

Written evidence submitted by The British Plastic Federation (PW0042)

September 2021

Introduction

The British Plastics Federation (BPF) welcomes this EFRA Select Committee inquiry on Plastic Waste, and we are delighted to provide written evidence. The Committee raises important questions as part of the Call for Evidence for the inquiry and we would be very happy to answer any further questions the Committee has after reviewing our answers which are set out below.

About the British Plastics Federation

The British Plastics Federation (BPF) represents the third largest manufacturing sector in the UK, with over 180,000 employees, a turnover of over £27bn and one of the UK's top 10 exports. Established in 1933 the BPF represents companies across the entire plastic supply chain, including polymer producers and suppliers, additive manufacturers, recyclers, services providers, end users, plastics processors, and machinery manufacturers.

Plastic is a resource efficient, recyclable and lightweight material, vital for every major industry to function and it is used in almost every sector of the UK economy. There are a multitude of applications where no other material can fulfil the same functions with an equal or lower greenhouse gas emission footprint than plastics.

Plastics will - and should - continue to play a vital role in all our lives going forward. However, it is important we learn to use plastic more intelligently and we see this Select Committee inquiry as a helpful step forward in ensuring this happens.

Call for Evidence Questions

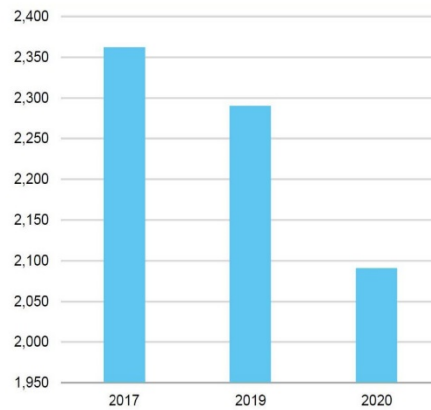
1. What measures should the UK Government take to reduce the production and disposal of single-use plastics in England? Are the measures announced so far, including a ban on certain single-use plastics and a plastic packaging tax, sufficient?

Plastic brings massive benefits to society, and it is important that these benefits are not lost due to a focus on preventing single-use plastics. Plastic packaging helps to extend the life of food and prevent waste. The latter has a much bigger environmental impact than packaging for example, using advanced plastic packaging extends the life of steak by up to 10 days. Food waste is a very significant source of greenhouse gases and if it were a country, it would be the third largest greenhouse gas emitter in the world. Of the entire supply chain packaging only represents 3% of overall carbon emissions of the food and drink supply chain [WRAP, 2020 UK progress against Courtauld 2025 targets and UN Sustainable Development Goal 12.3]. Plastic is also more lightweight and flexible than alternative materials which therefore reduces the carbon emissions associated with the transportation of packaging.

UK households generated in total 26.4 million tonnes of waste in 2018 across all materials [Source: Government Statistical Service, 2020 UK Statistics on Waste]. Although this was a 1.8% decrease from 2017, it is important that the focus is on reducing waste overall, rather than focusing on a specific material (e.g. plastics) when there is a danger that alternatives will be sought which won't

bring any benefits or will be worse for the environment (see question 2). Plastic packaging consumption has been reducing from 2,361 Ktonnes in 2017 to 2,290 Ktonnes in 2019 with a forecast of 2,092 Ktonnes in 2020 [Source: Valpak PackFlow Covid-19 Phase II, 2020]. This means that plastic packaging represents a small amount of the total waste generated.

Plastic Packaging Projected Placed on The Market (tonnes)



Source: Valpak PackFlow Covid-19 Phase II, 2020

Switching from one form of single use packaging to another can result in higher environmental impacts. Single use packaging of all materials should be removed where it does not result in unintended adverse impacts in terms of higher product waste or damage to products. It also needs to be ensured that government legislation does not encourage more complex packaging formats which are harder to recycle.

The BPF believe there also needs to be a focus on increasing recycling and ensuring the UK has the infrastructure to handle more of its waste itself (see question 5). The plastic packaging tax is focusing companies' attention on using more recycled content which will create a greater demand for this material. However, it is important that we drive up recycling at the same time so there is more recycled content available. In addition, it needs to be recognised that without further investment in UK recycling infrastructure, 50% of all plastic packaging will be unable to use recycled content due to a combination of issues including regulatory barriers, technical barriers, and lack of supply. For this reason, to support the development of a world class domestic plastic recycling infrastructure monies raised from the tax should be reinvested into recycling infrastructure.

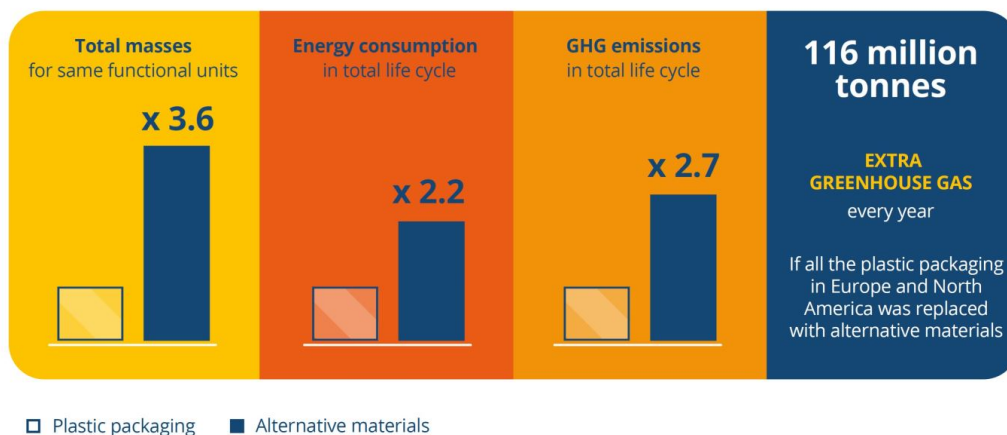
In summary, the measures adopted so far including the introduction of bans, a plastic packaging tax, reform of EPR, the collection of all plastic packaging and a DRS, provide a comprehensive suite of measures that will ensure greater resource efficiency and circularity.

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

All materials have an impact and moving from plastics to alternative materials could have adverse environmental impacts. It is essential that life cycle assessments are undertaken to ensure the best material is used for each function.

Two studies have concluded that greenhouse gases (GHGs) would increase nearly three times [Green Alliance – Fixing the System (2020), Denkstatt (2011)] and a third found they would almost double [Franklin Associates (2018)]. Another 2020 study concluded that, compared to alternative materials, plastic packaging is often the least damaging when it comes to carbon emissions [Imperial College – Examining Material Evidence: The Carbon Fingerprint (2020)]. To put this in perspective, if we were to replace all the plastic packaging in Europe and North America with alternative materials, it could generate an extra 116 million tonnes of GHGs every year [Denkstatt – Plastics and Climate in Perspective, 2020]. In 2018, 18 academics from 15 universities co-signed an open letter highlighting that switching away from plastics to alternative materials could worsen global warming [The Sun – The war on plastic will backfire if it is ‘taxed too highly’ and could ‘increase the spread of food-borne bugs’, warn scientists, 2018].

SOURCE: *The impact of plastic packaging on life cycle energy consumption and greenhouse gas emissions in Europe (2011)*



SOURCE: *The impact of plastic packaging on life cycle energy consumption and greenhouse gas emissions in Europe (2011)*

In summary as discussed above the focus should be on reducing waste from all materials and not just plastics.

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

The UK plastics industry supports the government’s objective of reducing avoidable plastic waste and improving recycling rates. At present 78% of all plastics packaging placed on the market is recovered in the UK [PlasticsEurope, 2020 Plastics the Facts 2020] and nearly 50% is recycled [National Packaging Waste Database].

Plastic packaging consumption has reduced from 2,361 Ktonnes in 2017 to 2,290 Ktonnes in 2019, with a forecast of 2,092 Ktonnes in 2020 [Source: Valpak PackFlow Covid-19 Phase II, 2020]. This means there will be less material within the waste stream in the future.

In seeking to reduce plastic waste further, it is important this does not just lead to material switching. The environmental impacts of potential alternatives to plastic have been discussed in question 2. It is also important that the government considers other policies which could be impacted if there is a drive to switch away from plastics. For example, the government has a target to achieve net zero emissions by 2050 and it is essential, if this is going to be met, that the material used has the lowest possible climate change impacts possible.

In summary, plastic waste needing to be managed at end of life is already reducing both in absolute and per capita terms and the existing suite of government measures will ensure greater resource efficiency and circularity.

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

There has been considerable work done on design for recycling, including work by the BPF such as PackScore which rates the recyclability of packaging. Companies and consumers are much more aware of the impact of their products at end-of-life. However, it is essential that these products can be widely recycled by consumers. The Consistent Collection Consultation has set out that consistent collections need to be in place by the end of the financial year 2023/24 but the collection of plastic films will be later, due at the end of the financial year 2026/27 for households. This means that there would not be an easy to access recycling service for films before the timescale of this target. The UK is one of the few European countries not to offer the collection of all plastic packaging from households, see below.



SOURCE - Adapted from Plastics Recyclers Europe - Flexible Films Market in Europe: State of Play (2020)

The BPF support using more reusable and refillable applications where appropriate, however the recyclability of these products does also need to be considered so they are not destined for disposal at end-of-life. The adoption of reuse and refill models should be based on a full life cycle analysis to ensure there are no adverse outcomes. Unfortunately, in some cases, even though the intention of a product is to be reused many times, people use these product as if they are single use. For example,

bags for life may only be used a few times which means it is even more important to invest in educational programs for consumers on the environmental impacts of various formats including reusables.

It is vital that this government ambition does not have unintended consequences on existing recycling streams. Compostable materials need to be used in applications where it can be kept in a closed system particularly until food waste collection are implemented across all councils. Clear labelling is imperative for all plastics to prevent contamination of other recycling stream and would be needed for compostable material. If there is a danger of compostable material getting into the mechanical recycling stream, this can prevent some longer life end markets such as the construction industry from incorporating recycled plastic. Compostable materials should only be used in applications where there is a clear benefit in using them. Best fit applications for compostables include plant pots, liners for food caddies, coffee capsules, food service type items, and packaging that is highly contaminated by food and currently poses significant challenges to recycle economically; or in applications that prevent conventional plastics contaminating the composting stream such as fruit labels. As with all material changes, the use of compostable products should always be accompanied by lifecycle analysis to determine whether or not they are the best environmental choice.

As discussed in more detail in question 5 there needs to be investment in recycling infrastructure to ensure that the recyclable packaging is able to be recycled in practice. This includes advanced facilities to expand the range of plastics which can be recycled and ensure that circularity can be achieved. The government has the opportunity to be a leader in terms of infrastructure available in the UK and also waste legislation.

In summary, the BPF is confident that the target can be met as long as the efficient collection of all plastic packaging is implemented ASAP and the UK ensures measures are put in place to encourage much needed investment in sorting and recycling infrastructure.

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

The UK is currently too reliant on export markets for the recycling of its plastic waste. In 2020, 59% of plastic packaging was exported for recycling. In January 2021, the BPF released a Recycling Roadmap which sets out how plastic exports could be reduced by over a half and it no longer being a route for low quality material. This would result in a 3.5x increase in material remaining in the UK and being recycled domestically. To achieve the roadmap, a key requirement is investment in UK infrastructure and recognising that waste management infrastructure is critical. This includes both in mechanical recycling and in innovative developing technologies such as chemical recycling. There also needs to be no financial advantage for material to be exported rather than kept in the UK, which is currently the case with the PRN/PERN scheme. 16 other key requirements are set out which include consistent collections of all plastic packaging from all households and business, a legislative framework supporting domestic recycling and increasing the use of recycle wherever practical. End markets would need to be developed across all sectors rather than just a focus on packaging to ensure plastic recycling expands overall.

Keeping material within the UK would help ensure the traceability of material and ensure greater confidence that material collected is recycled. However, the Roadmap recognises some export is likely to still be needed for material which cannot be handled within the UK. In this case, robust procedures are required to ensure the material exported is recycled in all cases and meets the same

quality standards as a UK facility. There needs to be robust checks to ensure that exporters adhere to the national and international legislation on exports too. Furthermore, there needs to be clear definition of what recycling means.

It needs to be recognised that the dumping of material is waste crime and this needs to be tackled. There needs to be a sufficient deterrent in place to discourage criminals from undertaking this activity which affects the reputation of the whole industry. There would be a merit to considering suspending accreditation whilst investigations are in process and, if fraud is revealed, cancelling the accreditation for a meaningful length of time.

One area of concern is that material is moved from the original export destination to another country and then the outcome of the material is unknown. Exporters need to be to prove material has been recycled and where this took place to ensure this does not happen. Furthermore, there is a concern the material can be double counted with the current PRN system leading to inaccurate data.

The BPF is part of the Waste Compliance Taskforce (WACT) Export Waste Crime Working Group which is looking at how to address waste crime.

In summary, there needs to be investment in plastic waste management and recycling infrastructure within the UK to reduce our reliance on exports, whilst also ensuring there are sufficient deterrents to prevent waste crime and ensure all our exports are recycled to relevant standards.

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