

Written evidence submitted by Policy Connect (PW0025)

This document forms Policy Connect's response to the Environment, Food and Rural Affairs Committee's call for evidence on plastic waste.

Policy Connect is a membership-based, not-for-profit, cross-party think tank. We bring together parliamentarians and government in collaboration with academia, business and civil society to inform, influence and improve UK public policy through debate, research and innovative thinking, so as to improve peoples' lives.

We lead and manage an extensive network of seventeen all-party parliamentary groups, research commissions, forums and campaigns in key policy areas including: health & accessibility; education & skills; industry, technology & innovation; and sustainability. We shape policy in Westminster through meetings, events, research and impact work.

In our submission, we have drawn on wide-ranging evidence and stakeholder input from industry, academia and the third sector. These sectors come together in the All-Party Parliamentary Sustainable Resource Group (APSRG) and the Sustainable Resource Forum (SRF) to which we are the secretariat. We have responded to the questions based on our report, "Plastic Packaging Plan: achieving zero 'waste' exports" (2019)¹, as well as other relevant information gathered via our research and events.

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

Measures announced so far facilitate some degree of progress. However, more ambitious policy steps should be taken to encourage the transition to materials circularity and prevent waste from arising in the first place by encouraging greater reuse, refill, remanufacturing and repair wherever possible.

Current measures, such as the ban on certain single use plastics, do facilitate the move away from single use plastics, but this concerns only certain items at the moment. Furthermore, as set out in our response to Question 2, the ban on certain single use plastic items only tackles part of the single use issue by focusing exclusively on plastics, but not the single use culture in general, which can lead to other environmental problems. In addition, the plastic packaging tax, the planned Deposit Return Scheme (DRS) and most of the currently outlined proposals for the new Extended Producer Responsibility scheme (EPR) for packaging focus on encouraging recycling and/or reducing littering. Government should go further than this and focus on steps that prevent waste from arising in the first place through action-oriented policies to encourage greater reuse, refill, remanufacturing and repair wherever possible. The move to models that encourage greater materials circularity would help tackle the issue of single use both in relation to the production, consumption and disposal parts of the problem. Policy should thus take a more strategic approach to tackle the issue of single use culture than the currently outlined policy tools, and more ambitious policy steps should be announced to encourage the transition to materials circularity. Many of the proposals set out in the Waste Prevention Programme for England consultation point towards this direction, but further steps are needed to achieve materials circularity.

¹ The report is available via the following link: <https://www.policyconnect.org.uk/research/plastic-packaging-plan-achieving-zero-waste-exports>

Question 2: How should alternatives to plastic consumption be identified and supported, without resorting to more environmentally damaging options?

The current policy focus to tackle single use plastics should be diversified to include considerations of tackling single use items made of other materials as well. This would help move towards an agenda to tackle the single use and throw away culture in the first instance, which is the primary root of the problem.

The Resources and Waste Strategy for England primarily focuses on tackling plastics when addressing single use items. In line with this, the Environment Bill only seeks to introduce new charges on single use plastic items, but not on single use items made of other materials. However, many single use items are now made from other materials such as wood, which, similar to some plastics, may also not be reusable or recyclable and their use creates further environmental problems.

This policy focus to tackle single use plastics should thus be diversified to include considerations of tackling single use items made of other materials as well. This would help move towards an agenda to tackle the single use and throw away culture in the first instance, which is the primary root of the problem. Therefore, policy should focus on moving towards circularity, and wherever possible, reuse, refill, repair and remanufacturing should be encouraged.

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

We commend the government for confirming its continued commitment to ‘stop offshoring our dirt’. However, it is important that now government demonstrates tangible and ambitious action to fulfil this commitment, including implementing its proposed ban to non-OECD countries and extending that ban to all countries.

Following the 2019 Conservative manifesto commitment, the government confirmed its commitment to use the powers set out in the Environment Bill to ban the export of plastic waste to non-OECD (The Organisation for Economic Co-operation and Development) countries. However, a large proportion of UK plastic waste exports are currently sent to OECD countries (79% in 2020)² and these are also problematic for the environment, which will need to be addressed. The capacity of certain OECD countries to deal with the UK’s plastic waste exports is questionable³. Exports of plastic waste is an issue that is followed with great interest by the general public given the highly detrimental impact on the environment of poorly managed waste.

Thus, instead of giving the Secretary of State the power to regulate the export of waste by destination as outlined in the Environment Bill, a set of quality assurance criteria should be created to determine which countries have the capacity to handle UK plastic waste exports safely.

In addition to immediately ceasing the shipment of plastic waste to countries with low environmental standards, the UK should commit to phasing out all plastic waste exports and decrease its reliance on exporting plastic waste entirely. The UK is currently highly reliant on overseas exports for handling its plastic waste. This has a number of disadvantages compared to domestic processing, including: lack of oversight over where material ends up, exposure to market fluctuations, and loss of value of the material to the UK economy.

² ENDS Report. 2021. MAPPED: The UK’s plastic waste exports

³ Greenpeace. 2021. Trashed: How the UK is still dumping plastic waste on the rest of the world

Avoiding plastic waste exports in the first instance requires to prevent waste from arising in the first place and move materials up the waste hierarchy. This means a move away from the current throw away culture, encouraging greater refill and reuse wherever possible.

As part of introducing the reformed EPR system for packaging, government should introduce targets which incentivise the use of reusable and refillable packaging in all possible instances. In the EPR for packaging consultation proposal, government indicated its intention to introduce “obligations, possibly in the form of packaging reuse targets from 2025”. In order to speed up the shift to reusable and refillable options, it is important the government announces the detailed plans for these and introduces these obligations as early as possible. Moreover, it would be important to review how the currently proposed DRS will work with any ambition to encourage the take up of refill and reuse. The DRS is currently intended as an incentive to reduce littering and increase recycling. However, as refill and reuse must override recycling in all cases where it is possible to do so, it should be reviewed how the DRS will complement reuse and refill models.

In our report, “Plastics Packaging Plan”, we called for government to ban the exports of all plastic recycle anywhere overseas by 2030 at the latest. This is to ensure that they are not entering water courses around the world, and that we are retaining the value and benefits of this material. In addition, this would drive leadership and greater innovation – which itself could then be exported to deal with problems globally. Measures to achieve this ambitious target include:

- **Scaling up domestic recycling infrastructure:** To ensure the UK can reprocess its recyclable material domestically, it is important that it substantially scales up its domestic recycling infrastructure, avoiding that waste is exported, landfilled or incinerated. This requires harnessing the UK’s recycling tech expertise and greater investment in recycling infrastructure.
Strategic leadership will be important to grow the necessary infrastructure for cutting dependence on international markets. The government should ask the National Infrastructure Commission to urgently map out the infrastructure requirements for reaching net zero plastic recycle exports by 2030. The Commission should also consider the need for ‘infrastructure of last resort’ to ensure we do not end up needlessly landfilling or exporting material if recycling targets are not met.
- **Increase the amount of material suitable for recycling:** Household collection is the responsibility of local authorities and currently varies significantly across the country. The present system is often confusing to consumers. Government is seeking to introduce powers via the Environment Bill to standardise collections for five waste streams in England – including plastic, glass, metal, paper and card; and food waste. In the recent consultation on the consistency of collections in England, government indicated the intention to introduce these standardised collection streams from 2023. It is important to ensure the timely implementation of this target to increase the amount of materials collected for recycling, and driven away from landfill and incineration. Besides increasing clarity about the types of material streams collected, it is also important to improve clarity about the collection regimes that currently vary across the country and cause confusion among consumers. Further steps have to be taken to reduce the contamination of plastic recycle.
- **Increase and improve the accuracy data available about the recyclability of materials, as well as about materials exported from the UK to other countries.** As part of this, it is important to accurately monitor the amount of waste exported from the UK, its quality, as well as improve the traceability and transparency of waste exports to be able to accurately track its scale and tackle it.

- **Improve inspection and enforcement**⁴: The UK's illicit waste market was estimated to be worth up to £ 3.7 billion – which is at least double to that of other European states⁵. It is important to ensure that authorities tasked to tackle waste crime, such as making sure that the recently established Joint Unit for Waste Crime is adequately resourced to be able to undertake investigations and enforcement.
- **Empower consumers to do their part**: Besides the measures outlined in our responses above, it is important to consider the role of consumers in reducing plastic waste. This includes education (either formal and non-formal), awareness raising and information campaigns about the importance of circularity, as well as the provision of solutions with which consumers can move away from harmful consumption practices and the single use culture, and consequently, waste is prevented by not arising in the first instance. As part of this, government should dedicate more attention to encourage greater reuse, refill, remanufacturing and repair to make such models are available for consumers. In cases where waste cannot (yet) be prevented, it is important that national government, local authorities and industry work together to create a waste management system that empowers consumers to do their part. They should jointly help consumers who want to do the right thing, and bring on board those that do not currently take steps. Recycling needs to be made simpler for consumers; collections must become more consistent nationally, communication and labelling must improve, and on-the-go recycling infrastructure needs a boost. Mandatory labelling, set out in the recent EPR consultation is crucial steps to facilitate this, but it is important to make sure that labelling is clear, consistent and unambiguous. While labels do not need to come from the same supplier, ideally the recycling label should look the same regardless of which retailer it is sold by and which supplier provides them to improve consumer's understanding about what they need to do to recycle.

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⁴ Environmental Investigation Agency: 2021. The UK's Trade in Plastic Waste

⁵ European Commission. 2021. Mapping the risk of serious and organised crime infiltrating legitimate business. Cited in: Environmental Investigation Agency: 2021. The UK's Trade in Plastic Waste