

**Written submission by
Somerset Waste Partnership**

9th September 2021

EFRA Call for Evidence on plastic waste

1. About Somerset Waste Partnership.

- 1.1. Somerset Waste Partnership (SWP) was formed in 2007 and was the first county-wide area to bring together its waste services under a single joint committee. SWP is multi-award winning and known for innovation and its approach to partnership working. We were honoured to be the only Local Authority case study in the Resources and Waste Strategy.
- 1.2. SWP is submitting evidence to this call for evidence because whilst we welcome the ambitions of the Resources and Waste strategy, the Environment Bill and the subsequent consultations, with the focus on the 'polluter pays' principle, plastics, food waste and emphasis on collecting a consistent range of quality materials and recycling them in the UK, we feel that we can and should be going further to help reduce plastic pollution and tackle climate change.

2. 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?

- 2.1. SWP welcomes the current ban on single use items, and the proposal to extend this to plastic cutlery and plates. However, we feel that the current measures do not go far enough to tackle plastic pollution, and Government should as a minimum match the materials within the EU Single Use Plastic Directive and include bans on cups, food and beverage containers made from EPS, and all products made from oxo-degradable plastic.
- 2.2. There are other materials that we feel should also be targeted in future activity: single-use plastic sachets, wipes, nappies and sanitary products, cigarette ends and balloons. These items contribute to pollution on land and in the water and often contaminate recycling streams. They should as a minimum fall under the umbrella of EPR and producers should be responsible for adequate labelling, developing recycling facilities and covering costs of clearing up litter/treatment/disposal.
- 2.3. Keep Britain Tidy's litter composition report from March 2020 highlights materials that are most frequently littered. These include Cigarette stubs (66% by number, and significantly less likely to be put in a bin than other materials), chewing gum, sweet and confectionary wrappers, coffee cups, fast food and sandwich packaging. Many of these items are single use

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plastics, and though the proposed DRS scheme may reduce litter of drinks containers, it will not affect litter of the other items. EPR may result in some packaging design changes and material switches away from plastic, but it is also essential to accompany this with national behavioural change campaigns and ensuring that local councils have adequate funding to manage street scene and carry out enforcement where it is needed.

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

- 3.1. All resource use has an environmental footprint, and there is a need to mitigate the risk that wholesale switching from plastic to alternative materials could lead to unintended consequences and have other environmental impacts. In mitigating this risk, policymakers need to think and legislate holistically, rather than being guided solely by life-cycle analyses.
- 3.2. EPR systems must take these issues into account and modulated fees should be set appropriately to disincentivise packaging materials with poor environmental outcomes, whilst following the waste hierarchy, incentivising reusable packaging and increasing recyclability. Care should be taken to ensure that the system as a whole is considered to avoid material switching to materials with worse environmental outcomes to avoid taxes or charges.
- 3.3. SWP does not feel that 'alternative' plastics, including biodegradable and bio-based provide a genuine solution. We feel that oxo-degradable plastics should be banned. Such 'alternative' plastics do not address the problem of marine pollution or prevent littering and often contaminate the recycling streams. We also have concerns about the potential for large-scale changes in land use to grow plants to be used as packaging if consumption and over packaging is not addressed first.
- 3.4. Compostable packaging is often touted as a solution, yet compostable packaging does not break down if littered either on land or in the ocean. The Government's preference for AD to treat food waste, means that there is little incentive to develop IVC facilities that are suitable for treating compostable packaging. As AD is in many cases not suitable for treating compostable packaging, it becomes a contaminant along with other packaging and is removed for disposal. Compostable packaging is also a contaminant in recycling collections and can cause problems as it is often indistinguishable from plastic.
- 3.5. As a general set of principles any taxes, charges or bans should aim to reduce single-use items both at production and point of consumption, reduce the number of polymers on the market, encourage increased recycling rates and increased recycled content, prioritise actual recycling of items before down-cycling and focus on easy and cost-effective recycling in the UK. All these factors combined would have the effect of decreasing plastic pollution and incentivising and reviving domestic recycling infrastructure

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

- 4.1. SWP feels that if Consistency, EPR and DRS are introduced and work as intended, then there is no reason that the target for eliminating avoidable plastic waste should not be brought forward. This should ideally be no later than 2030-2035

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. SWP feels that with appropriate legislative and policy support, combined with the work that is currently ongoing by WRAP and other organisations, the ambition could be largely met. The EPR system needs to be well-designed and with modulated fees set at a level that strongly disincentivises using non-recyclable packaging, but also highlights the importance of reusable packaging.
- 5.2. It is also important to ensure that being 'recyclable' means that there is sufficient funding and infrastructure to ensure that it is actually recycled. Ideally this should be through mainstream kerbside collections, so LAs need to be fully funded to ensure this can take place.
- 5.3. There needs to be consistency on soft plastics between interim supermarket collections which are currently in development and medium-term ambitions to add this to kerbside collections. Without the consistency, there is a risk of consumer confusion and increased contamination.
- 5.4. In addition to increased investment, eliminating problem plastics that are expensive to process, and reducing single-use plastics overall, would reduce costs and increase recycling rates for the residual waste stream.

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. The UK Government should invest in UK sorting, treatment and reprocessing to ensure that we can manage our own materials. We recognise that whilst facilities develop there may be a need to export plastic waste. The ban on exporting to non-OECD countries should be introduced but steps should also be taken to prevent exports of waste to OECD countries that also may not have sufficient infrastructure to deal with it.
- 6.2. Investing in suitable sorting facilities will help to reduce the poorly sorted, contaminated waste that is most often managed unsustainably. The UK should not be exporting mixed waste, but clean, separated materials.
- 6.3. It is important to develop electronic waste tracking systems and also strengthen reporting requirements. SWP was the first to publish full details of what happens to all of the materials we collect for recycling through our End Use register (now known as [Recycling Tracker](#)). We first did this in 2007/8 and have continued to publish this information annually to ensure full transparency and confidence that our materials are actually recycled.

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- 6.4. Further to this, the Government needs to ensure that the Environment Agency have sufficient resource to spot check, investigate and carry out enforcement action to tackle those who illegally export waste.