

## Written evidence submitted by National Association of Waste Disposal Officers (PW0059)

### National Association of Waste Disposal Officers (NAWDO)

### Submission to the Environment, Food and Rural Affairs Committee

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#### Call for evidence

#### Plastic Waste Enquiry

Written evidence submitted by the National Association of Waste Disposal Officers (NAWDO). NAWDO is the primary network for senior waste managers within local authorities with statutory responsibilities for Waste Disposal. With over 80 members NAWDO membership represents around 80% of all local authorities with waste disposal duties and includes London Boroughs, Joint Waste Disposal Authorities, Waste Partnerships, Metropolitan, Unitary and County Councils from most UK regions (with the exception of Scotland).

#### 1. Executive Summary:

- 1.1 NAWDO is in support of the use of policies such as the incoming Plastics Tax and Extended Producer Responsibility (EPR) to drive reduced use of virgin material, reducing complexity and polymer type as well as ensuring greater fairness in the cost burden of dealing with these materials at the end of life. There are particular areas and material streams that need addressing and these include: Disposable/Single Use cups; commercial use of single use plastics; Research & Development and UK-based infrastructure.
- 1.2 We urge the Committee to ensure that the initiatives related to plastics and other Resources and Waste Strategy (RWS) changes are implemented in waste hierarchy order; that behaviour change, waste reduction and repair are considered first and are then woven throughout all the policies providing the core objectives that all other proposals refer back to. The overall carbon implications of policies should also be a significant driver during the decision-making process. Improving the quality and quantity of recycling and driving recycling out of the residual stream is then able to follow without risk of unintended consequences driving the wrong behaviour and further negative environmental consequences. Creating a coherent system of policies and legislation is critical to delivering an effective long-term resource management approach and truly circular economy for the UK.
- 1.3 Achieving targets and deadlines must not come at the cost of greater negative environmental impacts (including increased carbon emissions), material shifts to unknown and potentially problematic materials and the consumer being left behind in the journey to a more sustainable resource management approach.
- 1.4 Sufficient and long-term resourcing in funding and training across the sector, including regulatory bodies such as the EA and Local Authorities are key to success.

## **2. Introduction:**

2.1 As the primary network for local authorities with statutory responsibilities for waste disposal, the National Association of Waste Disposal Officers (NAWDO) welcomes the opportunity to respond to the EFRA Committee's call for evidence on plastic waste. We seek to ensure that Local Authority knowledge and experience form a key part of the Committee's deliberations on this topic.

## **3. 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?**

3.1 NAWDO is supportive of the Government's proposed Extended Producer Responsibility for Packaging (EPR) regime, that was consulted on recently as part of a suite of Stage II consultations under the Resources & Waste Strategy (RWS) and incoming Environment Bill. The introduction of modulated fees for packaging (including plastic) is sound; with more difficult to recycle material attracting higher fees for any material placed on the market. We also strongly support the proposed approach that producers are responsible for full net costs for dealing with these materials throughout their use, up to and including, treatment and disposal and would urge that continued focus is made on the introduction of EPR and associated policies and legislation as soon as is practically possible. In addition to this, greater focus must be given to moving material up the waste hierarchy in regards to prevention and reuse (and refill) ahead of recycling. Working with consumers to change behaviour to support this approach will also be critical and must be done alongside any policy and legislative changes; without public support and active engagement along with the necessary investment in these, these policies will fail.

It is our hope that EPR will drive down both the number and type of polymers on the market, including single use plastic and composites. However, we urge the Committee to consider the risks around material shifts and unintended consequences with products being moved from one type of less desirable packaging and into another which may be equally or harder to deal with (in terms of waste management) as well as carrying greater negative environmental impacts. This could include composites and compostable/biodegradable packaging alternatives, with more detail on the latter under Point 6 below.

3.2 We would also urge consideration on closed loop systems where this is both technically feasible as well as practicable (again with the overarching consideration of avoiding negative unintended consequences). HDPE and the milk industry is a prime example of where this approach works. Plastics, while a remarkably useful and versatile material that will likely have a continued role to play in society, are better driven up the waste hierarchy with reuse (including refill) first, followed by recycling over recovery and other forms of disposal.

3.3 Other policies, such as the proposed DRS and incoming Plastics Tax also have a role to play and NAWDO would, in line with our consultation responses, urge the Government to ensure that these policies, instruments and legislation work as part of a cohesive system to both improve waste

management systems in this country, while reducing its environmental (including carbon) impacts. Consideration also needs to be given to the fact that we have significant and mature infrastructure already in place; this infrastructure should not be rendered redundant as a result of ill-considered approaches. Regular reviews on the effectiveness of these policies must be built into the legislative programme and the work of the new Office for Environmental Protection (OEP). Any monies generated by fines, taxes, etc should be ringfenced to support the ongoing work around resource management such as R&D, systems, UK-based infrastructure, etc.

- 3.4 We would suggest that there are some specific material streams and areas that need addressing:
- A) Disposable/Single Use cups - while in scope for EPR as proposed in that consultation, NAWDO did question why these were not included within the scope of the proposed DRS where one of the stated objectives is to deliver litter reduction. We welcome the specific reference to this waste stream but believe that there is a risk of both undermining policy proposals (such as litter reduction) as well as a lost opportunity of moving this stream up the waste hierarchy to recycling over disposal, and ideally reuse over recycling. While the Government chose not to apply the proposed 25p per cup levy as suggested within the HMT call for evidence<sup>1</sup> in 2018; could a measure of this type not be reconsidered alongside other incoming policies to help drive consumer behaviour over reusable cups in preference for disposable? We are mindful however, of the impact that the COVID-19 pandemic will have had on this in recent months with a preference for single use over reusable for hygiene reasons.
  - B) Commercial use of single use plastics such as pallet wrapping and in other industrial and agricultural use – while indirectly referenced through both the EPR and ‘Business Waste’ in the Consistency consultations, as a specific material stream there is limited detail as to how these wastes should and could be dealt with in the future. As referenced under point A), there is opportunity here to move this material up the waste hierarchy while considering alternative materials and approaches.
  - C) Investment by Government in research and development into viable alternatives that do not create negative unintended consequences, including increased carbon or mal-adaptations. This R&D needs also to consider both increasing and improving the UK market in the longer term in terms of both producing and as well as treating these materials within the UK, without the need for export. Taxes raised via the incoming Plastics Tax in 2022 and from policies such as EPR and the proposed DRS could be used to support this. It’s worth noting here that plastic waste is generally high in volume and low in weight; local infrastructure to treat these material streams will play a key role in reducing haulage costs as well as other carbon impacts.
  - D) Referencing a point made previously in ensuring that any proposals and policies, etc are considered as part of a coherent system. An example where it appears this hasn’t been considered is the scope for targeted plastic film in the Consistency of Collections consultation; this is smaller than what is currently being offered by many supermarkets in their front of house

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<sup>1</sup> Summary of responses received to HMT Call for Evidence on ‘Tackling the Plastic Problem’ [Tackling the plastic problem: summary of responses to the call for evidence \(publishing.service.gov.uk\)](#) (Aug 2018)

recycling schemes. Inconsistent approaches such as this risks increased confusion, greater contamination and reduced value for money for consumers.

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

4.1 Standardised lifecycle assessments on proposed alternatives could be used to support this; with a focus on carbon and the waste hierarchy. The circular economy needs to be at the core of any work on alternative materials and their adoption.

4.2 Many alternatives that could be currently considered, such as cans for drinks as opposed to plastic bottles, bring with them significant issues such high energy demand and pollution in production and manufacturing (especially when virgin material is used). New materials will need to have been assessed and included within policies such as EPR to help ensure material shifts to avoid fees and costs do not take place.

4.3 Labelling such as that proposed under the RWS policies for EPR and DRS for example must be consistent and support informed choices by consumers while supporting the circular economy for these products, especially end of life.

4.4 As referenced under 3. above, the UK has in place mature and significant waste infrastructure. Any alternatives will need to consider how to make best use of this infrastructure in both a timely and cost-effective manner and without rendering it obsolete and useless in the short to medium term. We would also like to emphasise the point that alternative approaches and materials must be considered within the system of incoming policies and legislation to avoid both negative environmental shifts and cost impacts.

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

5.1 NAWDO would wish to understand the detailed definition of 'avoidable' in this context. The very brief definition within the 25 Year Environment Plan<sup>2</sup> describes it as 'what is technically, environmentally and economically practicable'. While there is a basis for a TEEP approach within the proposed Environment Bill policies (such as Consistency of Collections); this does not provide any detail as to how it might apply in relation to this specific target; it could include both single use and reusable plastic for example and what does 'practicable' mean when considering the 3 terms (T,E & E)? Unless viable alternatives that avoid negative unintended consequences are found, and ones that work with incoming policies it is difficult to either agree or disagree on the ambition of the target.

5.2 In line with our legislative responsibility, priority must be given to prevention and reuse ahead of recycling. The majority of the proposals contained within the EPR, DRS and Consistency consultations earlier this year focused on manufacture and recycling, as opposed to prevention and reuse. The Waste Prevention Plan for England consultation also lacked sufficient detail or ambition

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<sup>2</sup> Page 29, footnote 8 [25-year-environment-plan.pdf \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/674222/25-year-environment-plan.pdf)

to provide confidence that the top of the hierarchy is the priority – both for Government as well as for the work we all need to undertake to reduce the negative impacts of plastic (& other) waste.

**6. 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?**

- 6.1 This is an ambitious and very tight deadline, especially given the scale of the other changes coming in as a result of the RWS and Environment Bill policies (EPR, proposed DRS and Consistency of Collections). There needs to be a clear and coherent response between all proposals, and we would wish to understand in greater detail how the RWS proposals – with their different timelines to this target – and the UK's ability and capacity to sort these materials appropriately in terms of quality and type will work. Additionally, the UK must consider how this target will function within the global supply chains and movement of plastic (eg. filled toiletry containers).

Rushing towards an apparently arbitrary target of 2025 without due consideration and work around appropriate alternatives and additional systems to deal properly with the UK's waste risks undermining the very aim of the target; as well as the wider programme of work supporting it (such as the RWS policies and other targets such as net zero and biodiversity net gain). There is no doubt that the appetite for finding better and more suitable alternatives is strong, however we must avoid creating further and more significant issues in the future. Examples include bio-plastics, paper wine bottles and tin cans for water.

- 6.2 It is worth reiterating the point under 3 (C), that the UK does not have sufficient local i.e. UK-based treatment capacity to deal with the waste generated in this country. We would suggest that we have both an environmental and moral obligation to do this where possible, rather than sending our waste abroad to be treated.

- 6.3 In specific regards to compostable packaging, we would refer the Committee to the questions on this type of packaging that was asked in the EPR consultation over the Summer. It is worth noting responses that have been submitted regarding the proposal of applying modulated fees on this type of packaging material, and the risk of undesirable shifts away from this potentially environmentally beneficial product as a viable plastic alternative. If the modulated fees are too high, then this industry will likely be significantly adversely impacted.

However, currently there are limited standards for product performance in place, which then creates outputs that are not necessarily regarded as positive (eg. stories of shredded compostable bags that haven't broken down sufficiently and are visible in the end product, appearing as 'microplastics'). Should sufficiently robust standards be applied such as those ensuring that as a minimum these products are compostable in home composters for example, then this industry becomes a positive and viable alternative to plastic packaging where this is appropriate. There are additional conflicts that need addressing here; while compostable plastic can be difficult to deal with (see the example above), on the other side there is strong support from the industry to drive greater use of compostable bin liners for food waste bins. Product performance standards would help here; and

will need engagement with the wider sector (Environment Agency, REA, local authorities, etc) to deliver.

6.4 The Government has a key role to play in working with the Resources & Waste sector to avoid 'greenwashing' and to set minimum standards more generally. Collectively, the sector needs to work together to develop sufficient infrastructure to meet the needs of a growing population and Government has a key role to play in facilitating and enabling this.

**7. 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?**

7.1 Yes, there is more that the Government can do, and picking up on points made above not least amongst these is to work with the Resources & Waste sector to develop local (UK) infrastructure to deal with the waste generated in this country. Alongside this is the need to develop the necessary skills to work in a Circular Economy. Both these include planning, R&D, funding, training and a cohesive approach across departments to related policy and legislation.

7.2 The EPR consultation put forward proposals on waste tracking, both within and outside of the UK. These proposals need to be developed more fully and taken forward. Use of POM data and records for all types of waste (HH and commercial) will form part of the foundation for this. Enforcement is also likely to be needed to form a part of the Government's approach and links need to be made here with work on waste crime including fly-tipping and illegal exports of waste.

7.3 NAWDO would also wish to see a greater connection between product design and the waste hierarchy, building on the 'Right to Repair' law that came into force earlier this year. As noted above, Circular Economy is key to delivering successfully against our ambitions for the climate, biodiversity and economy.

7.4 Building on the point made in 6.4, regulations and standards for the management of plastics needs to be more robust, clearer and apply across borders – it is a global industry and issue. To support this, the Environment Agency (and the devolved counterparts) need long term funding and resourcing, and this is key.