports ever recorded.
- 6.14. To conclude, ultimately, the best solution the UK's significant role in driving the global plastics crisis is an export ban and a radical reduction of the amount of waste we produce at home. This is not simply a matter of economics, capacity and recycling but of our global responsibilities to the environmental and human health of places and people around the world.²⁴

²¹ <https://www.bbc.co.uk/news/uk-57680723>

²² <https://www.resmigazete.gov.tr/eskiler/2021/07/20210710-28.htm>

²³ <https://webdosya.csb.gov.tr/db/icerikler/2021-16-sayili-genelge-20210716165454.pdf>

²⁴ Toxic chemicals in plastic waste exports from wealthy countries are contaminating food in developing/transition countries around the world, according to a report by the International Pollutants Elimination Network (IPEN) <https://ipen.org/news/toxic-chemicals-plastic-waste-poisoning-people-africa-asia-central-and-eastern-europe-latin>