

Call for Evidence – Plastic Waste Inquiry - Leicestershire County Council

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?

Leicestershire County Council (LCC) believe more emphasis needs to be placed on waste prevention, so materials (such as single use plastics) do not enter the waste stream in the first place. Following on from this, products that do enter the market should be designed and manufactured where possible to be reusable, thus extending their lifespan. If products are not reusable, then they should be designed to be recyclable and clearly labelled as such to enable citizens to recycle these items responsibly. This is as per the waste hierarchy as set out in the revised Waste Framework Directive (2008) and as per the Circular Economy Package. LCC recognise and support the move away from single use items of any material (where reasonably possible). There is concern around the amount of non-packaging plastic that is out there on the market such as toys, pens, sunglasses, cutlery, plates/bowls, CDs, plant pots etc, which cannot be recycled. At Household Waste and Recycling Centres across Leicestershire, we have struggled to find a legitimate recycling outlet for hard plastics such as chairs, toys and plant pots. Therefore, these items have to be disposed of as general waste as we cannot source reliable outlets with adequate duty of care documentary evidence on end use. The public perception is that they expect these items to be recycled, and where they are not this can lead to confusion.

Additionally, many single use plastics are used for the storage of food products in supermarkets and other retail outlets. It is often more difficult to buy loose edible products such as vegetables, meat, fish and bread and pricing often means it is more expensive to buy loose edible products. This should be addressed. LCC believes for food waste prevention, some plastic packaging can be necessary to extend the useability of that food product.

Many items may contain plastic but less obviously so, such as disposable nappies and many footwear and textile items. How are Government tackling this plastic waste?

LCC supports the extension of the plastic bag charge to all retailers and increasing the minimum 5p charge to 10p from April 2021 as well as the approach to place charges on other single-use plastic items, and the banning of some items. However, consideration must be given to any unintended consequences regarding charges on other single-use plastic items for e.g. those which may be consumed largely 'on the go' if there is not the appropriate infrastructure in place to support consumers to do the right thing when they come to discard these items.

Furthermore, simply concentrating on single-use plastic is unhelpful when the available alternatives are single-use other materials that are an equally poor use of resources and can often give rise to similar disposal issues, such as biodegradable and compostable plastics where there is a lack of infrastructure for treating them. Some alternative materials may also have a more detrimental effect on the environment for example regarding carbon impact.

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

Alternatives to plastic consumption ideally would be subject to a full life-cycle analysis to ensure the identified alternatives to plastic consumption are not more environmentally damaging than current processes.

LCC considers waste prevention through reuse targets should be further prioritised as implementing these from 2025 suggests a lack of urgency risking a lack of public momentum around waste prevention.

If reuse targets were introduced this would have a subsequent impact on the amount of material available for recycling and a need for updated targets. This all links up with the extend producer responsibility (EPR) and packaging. Another supporting measure could be the introduction of good design brand or mark which would indicate that a product or item has been suitably designed to facilitate reuse, minimise waste, carbon friendly and be recyclable.

To fully realise the Circular Economy, it is important that the option for reusable/refillable items is made available to all consumers, regardless of their income. Due to their limited market share, many of these items and services are currently comparatively expensive in terms of the upfront cost and are therefore beyond the reach of or not easily accessible (given limited availability) to residents on low incomes. This perpetuates the issues of inequality which the Government should look to address in its ambition to shift to a Circular Economy. LCC recommends that funding realised from EPR is used to re-invest in mechanisms which make reusable/refillable items and services affordable and accessible for everyone.

Furthermore, the durability and longevity of many plastic products make them particularly well-suited to reuse as long as sustainable and economically viable end-of-life disposal options for these plastics are available.

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

LCC would like to see avoidable plastic waste eliminated as soon as possible given that the UK Government has declared a climate emergency and the disposal of single use plastic waste can often lead to increased release of greenhouse gases

(thus contributing to rising global temperatures) as well as problems for marine animals and other wildlife.

A road map should be developed following analysis of differing product and market segments. This should then be broken down with earlier targets for elimination of plastic waste in segments where technical solutions already exist. This way early wins could be realised (e.g. as per straws and cotton buds) and research and development capability can be channelled to segments to facilitate delivery of the roadmap timescales.

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?

LCC would suspect that this is not on track as there are several issues to be addressed. Firstly, the legislative and governance framework to support ambition is still unclear. Industry is unlikely to act without clarity/certainty. Secondly, even if the Government achieves this ambition it will be a hollow one as many products or packaging items can be technically recyclable, but the recycling infrastructure is not there to support this recycling of these items. Film and black plastic items are examples of this. Lastly, there does not appear to be any analysis of the wider impact of measures to achieve this as more compostable items could adversely affect the ability to recycle non-compostable items (they become a contamination) or items are enhanced/changed to become easily reusable but then end up being used once and then disposed of or the changes made mean they may not now be able to be recycled. Many plastic items are reusable now but are not reused due to cost or perceived or existing regulatory barriers (e.g. around food hygiene/handling).

So, LCC do have concerns that even if this ambition is achieved it may not have the desired result of reducing our environmental impact.

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?

Recyclable material including plastics is an extremely valuable resource and a competitive marketplace operates worldwide. For materials exported outside the UK, LCC is legally required to report the last facility in the UK where the material was treated and LCC also reports final destinations where we have that information. The Resources and Waste Strategy makes reference to increasing the UK infrastructure, tackling waste crime, improved quality of plastics through the Basel and Stockholm conventions, creating a level playing field between accredited domestic reprocessors and exporters and tighter monitoring of waste exports.

As already stated above, the domestic market does not have sufficient capacity to process and support recycling of the existing material sold in the UK. There is also uncertainty as to the future volume of plastic that is likely to be produced and the

types of plastic that it may be. This creates an uncertain platform for investment by business in the UK. So, the answer to the question is 'yes' the UK Government will need to do more to ensure plastic waste is not exported and then managed unsustainably. Given the current reliance on export markets and uncertainties, it is difficult to see that this will change without specific regulatory intervention to ultimately support investment in developing UK plastic processing and recycling capacity.