Consultation Questions

1 (a) Do you support the proposal to introduce a market **restriction** (effectively a ban) in Scotland on each of the single-use plastic items listed and all oxo-degradable products?

Single-use plastic cutlery,

Single-use plastic plates (plates, trays/platters, bowls)

Single-use plastic straws

Single-use plastic beverage stirrers

Single-use plastic balloon sticks

Single-use food containers made of expanded polystyrene

Single-use cups and other beverage containers made of expanded polystyrene, including their covers, caps and lids

All oxo-degradable products

Yes to all

1(b). Please give reasons and where possible provide evidence to support the view expressed in response to Question 1(a).

- Please ensure that plastic straws on juice cartons are included in scope. Moreover, if these are replaced e.g. by paper alternatives, these should not be wrapped in plastic/cellophane.

- pollution of marine environment and harm to marine life

- the fossil fuels used to manufacture avoidable single-use plastics need to stay in the ground if we are to prevent catastrophic climate change

- contamination of human food chain when single-use plastics enter our oceans and through the chemicals in plastic containers, e.g. phthalates in polystyrene, which can affect the human reproductive system.

- littering of streets and beaches, which can be reduced by the promotion of **reusable** alternatives. Fife Street Champions alone have collected approx. 9,000 bags of litter, much of it plastic, in Fife this year.

- the items are used for a few seconds only, the benefit they provide is far outweighed by the damage they do; the price of convenience is too high.

- the items could be easily replaced with reusable alternatives without impacting hugely on profits or process

- many of these alternative items can be cheaper than the original item, offering a financial incentive to use environmentally responsible items. An example is expanded polystyrene food containers - to buy a case of 250 EP containers costs £0.06- £0.08 per unit, whereas the plastic-free alternative which usually consists of recycled materials or fully recyclable cardboard costs £0.04- £0.06. (Prices taken from a range of takeaway supply websites)

1(c). Do you support the introduction of a restriction on the manufacturing of the specified single-use plastic items, excluding those for which exemptions will be introduced? Please give reasons.

Yes

- the fossil fuels used to manufacture avoidable single-use plastics need to stay in the ground if we are to prevent catastrophic climate change.

- it would be an unhelpful mixed message to ban the commercial supply of the items in question but still permit their manufacture and say they are OK for private consumption (with the exception of medical uses/use by disabled people).

- it would be difficult to police commercial vs. private use, so a ban on manufacture will be much more effective than permitting manufacture for private use only.

- affordable non-plastic alternatives to these items are readily available

- banning the manufacture of these items is an opportunity to promote **reusable** rather than single-use alternatives and this philosophy should be embedded more deeply in the measures derived from this consultation.

- banning their use but not their manufacture puts the responsibility unfairly on the individual, when it is government and the corporate sector that need to step up.

- banning manufacture is also the most effective way to achieve the desired behavioural change.

2. To your knowledge, are any of the oxo-degradable products identified in this document present on the Scottish market? Are there any additional oxo-degradable products available on the Scottish market that we have not identified? Please provide evidence to support your answer.

We are not aware of any examples of oxo-degradable plastics but we fully support this restriction.

3. The SUP Directive includes limited exemptions for single-use plastic straws and balloon sticks. Are there other exemptions we should consider in relation to the market restrictions being proposed? Please give reasons.

No.

We are not convinced balloon sticks should have exemptions, why do they need to be plastic? Aren’t there alternative solutions for industrial applications?

4. How can we make sure disabled people have access to plastic straws if they require them for medical reasons or to support independent living, whilst at the same time restricting wider access for environmental purposes in a way that fulfils the SUP Directive requirements?

We need to listen to the views of people with lived experience of disability, it is not the place of people without disabilities to comment. Pursuing the development of suitable, easily accessible and affordable alternatives that meet all the relevant needs but are not single-use should be the way forward if possible, in close cooperation with representatives of disabled people. Better quality straws that can be washed and reused multiple times could be something to investigate.

5. This consultation highlights other items that the Scottish Government intends to consider market restrictions for in future (plastic wet wipes, plastic tampon applicators and those other products contained in the UK Plastics Pact’s list of items to be eliminated by end of 2020 which are not currently subject to existing or proposed market restrictions). Would you support the consideration of market restrictions on these items or any other items we haven’t listed? Please provide reasons and evidence where possible.

Yes to all.

It is important to ensure that in a switch back from plastic to cardboard tampon applicators, the cardboard applicators are **not packaged in plastic**, but in paper, like they used to be.

It is also critical to ensure that the new policy of providing free feminine hygiene products in public places in Scotland does not lead to the promotion of plastic/single-use instead of reusable/non-plastic alternatives (e.g. moon cups). This is a case where we need joined-up policy action, why not use the commendable policy of providing free feminine hygiene items as an opportunity to **promote plastic-free solutions** at the same time?

In general, if it is causing negative environmental impact, then it should be looked at. There are a number of items - like the items included in the consultation – that would be relatively straightforward to ban (easy wins) and these should be addressed as soon as possible. Other items may be more difficult or controversial to impose restrictions on in the immediate future, but this should not stop potential restrictions being investigated for them too, especially as many are major sources of plastic waste (critical challenges).

**Easy wins**

Other countries in Europe like France and Ireland are going even further than the Single-Use Plastics Directive, setting ambitious targets to eliminate further single-use plastic items completely. The Scottish Government should adopt the best practices of these countries and ban the following plastic items (this is not an exhaustive list, but provides some examples of the type of items that would be relatively easy to ban):

Condiment sachets; hotel toiletries; confetti; glitter; balloons; tea bags; free toys supplied with some food menus; disposable plastic cigarette lighters; plastic floss sticks; plastic price tags on clothes; plastic ties (e.g. for attaching signs to lampposts - these are no longer used by Fife Council, so a wider ban should be feasible); plastic windows in food packaging; disposable plastic razors and razor guards; plastic coat hangers; plastic dog waste bags (only **genuinely** biodegradable bags should be allowed).

**Critical challenges**

Other critical but perhaps more challenging items I would like to see subject to market restrictions in the near future:

Plastic cigarette filters; plastic six-pack yokes; PVC food wrapping; plastic bottles; crisp-style packaging; any hard to recycle mixed material packaging/items (e.g. blister packs for medication; mixed material plastic spray bottles); plastic toothbrushes (at least move to ones with removable heads, ideally to non-plastic alternatives such as bamboo).

I would also like the issue of one-a-day contact lenses and their containers to be investigated, though recognise it may be difficult to introduce a ban at this stage.

**Reasons:**

- The huge impact of **wet wipes** on our beaches, in the ocean and in our sewers is well known, although the fact that they contain plastic is perhaps less widely known among the general public and should be highlighted. The following video only hints at the scale of the problem: <https://www.facebook.com/PlasticFreeDalgetyBay/videos/285011132650128/>.

- Plastic **tampon applicators** are one of the most commonly found items on our beaches.

- Plastic **sachets** are one of the major sources of plastic pollution around the world and are not currently recyclable.

- Disposable plastic **cigarette lighters** are found on our beaches in large numbers for an item of this nature (approx. 1 every 200 m in Scotland and 1 every 150 m in England in the Marine Conservation Society’s Great British Beach Clean 2020). There is a reusable alternative – refillable metal cigarette lighters were the norm in the past. The disposable plastic lighters often still contain a substantial amount of lighter fluid, creating even more unnecessary waste that would not occur with a refillable alternative. Banning these is an easy win and would also support public health efforts to reduce smoking.

- Plastic **cigarette filters** are often overlooked as a source of plastic pollution, yet they are the third most common litter item found on our beaches (https://www.mcsuk.org/media/gbbc-2018-report.pdf). They do not benefit health as many smokers think. Biodegradable hemp filters that break down in matter of days are being used successfully by some companies.

- Plastic **floss sticks** use much more plastic than necessary, since the plastic “stick” part is surplus to requirements. Non-plastic floss is already available, so in time a ban on nylon floss should be investigated. In the meantime, however, the sticks just add to avoidable plastic pollution – these are also frequently found on our beaches after being flushed down the toilet.

- Plastic **six-pack yokes** can be particularly harmful to wildlife as they are highly prone to causing entanglement (see https://scontent.flhr2-2.fna.fbcdn.net/v/t1.0-9/51762745\_763131234065438\_7113998015924273152\_o.jpg?\_nc\_cat=102&ccb=2&\_nc\_sid=730e14&\_nc\_ohc=ZV0xEiygS4kAX\_gyRYR&\_nc\_ht=scontent.flhr2-2.fna&oh=c9b16781ad0bb5aaa0576f898340d69c&oe=5FE8244C)

- Plastic-based glitter and confetti are nothing more than ready-made microplastics

- I strongly urge the Scottish Government to bring **PVC food packaging wrap**, such as cling film, within the remit of this consultation. PVC contains toxic chemicals such as phthlates. https://www.theguardian.com/us-news/2019/may/28/plastics-toxic-america-chemicals-packaging. There are many reusable, cost-neutral alternatives to cling film such as reusable containers. Most councils do not currently accept plastic film such as cling film for recycling and such products will end up in landfill.

-Many dried supermarket products are packaged in **cardboard boxes with a plastic ‘window’** that allows the consumer to view the product inside. I urge the Scottish Government to ban the use of these ‘windows’ as they serve no purpose and in fact make it more difficult to recycle the packaging. Some manufacturers such as Buitoni are leading the way by removing these windows from their pasta products

- Every year, an estimated 750 million disposable **contact lenses** are used. These and their plastic containers are often flushed down the toilet and end up in the sea. The environmental impact of the lenses themselves is hard to quantify as they are almost impossible to detect once in the ocean – but it is likely to be highly significant. Alternative solutions should be investigated for the lenses and their containers. It is important to raise awareness of this issue and also investigate safe disposal, as landfill isn’t necessarily a safe option either.

6. Taking into account the accompanying Impact Assessments, can you identify any environmental, economic or social impacts we have not identified when developing the proposals contained in this consultation? Please give reasons.

It is the big companies driving this catastrophe, because smaller independent businesses, who might want to switch to better alternatives, cannot afford to do so if the big corporations continue to follow a disposable model. They are already struggling to compete as it is, so are forced to follow the lead and go disposable.

7. Do you believe the COVID-19 pandemic has resulted in changes to the market or wider economy that are not fully accounted for through this consultation? Please give reasons

- A clearer message/media campaign is needed to clarify the fact that plastic packaging offers no protection against Covid-19 compared to reusables. There has been a big increase in the use of food items packaged in plastic among consumers who incorrectly believe this to be safer. The same applies to the use of single-use plastic gloves as opposed to hand washing. There is a large body of evidence gathered from world-leading experts that the risk of COVID infection from surface transfer of the virus is no worse with reusables than disposables (see e.g. <https://www.sas.org.uk/news/unpacking-refill-and-reuse-in-the-age-of-corona/>).

- Refills/reusable cups must continue to be promoted, the rollback against this by some fast food chains is not evidence-based and they should not be allowed to ban people from using their own reusable cups. Solutions like “contactless coffee” (<https://www.citytosea.org.uk/contactless-coffee/>) should be promoted

- ‘Fife Street Champions’ have recorded almost 2,000 face masks during litter picks in Fife since mid-September. Medical centres are asking clients to wear a disposable face mask rather than their own reusable masks when being consulted. I call on the Scottish Government to encourage the public to use reusable masks as part of a media campaign across all channels.

- The pandemic has also resulted in change in systems that have increased waste, e.g. serving school lunches in classroom in disposable containers rather than the regular reusable plates as it is easier and less time-consuming (it seems that some schools in East Lothian were already doing this pre-Covid, which should be completely unacceptable). The same applies to the requirement for massage therapists, hairdressers, etc. to use disposable aprons. This is not evidence-based, as washing of reusable aprons is just as effective a means of inactivating the virus. Some workplaces are telling employees they are not **allowed** to wear reusable face coverings, they have to wear disposable ones. This HAS TO BE be addressed, the requirements MUST be changed to allow reusables, and organisations must be re-educated.

- Given the large rise in disinfectant sales, more needs to be done to promote refills for disinfectant products.

8. Do you have any other comments that you would like to make, relevant to the subject of this consultation, that you have not covered in your answers to other questions?

* The Scottish Government should introduce an ambitious **Circular Economy Bill** with robust targets to reduce our overconsumption of all resources, not just plastic.
* **Plastic bag charge exemptions must be reviewed**, the current exemptions for pharmacies, bakeries and airports, for example, should be rescinded. Increasing the charge to 10p seems like a token gesture, it is hard to see how this will make a significant difference. A ban is needed to tackle the remaining, avoidable plastic bag use.
* While I welcome the deposit return scheme as an interim solution, a **ban on plastic drinks bottles** must be investigated. In terms of implementation, in Germany and Finland, the public can take recyclable items to a shop to be deposited in return for a voucher that can be used in store. This eliminates the concern of homeless individuals and people with addictions from collecting items that they can return for cash that can then be used to fund their addictions.
* I welcome the mention of **fishing gear**, but much more detail is required on the measures to address the issue of plastic fishing gear being dumped at sea, where it then continues to kill marine creatures for decades or centuries. Much tougher regulation and enforcement is required here, how will EPR work if the gear is dumped at sea?
* I welcome the proposed ban on balloon sticks. However, the **balloons** themselves and the **ribbons** often attached to them are also a huge threat to wildlife and the environment. I would welcome restrictions on their sale and/or their intentional release into the environment.
* A charge for **single-use beverage cups** needs to be followed up by a phase-out of these cups.
* It is vital to ensure that any **extended producer responsibility** scheme is effective in delivering the goal of REDUCING single-use plastics. Manufacturing bans would be much better. If manufacturers simply pass the cost of EPR on to consumers, then we end up paying for big plastic to dispose of plastic packaging that we never asked for in the first place. While EPR can work e.g. for batteries and electrical goods, recycling/end-of-life disposal is not the solution for hard-to-recycle plastics. Manufacturers want to keep making these products, so they will be happy to dispose of them at the end of their lives if that is what it takes, especially if they can pass the cost on. If “disposal” means incineration, then it will release huge quantities of carbon dioxide into the atmosphere. What we need to do is stop making these things in the first place.
* All public authorities should be responsible for **tracking all their plastic waste** to landfill or waste reprocessing to ensure that it is not shipped offshore. This could be financed through EPR. Also, there must be much greater **transparency**, so the public can easily find out what happens to it, which is not currently the case. The Scottish Government must develop a sustainable strategy for the millions of empty tubs that held sanitising wipes and are being disposed of in schools and hospitals
* Reduction **targets**, improved and more strongly regulated **labelling** and **awareness raising** should also be employed, in addition to the proposed bans, to tackle other single-use plastic items such as wrappers, packets, plastic bottles, plastic-lined cartons, etc. Terms such as “flushable” should be banned on labelling, instead there should be a legal requirement for clear labelling stating how the item in question can be disposed of responsibly. There should be stronger regulation of inaccurate labelling, e.g. claiming something is “biodegradable” when it is in fact just “(oxo-)degradable” or “compostable” (i.e. only under optimal conditions in industrial composters) vs. “home compostable”, or “widely recycled”. Most consumers do not yet appreciate the distinctions.
* Consider government support for businesses that supply reusable alternatives to SUPs or that move over from producing harmful plastics to **genuinely** more sustainable alternatives. Also for businesses that switch to producing plastics that can easily be reused/recycled multiple times.
* It is also important that the conversation about tackling plastic pollution in Scotland addresses **Ineos** in Grangemouth, the largest producer of plastic in the UK. Ineos continues to import large volumes of fracked gas from the US to Scotland to make plastic, which undermines the Scottish Government’s current ban on fracking in Scotland. The longer we invest in or support the fossil fuel-based plastic industry, which is heavily resource-intensive, the longer we lock Scotland into increasing emissions that fuel the escalating climate crisis. I urge the Scottish Government to use the Grangemouth Future Industry Board to map out a Just Transition and strong future for Grangemouth with the phasing out of fossil fuel-based plastic production.
* I am also supportive of the Scottish Government’s movement on applying tax to items that do not contain 30% recycled materials as this will introduce a financial incentive for businesses to change the materials they are using which will in turn benefit the environment. I believe that this is a good first step, however I do worry that this will plateau the development of moving away from being a plastic-reliant society. I would like to see the government pushing businesses to use highly recyclable materials such as glass which have been recycled for decades and have a vast range of potential uses.
* I would strongly support a ban on the use of **elastic bands** by postal workers. Environmental leaders in Fife have identified several areas where these are systematically dropped on the streets where Royal Mail vans are parked. The bands cause entanglement of hedgehogs and birds and end up in the ocean via the drains. Royal Mail claims it instructs its workers not to drop them, but this message is clearly not getting through.
* Environmental Report
* We have not provided responses to the section on the environmental report, as it is over 200 pages long and we don’t have the resources for this.