

Consultation response
Reducing single use plastics

[Welsh Government Consultation Document Number: WG40193](#)

Question 1 - Do you support our proposal to ban each of the single use plastic items listed above? If not, please give reasons and where possible evidence to support this view.

Yes.

Question 2 - Do you agree the potential environmental and social benefits of our proposals will outweigh the potential impacts on people in Wales? Please give reasons and where possible evidence to support this view

Yes we agree that the potential environmental and social benefits of the proposals will outweigh the potential impacts on people in Wales.

Litter currently has an unseen and largely unnoticed cost. The Welsh Government have calculated that it costs around [£70 million](#) annually to clean up litter in Wales, a cost borne by tax payers. If anything, this is actually only a fraction of the true cost of litter in Wales. [Litter probably costs Wales around £440 million every year](#) according to the independent consultancy, Eunomia. 'This reflects the size of the 'welfare gain' that would be achieved under a zero litter situation.'

In an age of ever reducing central budgets, this cost is an unnecessary one that could be far better spent on vital local services such as social care, community facilities and other much needed local services and amenities.

Question 3 - Do you agree with our assessment of the potential benefits and impacts our proposals will have on businesses, including manufacturing, in Wales? Please give reasons and where possible evidence to support this view

Yes, we agree with the assessment of the potential benefits and impacts the proposals will have on businesses, including manufacturing, in Wales.

As we learn to cope with the effects of Covid-19 on our societies and economy, the importance of Wales embarking on a green and fair recovery is ever more important. The Welsh Government has a vital role to play in promoting and supporting alternative non single use products to come to market in Wales thereby ensuring that bans on these single use products can actually lead to new and

sustainable jobs being created in Wales. A joined up and well communicated strategy to this end would help the public understand the benefits of banning these items and replacing them with more sustainable Welsh produced products.

It is also important to understand that countries all around the world are moving in the same direction on single use plastics and that Wales would benefit from a 'first mover' standpoint if we develop businesses and products now that others will be demanding in the not too distant future.

Question 4 – Should oxo-degradable plastics be included on the list of items to be banned? Please provide evidence to support this view.

Yes absolutely.

[Oxo-degradable plastics](#) are now well understood to worsen the problem of plastic pollution. Research undertaken by the [University of Plymouth in 2019](#) found that oxo-degradable plastics remained intact in the sea and in soil for three years with bio degradable bags being found to be able to hold a full load of shopping three years after being discarded in the environment.

In the EU, restrictions prohibiting the placing on the market of oxo-degradable plastic are to come into force on 3 July 2021.

Question 5 – Do you believe the COVID-19 pandemic has resulted in changes to the market that are currently not accounted for in our research? Please give reasons and where possible evidence to support this view

It has been interesting (but not at all unexpected) to note that there has been a certain push back against action on plastics by the [plastics industry](#) during the last few months citing public health concerns over reusables.

[Studies](#) are ongoing on this issue and in June 2020, over 125 health experts from 19 countries signed [a statement](#) to assure retailers and consumers that reusables are safe during COVID-19. They were emphasising 'that disposable products are not inherently safer than reusables and that reusable systems can be utilized safely during the pandemic by employing basic hygiene.'

Question 6 – Do you agree with the exemptions we are proposing and how can we make them as clear and practicable as possible to apply? Please give reasons and where possible evidence to support this view.

Yes we agree with the proposed exemptions

Question 7 – Are there other exemptions we should consider in relation to all of the single use plastic items in our proposal? If so, please provide evidence to support this view.

Question 8 – Do you agree the proposed timescale for the implementation of the bans provides sufficient time for businesses of all types to adapt? Please give reasons and where possible evidence to support this view.

Yes, we agree with the proposed timetable

Question 9 - Do you agree with the proposed use of Civil Sanctions?

Yes, we agree with the proposed use of Civil Sanctions subject to regular reviews as to their effectiveness and with a commitment to changing the sanctions to more effective ones if the proposed ones are proven not to be effective.

Question 10 - Do you agree Local Authorities should enforce the bans?

Yes, we agree. It is important that Local Authorities do not suffer financially through any extra responsibilities however, so it is important that they receive financial help in order to provide the most effective service possible. We recommend the Welsh Government introduce a Latte Levy on single use cups in Wales and use some of this money to pay for other waste reduction and minimisation initiatives such as enforcing these bans.

Question 11 – Should wet wipes be included in future proposals for further bans or are there other measures which should be introduced to address them, for example Extended Producer Responsibility? Please give reasons and where possible evidence to support this view

We would support the banning of non-medical use wet wipes.

Wet wipes made up more than [90% of the material causing sewer blockages](#) that Water UK investigated in 2017.

[Surprisingly](#), surgical and medical use wet wipes make up only 3% of annual wet wipe or ‘nonwoven’ use in Europe whereas wipes for “hygiene and personal care” account for around 44% of all nonwoven use.

There is an argument for a move to ‘flushable’ wet wipes although flushable though doesn’t mean eco-friendly. Making wet wipe material more “dispersible” is not the same as environmentally friendly. It just means any plastics or other synthetics in the material break apart more easily into smaller pieces. The bigger pieces can become a choking hazard to wildlife and visible pollution in the natural environment. As they break down, further tiny particles of plastic are spread into our waterways and oceans.

Question 12 – Are there any other items that should be included in any future proposals to tackle single use plastics? Please give reasons and where possible evidence to support this view.

We would suggest the following items are also considered:

Single portion sachets and pots – single use packaging for ready-to-consume condiments, mini pots etc. We would also like to see this extended to small [plastic toiletry bottles](#) in the hospitality sector.

In their '[Options for Extended Producer Responsibility in Wales](#)' report for the Welsh Government in April 2018, Eunomia identified single portion sachets and pots as an area the Welsh Government could take action.

Eunomia state that:

'It is estimated that 72 million single serve sachets are placed on the market each year in Wales.

- This results in around 72 tonnes of waste, of which around 71 tonnes are estimated to be captured directly within the residual waste stream and around 1 tonne is believed to be littered on the ground and then picked up by local authorities. This equates to 0.0025% of Welsh municipal waste arisings.
- Given an average weight of 1 gram per empty sachet, 1 tonne of littered sachets would equate to 1 million items.
- Alternatives exist in the form of reusable dispensers or bottles for ketchup, mayonnaise etc.'

and

'Due to their small size and large surface area relative to their volume, they tend to be a highly contaminated (including through remnants of the product they contained) and dispersed waste stream, which would be expensive to separately collect, sort, and wash, even if technically recyclable. They can also lead to contamination of separate food waste when incorrectly disposed of – a problem that is sometimes exacerbated by the design of such items, with tearable strips, seals and caps that become separated from the main body of the packaging, which makes them difficult to detect and separate from food waste. Finally, even when they are disposed of and collected correctly, they pose problems for sorting technology as they often slip through trommel screens, or are too small and contaminated to be detected.'

Given there are obvious alternatives and that these [sachets](#) and pots don't conform to existing waste hierarchy regulations in Wales, we believe this is another area that the Welsh Government can take action using existing powers under the Waste (England and Wales) Regulations 2011.

Mesh produce nets

The [plastic mesh](#) nets that oranges, lemons and onions for example are sold in are totally unnecessary and typically non-recyclable.

We would like to see the Welsh Government take action on these in Wales.

Pre-packed sandwich boxes

In the UK, we apparently buy [6million pre-packed sandwich boxes a day](#). Most of them have a plastic lining bonded to the cardboard, which similarly to single use cups, renders them [very difficult to recycle](#).

Again, we would like to see the Welsh Government take action on these in Wales especially in on-site eating establishments where the waste hierarchy regulations are relevant and the Welsh Government can take action using existing powers under the Waste (England and Wales) Regulations 2011.

Single use plastic bags

It is encouraging that the Welsh Government is seeking to take further action on single use plastic bags in Wales. We support this further action and recommend that existing exemptions to the plastic bag charge are reviewed so that anomalies such as certain [pharmacies](#) still giving out millions of single use bags are addressed.

Cigarette butts

These are the most commonly littered item in Wales and around the world. [ASH Cymru](#) estimates that 'across the UK alone 122 tonnes of smoking related litter is dropped every day' and 'in 2018, cigarette butts were found on 80.3 % of streets in Wales'.

These butts contain [plastic filters](#) and can persist in the environment for years.

They also contain a cocktail of [chemicals](#) which leach out into soil and water courses.

We would support [First Minister Mark Drakeford's proposal](#) to ban smoking in town and city centres as one way to reduce the amount of cigarette litter on our streets and in our environment. We would also support tobacco firms being subject to new EPR regulations for their products in Wales in future.

Sporting and other events in Wales

Pre-Covid-19 there were many sporting (and other) events in Wales such as the Cardiff Half Marathon where plastic bottles of water were given out at refreshment stations along the route. Whilst these don't constitute a large percentage of overall plastic use or litter creation, the effects of these are felt locally in the aftermath of events, cost money to clean up and are a wasted opportunity to encourage behaviour change amongst people in Wales. There are alternatives and once these events resume in Wales, they should be, as far as possible, plastic free, sustainable and carbon neutral.

We would also like to see action on single use plastic 'goody bags' given out at events, often containing other single use plastic items. These are unnecessary, use valuable resources and are often to be found littered afterwards.

15. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

The welcome move to ban these single use plastic items and the desire to introduce measures such as a deposit return scheme, extended producer responsibility and a latte levy will inevitably reduce the amount of 'waste' being sent for incineration in Wales. Allowing increased incineration (or 'energy from waste' as it has been rebranded) capacity in Wales now is therefore a contradictory policy especially given the long term contracts demanded by incinerator companies.

We urge the Welsh Government not to approve any new incinerators/ energy from waste facilities in Wales and to put in place a timetable to phase out existing plants.

We would also like to take this opportunity to again urge the Welsh Government to bring forward the proposed target date for zero waste in Wales from 2050 to 2030 to bring it in line with current climate science.