

Question 1

We do not think that the following products should be included in any ban:

single-use plastic expanded polystyrene beverage cups;
single-use expanded polystyrene beverage containers;
single-use plastic expanded polystyrene food containers;
single-use plastic cutlery;
single-use plastic plates (including trays and platters).

Please see our rationale recommending an alternative approach in answer 3 (below).

However, we consider a ban to be appropriate for the following:

single-use plastic beverage stirrers;
single-use plastic straws;
single-use plastic balloon sticks;
all oxo-degradable products.

Question 2

We support the proposals for exemptions for plastic and single-use plastic items used in medicines/medical care. We suggest the scope for exemptions is increased to include straws supplied under direction by health professionals for medical purposes.

Question 3

While we welcome initiatives which seek to improve the environment through a reduction of wastage and littering, and greater levels of used packaging collection and recycling, we believe that an outright ban on certain plastic packaging items is not always the best approach. Banning, or prohibiting the use of certain single-use plastics, can lead to unintended consequences whereby product substitution leads to greater energy and raw material usage together with a higher carbon footprint. Also, plastic containers are often the best option for dispensing single portion food or beverage products; a ban on these plastic products would again lead to product substitution resulting in higher volumes of food wastage and reduced consumer choice and quality. Single-use packages can contribute to reducing obesity and better health.

As an alternative to a ban on the items detailed in our response to question 1, we believe a better option will be for industry to take responsibility for single-use plastic packaging products placed on the market to ensure used packaging is collected and recycled. This would be achieved via an industry-led Extended Producer Responsibility scheme. All stakeholders in the sector could agree a voluntary scheme, financed by a levy on single-use plastics, which would facilitate the collection and recycling of used plastic packaging. The scheme could be administered and managed by a not-for-profit organisation with the relevant experience such as RECOUP. In agreement with the Scottish Government and stakeholders, the scheme administrator would set targets for the achievement of minimum recovery and recycling rates. Failure to achieve the target recovery rates within specified timescales could then lead to an outright product ban. Over time such an approach should lead to increased recycling and development of more environment-friendly substitutes.

Lastly, if the Scottish Government remain minded to introduce an outright ban (which we very much hope will not happen until serious consideration is given to an alternative scheme) we recommend that industry is given the maximum amount of time to prepare for the implementation of the new regulations. Certainly a 12-month implementation period, to ensure that stocks of materials are used and alternatives are available for consumer benefit, should be included in any regulation.