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, scope must include straws on juice cartons.

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

- pollution of marine environment and harm to marine life

- fossil fuels used in manufacture of avoidable single-use plastics

- contamination of human food chain

- littering of streets and beaches

- the items are used for a few seconds only, but do a lot of damage

- the items could be easily replaced with reusable alternatives

- the alternatives can be cheaper than the plastic items they replace

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

- it would be difficult to police commercial vs. private use

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

- banning the manufacture of these items is an opportunity to promote **reusables**

- banning their use but not their manufacture puts the responsibility unfairly on the individual

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?

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 disabled people on this, 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.

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.

Cardboard tampon applicators must be packaged in paper, not plastic!

The Scottish Government should adopt the best practices of the most ambitious countries and ban the following items, which are examples of **easy wins**:

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 (for attaching signs); plastic windows in food packaging; disposable plastic razors and razor guards; plastic coat hangers; plastic dog waste bags.

Other 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; plastic toothbrushes.

I would also like the issue of one-a-day contact lenses and their containers to be investigated.

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 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.

- 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.

- I call on the Scottish Government to encourage the public to use reusable masks, including in medical centres, 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; requirement to use disposable aprons for massage therapists, hairdressers etc.; bans on reusable face coverings in workplaces. This should also be addressed and organisations re-educated.

- Refills for disinfectant products must be promoted.

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** addressing overconsumption of all resources.
* **Plastic bag charge exemptions must be reviewed**, the current exemptions for pharmacies, bakeries and airports, for example, should be rescinded.
* While I welcome the deposit return scheme as an interim solution, a **ban on plastic drinks bottles** must be investigated. Items could be exchanged for vouchers redeemable in store to prevent abuse of the system.
* I welcome the mention of **fishing gear**, but much more detail is required on the measures to address this issue.
* I welcome the proposed ban on balloon sticks. However, the **balloons** themselves and the **ribbons** often attached to them must also be addressed.
* 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.
* 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, and **transparently disclosing** what happens to it. This could be financed through EPR. A sustainable strategy is needed for wet wipe tubs in schools and hospitals.
* Reduction **targets**, improved and more strongly regulated **labelling** and **awareness raising** should also be employed, to tackle other single-use plastic items such as wrappers, packets, plastic bottles, plastic-lined cartons, etc. There should be stronger regulation of inaccurate labelling, e.g. claiming something is “biodegradable” when it is in fact just “(oxo-)degradable”
* Consider government support for businesses that supply reusable alternatives to SUPs.
* We need to address the issue of **Ineos** in Grangemouth, which continues to import large volumes of fracked gas from the US to Scotland to make plastic. 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 support a tax on items that do not contain 30% recycled materials, though this is not enough to end our over-reliance on unnecessary plastics. Highly recyclable materials should receive government support.
* 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.

Environmental Report

We have not provided responses for this section due to the length of the report.