

Consultation on proposals to ban the distribution and/ or sale of plastic straws, plastic-stemmed cotton buds and plastic drink stirrers in England: LEDNet response

Introduction

The London Environment Directors' Network (LEDNet) welcomes this opportunity to respond to this consultation. LEDNet is the membership association for London's Environment Directors and provides a forum for collaboration and policy development on key environmental issues.

Waste management is a core concern for LEDNet members, who together manage 5.5 million tonnes of waste every year, including over 2 million tonnes of reused, recycling or composted material.¹ This comprises 20% of England's total waste, and just under 20% of England's total recycling.²

Overall, we welcome the proposals in this consultation, which have the potential to reduce waste and promote greater awareness of the negative impact that incorrectly disposed of waste – including plastics – can have. However, we note that these proposals only cover a proportion of the single use plastic items within the scope of the proposed EU Directive on single use plastics³, and we urge Defra to take action on these additional items once the Directive is adopted, even if this is after the UK's exit from the EU. We believe that this would be in line with the much wider, deeper ambition we expect from the forthcoming Waste and Resources Strategy.

Responses

Plastic straws

Q1 – 5: *factual details (name, organisation etc.)*

Q6: Do you support the proposal to introduce a ban on the distribution and/or sale of plastic drinking straws in England? (Yes/ No)

Yes. LEDNet supports a ban on their distribution and sale, because it will reduce residual waste and litter, and support action on climate change by reducing the use of a fossil fuel-based product

Q7: Do you agree with our proposed date for the ban (October 2019)? (Yes / No. If no please

¹ Defra, 2017, 'Local Authority Collected Waste Statistics - Local Authority data', <https://www.gov.uk/government/statistical-data-sets/env18-local-authority-collected-waste-annual-results-tables>.

² Ibid.

³ Directive on the reduction of certain plastic products in the environment

explain why.)

Yes, we support the proposed October 2019 introduction of the ban

Q8: Do you support a ban on beverage carton straws? (Yes/ No. Please give reasons).

Yes, support the extension of the ban to beverage carton straws, for the same reasons, and we also support the proposed October 2019 introduction of this ban.

Q9: *No answer*

Q10: If pursuing a broader ban including the sales of straws, do you agree with the proposal to exempt plastic straws for medical-enabling and other specialist uses from any ban? (Yes/ No. Please give reasons).

Yes, we agree with the proposal to exempt plastic straws for medical-enabling and other specialist uses from any ban. However, we believe that efforts should still be made to ensure that at end of life of these products are recycled.

Q11 – 16: *No answer*

Q17: Do you agree that the ban should cover all compostable and biodegradable plastic (such as PLA)? (Yes/ No. Please give reasons).

Yes, we agree that the ban should cover all compostable and biodegradable plastic (such as PLA). There is poor public understanding of the difference between bioplastics and biodegradable plastics, and they may not look any different to other types of plastic, which leads to increased contamination in both food waste and dry recycling streams. For example, biodegradable plastics can only be composted, depending on the circumstances, and cannot currently be separated for treatment as a defined stream at Materials Recycling Facilities. Bioplastics can also drive intensive farming of crops, increasing greenhouse gas emissions and groundwater and soil pollution from chemical inputs. Biodegradable plastics are not desirable, because: they do not break down in a standard wet anaerobic digestion process; they produce methane (a powerful greenhouse gas) when they break down; they can be too slow to break down; and if only some parts of the product break down, they can contribute to microplastic pollution, which is arguably harder to solve than macroplastic pollution.

Furthermore, from a waste hierarchy perspective, substituting compostable bioplastics for single use recyclable plastic doesn't move this waste stream up the waste hierarchy, it simply changes the processing route. If Government wants to take decisive action on single use plastics, including reducing litter, it would be much better to encourage a move away from single use and throwaway materials, and instead to encourage a much greater use of reusable products and the minimisation of plastic waste, including packaging, as an alternative to single use products. This can only be achieved through a range of measures including legislation, financial drivers and behaviour change communications to normalise the use of reusable alternatives.

Q18 - 20: *No answer*

Q21: Our proposals for enforcement are that the ban will be enforced through civil sanctions set out in Part 3 of the Regulatory Enforcement and Sanctions Act 2008:

- How should compliance with the ban be monitored?
- Who should enforce the ban? (for example, Local Authorities, Trading Standards or Office for Product Safety and Standards)

We believe that local authorities are best placed to enforce the ban. However, this must not create a new burden on local authorities, and their already-stretched regulatory services departments. Government must carefully consider what level of monitoring and enforcement will be required to secure the benefits of the ban, and ensure that authorities are funded to deliver these additional responsibilities. We propose that Government should consider a form of compliance confirmation responsibility on businesses, to reduce any burden on government.

Q22 – 28: *No answer*

Buds

Q29: *factual details (name, organisation etc.)*

Q30: Do you support the proposal to introduce a ban on the distribution and/or sale of plastic stemmed cotton buds in England? (Yes/ No. Please give reasons).

Yes, LEDNet support a ban on their distribution and sale, because it will reduce residual waste and litter, and support action on climate change by reducing the use of a fossil fuel-based product.

Q31: Do you agree with our proposed date for the ban (October 2019)? (Yes/ No. Please give reasons).

Yes, we support the proposed October 2019 introduction of the ban.

Q32: Do you agree that the ban should cover all compostable and biodegradable plastic (such as PLA)? (Yes/ No. Please give reasons).

Yes - see answer to question 17.

Q33 – 36: *No answer*

Q37: Our proposals for enforcement are that the ban will be enforced through civil sanctions set out in Part 3 of the Regulatory Enforcement and Sanctions Act 2008:

- How should compliance with the ban be monitored?
- Who should enforce the ban? (for example, Local Authorities, Trading Standards or Office for Product Safety and Standards)

See answer to question 21.

Q38: Is there anything else you would like to tell us relating to the proposed ban on the distribution and/or sale of plastic stemmed cotton buds?

No answer

Stirrers

Q39: *factual details (organisation)*

Q40: Do you support the proposal to introduce a ban on the distribution and/or sale of plastic drink stirrers in England? (Yes/ No. Please give reasons).

Yes, LEDNet support a ban on their distribution and sale, because it will reduce residual waste and litter, and support action on climate change by reducing the use of a fossil fuel-based product

Q41: Do you agree with our proposed date for the ban (October 2019)? (Yes/ No. Please give

reasons).

Yes, we support the proposed October 2019 introduction of the ban

Q42: Do you agree that the ban should cover all compostable and biodegradable plastic (such as PLA)? (Yes/ No. Please give reasons).

See answer to question 17.

Q43 – 44: *No answer*

Q45: Our proposals for enforcement are that the ban will be enforced through civil sanctions set out in Part 3 of the Regulatory Enforcement and Sanctions Act 2008:

- How should compliance with the ban be monitored?
- Who should enforce the ban? (for example, Local Authorities, Trading Standards or Office for Product Safety and Standards)

See answer to question 21.

Q46: Is there anything else you would like to tell us relating to the proposed ban on the distribution and/or sale of plastic drink stirrers?

No answer