

Response to the Scottish Government's consultation on Charging for single-use disposable beverage cups

14 November 2024

1. We agree with your rationale for action – single-use disposable beverage cups are increasing in number and are an increasing part of litter or non-recyclable waste. In addition, we believe the consuming public are relatively unaware of the waste and environmental consequences of single-use cups and charging makes them and other participants like retailers collaborators in reducing waste. We also agree that recyclable materials should be treated the same way as non-recyclable, because distinguishing is very difficult in practice and single-use of such small items must be discouraged for more effective resource use.
2. However, single-use cups made of paper are easily recyclable as per Valpak's National Cup Takeback Scheme (with coffee-shops and the like) provided they are separately collected, they are largely free from contaminants such as plastic lids, food and other waste or liquids inside the cups and the collection facilities are convenient for consumers and the message is highlighted to them.
3. As you know the 4 UK governments agreed to establish a UK-wide Cup Takeback Scheme as part of Extended Producer Responsibility but the regulations have excluded this. We believe such a national scheme can be launched in all 4 UK government areas and a co-ordinated scheme for the UK gives manufacturers and retailers the benefit of planning with UK-wide scale and consequently lower costs to consumers.
4. We agree charging is the most efficient way of producing the desired results as the success of the single-use grocery bag has been.
5. Our responses to your main questions are as follows:

(i) Charge minimum 25p per cup: This appears reasonable just now when a branded coffee shop appears to charge about £2.50 to £3.00 per drink. While we support this as a practical introduction, inflation or changed business practices could make it less relevant. We suggest up to 10% of final retail price of a single drink, providing the minimum is 25p. Having a percentage also makes the consumer and retailer see that more expensive or larger-volume beverages cost more for single-use packaging.

(ii) No charge if the drink is free (eg, in non-retail settings like hospitals and care homes): We do not support this in principle. This encourages negative practice and the need for regulators or enforcers to check in settings which could be very large in number while using very small quantities. While hospitals and care homes give the feeling of caring environments and needing support, we

recommend a single, consistent message for effect and for such settings to then seek separate support (if someone cannot afford it and find an alternative go to their sponsor for subsidy). Alternatively, since hygiene issues are critical in hospitals and care/nursing homes, only in these settings, we recommend allowing free single-cup use providing they administer a cup takeback scheme and contract with a specified collector so that those cups are recycled or disposed of properly.

(iii) Exemptions for settings such as schools and vending machines: We do not support this. This encourages negative practice and the need for regulation which is impractical as explained in the previous point. Vending machine retailers or brands should be liable for the charge and can easily accommodate it in their prices; consumers also understand why vending machines charge a bit more because they are getting convenience rather than needing to go to a retailer. Schools and other settings should not be exempt as per the rationale in the previous point. Schools in particular are an extremely important location to get the appropriate message to young people when messages stick for life.

(iv) Retailers should be able to get an implementation charge: This is sensible but instead of leaving it undefined which can lead to negative practice or disputes the government should set it at maximum, for example 20% of the cup charge, ie, 5p if the cup is 25p. Simple and practical administration has to be part of any policy and retailers and brands would accept this as reasonable.

(v) Net proceeds to be used for environmental purposes: We support this aim but suggest that the government lets retailers and others collecting the charge to spend the money collected on local and verifiable environmental activities. By doing this, as in the grocery bag charge, retailers have a vested interest in the charge being a success and local communities gain by co-operating. We recommend a share of the proceeds is used for a single-use cup takeback scheme on the lines of the National Cup Takeback Scheme mentioned above.

We would be happy to discuss this with you.

Advisory Committee on Packaging