

## Call for evidence on commonly littered and problematic plastic items

### Response from the Advisory Committee on Packaging

February 12<sup>th</sup> 2022

#### Wet Wipes

1. Would you support a ban on wet wipes containing plastic? You will be asked about possible exemptions in the following questions.

- Yes
- No
- Don't know

Please give reasons and supporting evidence

We support a ban only if human health or safety is being compromised or if environmental or other damage is relatively large with no mitigation in the short-term. We support allowing industry to reduce environmental or other damage under strict monitoring and control, and -- only if response over some time has been poor -- moving to greater regulation like bans. For convenience we call these mechanisms Extended Producer Responsibility (EPR).

The evidence on "fatbergs" and sewer blockages being caused primarily by wet wipes is not clear-cut. Many wet wipes meet an industry approved flushability standard or Water UK's standard. Industry should be mandated to work to commonly agreed standards and have monitoring mechanisms imposed. If direct environmental cost can be quantified that should be passed on to concerned producers and retailers so that it is paid for by so-called polluters or their consumers.

A ban on one material typically would result in consumer and industry costs and inconvenience and shifts to alternative materials with possibly similar results as now.

2. In the case of a ban on wet wipes containing plastic, would you support there being some exemptions for wipes used for medical purposes? Medical uses of wet wipes include patient care, spill absorption, and to clean equipment and surfaces. You will be asked about additional exemptions in the next question.

- Yes
- No
- Don't know

Please give reasons and supporting evidence

Should a ban apply, we would support exemptions for wet wipes used for patient care in a wide range of locations and applications; not solely hospitals but also in nursing homes, social care settings, medical practices and homes where personal hygiene is radically improved by these, eg, when householders have incontinence. It is possible that the volume of such exemptions is so large as to make a ban outside exempt areas be meaningless.

3. As well as wipes used for medical purposes, are you aware of any uses or situations in which the use of wet wipes containing plastic is essential and could be considered for any exemptions in future legislation?

- Yes

- No

Please give reasons and provide supporting evidence.

Please see 2.

4. Are you aware of the water industry's Fine to Flush standard?

- Yes

- No

5. If you answered yes to question 4, do you think the current water industry 'Fine-to-Flush' standard is effective in reducing sewer blockages caused by wet wipes?

- Yes

- No

- Don't know

Please give reasons and supporting evidence

We believe that much greater emphasis should be placed on citizen education to promote understanding of 'fine to flush'.

6. Do you support a mandatory 'flushability' standard for wet wipe products placed on the market to indicate more clearly which wipe products are truly flushable?

- YES

- No

See answer to Q5 above

7. Do you support mandatory labelling on packaging about disposal and the impact of wet wipe products on the environment?

- a. Yes

- b. No

- c. Don't know

Please give reasons and supporting evidence

We believe labelling should be much bolder on outer packaging.

8. Would you support an extended producer responsibility scheme for wipes containing plastic? If so, how might this operate?

- Yes

- No

- Don't know

Please provide suggestions for how this might operate.

All manufacturers of wet wipes should agree a per unit charge to add on (say, 25p) and put into a monitored fund which they should use for consumer information, litter reduction, recycling and product development. Charity rules could apply.

9. What alternatives are there to single-use plastic wet wipes, including wipes made from non-plastic materials? We would welcome evidence on the cost of these alternatives, their environmental impact and any issues that could be caused by increased use of them.

- Yes
- No
- Don't know

Please give supporting evidence on the cost and environmental impact.

Not enough is known about viable alternatives. Industry should be charged with developing more flushable or environmentally-friendly alternatives along with EPR.

### **Tobacco Filters**

10. Do you support the government taking regulatory action to tackle littering of tobacco filters?

- a. Yes

Please give reasons and supporting evidence.

We support mandating a monitored EPR scheme whereby cigarette manufacturers and retailers (and others who are main components of litter) collect, reduce and recycle litter. This could include consumer education, consumer facilitation with portable ash-collecting receptacles, responsibility for geographically marked areas sensitive to litter, and evidence of reduction and recycling.

11. If the government takes forward an extended producer responsibility (EPR) scheme to tackle cigarette littering, which of the following costs related to managing littered tobacco filters, if any, do you think should be covered by producers?

- X a. campaigns aimed at promoting responsible disposal
- X b. provision of bins and management of binned filters
- X c. clearing up ground litter and subsequent treatment
- X d. data gathering and reporting

e. none

f. Other, please specify

Please give reasons and supporting evidence.

As already stated, any EPR scheme should be part of an EPR scheme covering all materials, not just tobacco filters. Some success has already been achieved through industry EPR schemes for tyres, silage wrap and coffee cups.

12. Are there other regulatory approaches that government should consider?

Please give reasons and supporting evidence.

An alternative to a full EPR scheme as above is to replicate the grocery bag charge, ie, have retailers collect extra money per unit and use that money for litter collection, recycling and consumer information in geographically delineated areas.

### **Single-use plastic sachets**

17. What environmental impacts do single-use plastic sachets have? What is the evidence in support of your view?

We have concerns that the definition of 'single-use plastic sachets' in your call for evidence is unclear and open to misinterpretation. Much clearer product specifications including sizes and

applications are required before any answers can be provided to this question.

The first step has to be to establish reliable volumes of use from each category, cosmetics and foodservice. We believe present volumes are too small to cause significant environment impacts. On the other hand there are important niche uses, eg, sampling cosmetics, making cheap meals tastier, avoiding waste and obesity.

18. Are you aware of any alternatives to single-use plastic sachets?  
Do you have any evidence to support that these alternatives are more environmentally friendly than single-use plastic sachets?

As stated in Q17 clearer definitions of product and use are required before further comment. Subject to that foodservice outlets could be mandated into an EPR scheme so that they reduce sachet use indoors through using larger recyclable packages and are responsible for collecting litter, disposal, recycling and consumer education based on a small charge, say 5p, per unit.

19. Do you support consulting on introducing a ban of single-use plastic sachets used for:

- a. Food and drink: permanent food outlets including restaurants and cafes, and sachets provided with ready meals
- b. Food and drink: mobile outlets including trains, airplanes, food trucks
- c. Beauty industry: providing free samples at the point of sale or single-use quantities provided within a multipack
- d. Support all of the above
- e. Do not support any of the above**
- f. Please give any evidence to support your views

We do not support a ban. We refer you to our advice document to Defra in August 2021. We support a mandated industry led EPR scheme over a defined time period and only if that is unsuccessful further stricter regulation.

20. Do you support consulting on introducing a charge on single-use plastic sachets used for:

- a. Food and drink: stationary outlets including restaurants and cafes
- b. Food and drink: mobile outlets including trains, airplanes, mobile food vendors
- c. Beauty industry: providing free samples at the point of sale
- d. Support all of the above**
- e. Do not support any of the above

Please give any evidence to support your views

The grocery bag charge is an excellent example of nudging positive behaviour. A 5p charge resulted in major reductions and replacement by recyclables.

21. Are you aware of any other uses of single-use plastic sachets that could be considered for banning or introducing a charge on?

We would urge DEFRA to accelerate proposals for an EPR scheme for all packaging materials, rather than trying to focus on small sections of the overall packaging market. Plastic litter is mainly PET soft drink and water bottles, eg, and mandating those producers and retailers to an EPR scheme will have much more significant results.

22. Are you aware of any uses or situations in which the use of sachets is essential and could be considered for exemptions in any future legislation? What is the evidence in support of your view?

Without knowing the definition/specifications detailing exactly what DEFRA mean by 'sachets' it is not possible to answer this question. Banning can have negative effects such as waste or obesity. Imagine replacing ketchup sachets on aeroplanes by larger packaging or making cheap meals for manual workers unaffordable or just disrupting the luxury fragrances market dependent on small sachets.

### **Single-use cups**

23. Would you support the government consulting on a proposal to introduce a charge for single-use cups?

- Yes
- **No**
- Don't know

Please give reasons and supporting evidence.

The revision to the Packaging Waste Directive in the form of an all-encompassing EPR regulation should direct funding to promote the collection and recycling of single-use cups and reduce littering. Current DEFRA estimates for the likely cost of EPR at £2.7 billion pa would suggest there will be adequate scope for the establishment of take-back schemes and recycling initiatives for all single-use cups. With EPR projected to become operational in 2023/24 we fail to understand why any additional measures are being considered. If EPR was to be delayed we would support adding a charge to single-use cups in a local EPR so that litter is reduced, collected and recycled and consumer habits influenced positively.

24. Do you think this charge should be for both hot and cold drinks?

- Yes
- **No**
- Don't know

Please see response to question 23. Cold drinks should be excluded as single-use cups are typically used for drinking water.

25. Do you think this charge should apply to businesses of all sizes?

- Yes
- **No**
- Don't know

Please see response to question 23.

26. Are you aware of any situations where the use of a single-use cup is essential and could be considered for exemptions from the charge in the future? E.g., because of business location, business type, type of product in the cup.

Please give reasons and supporting evidence.

It is assumed EPR will cover all business sectors, in the same way the PWR obligate all businesses over the minimum threshold, thus the need for exemptions becomes superfluous.

### **Re-use and refill**

26. What are the barriers to reuse and how could they be addressed? Please provide any supporting evidence.

Retailers and manufacturers understand the importance of establishing options for citizens

to purchase products without packaging. Not all consumers will want to take up this option, however. It is recognised some will and investigative work is already being undertaken to examine how UK retail outlets can be modified to incorporate reusable and refillable retail options. Retailers and brands agree that a reduction in the use of single-use packaging through reusables is a vital part of the future provision of food.

Signatories to the WRAP Plastic Pact and the Cortauld Commitment 2030 are also working on this topic. However, it is important to stress that there is still a great deal of work to be done to determine how to overcome the many barriers which currently exist before a more comprehensive roll-out for this new shopping concept can be introduced.

We recognise and welcome the investigative work already being undertaken by UK retailers, brand holders and suppliers. However, we stress to DEFRA that this work is best left to Industry and is not for government intervention. Industry recognises the importance of this issue, any additional legislation or regulation in this area would be most unhelpful.

Today various reuse solutions for pre-fill and dispensing options are being explored with various levels of success. However, until this preparatory work is complete, scaling up across the UK grocery retail sectors is not a realistic proposition. Wet and dry products need to be treated differently with different reuse solutions for each product group. Frequency of purchase together with speed of consumption will require different solutions.

The current highly optimised global supply chains will need converting to a circular design. This will inevitably be more complicated and care must be taken to ensure wastage levels do not increase.

It is difficult to change people's established habits in their approach to shopping. Whilst a small number of consumers say they want to use this format of retailing, to scale the numbers up will require a great deal of citizen education since many issues remain, eg,

- \*Consumers do make impulse purchases and without containers brought from home they run the risk of purchasing another reusable container (if available) or not using this option.

- \*Hygiene considerations particularly around fresh food and drinks are a concern alongside food safety liability.

- \*Difficulty exists in incorporating key nutritional, allergen, and dietary information, which is presently displayed on packaging, together with other information on safe food preparation and use.

- \*Loss of brand identity and associated quality assurance are possible.

- \*Cost to the consumer of purchasing reusable containers could also be significant.

Reuse models are not practical for all retailers due to size constraints and therefore will not be accessible in all locations to all consumers. For example, inner cities have numerous smaller retail outlets, and reuse/refill models are only suitable to hypermarkets and supermarkets usually located outside of city centres.

With these barriers in mind, reuse models are more suitable for some applications such as dried goods, certain beverages, and some household cleaning products. Barriers can be overcome with consumer education campaigns and enhanced data capture on these models.

Reversing the EPR principle we would encourage government to think of encouraging through subsidies such as VAT or rates reduction on specified products and areas.

27. What are the barriers to refill and how could they be addressed? Please provide any supporting evidence.

Please see 26.

28. How can government incentivise increased reuse and refill?

See answers above, in addition:

We support using more refillable applications where appropriate. However the recyclability of reusable containers does also need to be considered so they are not destined for disposal at end-of-life. The adoption of refill models should be based on a full life cycle analysis to ensure there are no adverse outcomes. Refill models have a driver of potentially minimising packaging size and weight which leads to increased resource efficiency. The barriers are fewer with a reusable model of delivery at home as brand identity and loyalty are easier to retain.

Until the many questions above are answered we do not consider there is a role for additional Government intervention.

29. How could businesses incentivise customers to support reuse and refill?

This will be an issue for the retailers and brand holders to address. However, it is reasonable to assume with the significant costs that will be incurred during the introductory phases, businesses will embrace educating and incentivising customers if positive incentives are given.

30. Please provide information about any successful case studies of reuse and refill.

As already stated, the WRAP Plastic pact have been working with brands and retailers to conduct trials on reuse and refill models in supermarkets.

31. Would you support the government consulting on regulating that restaurants cannot provide customers with any single-use products in eat-in settings? The existing exemption for straws would remain.

Yes

• No

We suggest instead adding a small charge which can be used as EPR for designated purpose.

Using bans of the type suggested is not practical. Switching from one material to another does not reduce littering or improve recycling, especially as the alternatives may be more difficult to recycle.

We would urge Defra to continue to develop and fully implement the packaging Extended Producer Responsibility (EPR) proposals, rather than targeting specific types of product or packaging. We believe that a holistic and comprehensive policy approach is required for the management of packaging waste across the industry and across the UK.

We also believe that packaging EPR will be more effective in ensuring that packaging materials are collected for recycling. There needs to be a focus on increasing recycling and ensuring the UK has the infrastructure to handle more of its waste itself.

We would urge Defra to implement packaging EPR in line with the rest of the UK and to apportion part of the revenue to on-the-go, material segregation, on the go recycling bins to tackle littering, as well as to improve the enforcement of anti-littering measures.