IEMA reponse to the Department for Environment, Food & Rural Affairs consultation on proposals to ban commonly littered single-use plastic items in England

About IEMA

IEMA is the professional body for everyone working in environment and sustainability. IEMA's growing membership of over 18,000 professionals work at the interface between organisations, the environment and society in a range of critical roles (for example from sustainability directors through to circular economy leads and in consultancy and advisory roles). We also work with a range of corporate partners. Our professional members are active across all sectors in the UK, from construction and manufacturing through to logistics, facilities, and across financial, retail, food, consultancy and the wider service and public sector.

Executive summary

Within IEMA, our Circular Economy Network brings together skilled and experienced experts, operating across a variety of economic sectors to share good practice and case studies, who help develop tools to assess maturity, and contribute to shaping legislative, policy, research, standards and guidance initiatives on the topic of sustainable resource and waste management as part of the circular economy.

To help inform its position on this consultation, IEMA hosted individual discussions with its circular economy steering group members to collect perspectives. The steering group comprises of expert practitioners, Chartered Environmentalists and IEMA Fellows who strive to develop and embed circular economy principles into their relevant sectors.

The response focuses on specific questions form the consultation whereby IEMA members had substantive insights to provide. The questions where answers have been provided are 1, 2, 3, 4, 6, 7, 9 and 10.

The submission recommends that:

- The government uses a more unified approach to the definition of plastics to ensure consistency which extends further than the UK. IEMA recommends the government adopts the EU Taxonomy to underpin changes in legislation using the six key environmental objectives.

- The government incorporate circular economy principles into changes in legislation that bans the single-use plastics referred to in its consultation and that there is support and toolkits for alternative products. Decisions need to be clearly evidenced and environmentally balanced.

- The government supports and helps create a scientific and evidence-based measurement of circularity that has a threshold that deems a new product not circular enough, supporting the Green Claims Code.

- The government does not make exemptions where there is a suitable environmentally balanced alternative product that is circular.

- The government must go further to ensure alternative products to single-use plastics do not have unintended consequences for the environment and that it works with the relevant bodies to produce a standard to help new products at the conception stage.

Q1. Do you agree or disagree with the proposed definition of plastic?

IEMA believes that a consistent and aligned definition must be used to enable a clear and robust understanding of single-use plastic. Using clear and collaborative language and definition systems that align internationally and/or with large trading blocs is essential due to the transboundary movement of plastics, whether this is through trade or plastic pollution. Finding the right solutions depends on our understanding of the different types of material within the category of "plastics", as the solutions will differ depending on the chemical composition of the material[1]. IEMA recommends using a standard and widely recognised scientific definition of plastic, for example, that used by the Royal Society of Chemistry[2].

IEMA recommends that government adopts the EU Taxonomy[3] classification system to determine whether an economic activity is environmentally sustainable. The EU Taxonomy is underpinned by six main environmental objectives: climate change mitigation, climate change adaptation, sustainable use of water and marine resources, circular economy, pollution prevention, and health ecosystem which are essential to transforming the world to sustainability, IEMA's core vision, and puts action against problematic single-use plastic in the right sustainable direction.

By doing so, we can also ensure there is no misunderstanding of what constitutes as single-use plastic and its composition and that sustainability and circularity are kept as a priority when alternative products come to market, creating security for investment for environmental alternatives and avoiding greenwashing. Furthermore, using consistent and shared definitions will support better administration and coordination in the plastic industry, for example, managing standards, production, imports and exports and waste management activities.

Adopting this approach will also help to develop the right sustainable alternatives to single-use plastic coming to market, supporting and expanding the Green Claims Code. Fundamentally definition uniformity can avoid confusion and support futureproofing for policymaker and investor activity, and help companies to become more environmentally responsible, whether the products are imported, exported and/or created and used in the UK.

[1] https://www.rsc.org/globalassets/04-campaigning-outreach/policy/environment-health-safety-policy/plastics-sustainability.pdf
[2] https://pubs.rsc.org/en/content/chapterhtml/2018/9781788013314-00001?isbn=978-1-78801-241-6
[3] https://ec.europa.eu/info/business-economy-euro/banking-and-finance/sustainable-finance/eu-taxonomy-sustainable-activities_en

Q2. Do you agree or disagree with the proposal to introduce a ban on the supply of the following single-use items in England?

IEMA supports the ban of unnecessary single-use plastic items (plastic plates, bowls and trays; plastic cutlery; plastic balloon sticks; and expanded to include extruded polystyrene (EPS) containers for food and beverages) referred to in this consultation.

We should emphasise that action from the government must provide the most environmentally balanced approach. By this we recommend that environmental outcomes are optimised across multiple environmental criteria (for example, GHG emissions, plastic pollution, water resource, air quality and waste reduction). We feel that in this proposal, the government should have set clear, robust and consistent criteria against decisions on whether to ban certain single-use items. The assessment of the single-use items to be banned should then include the assessment of suggested alternatives to demonstrate the preferred outcomes will be better for the environment and tackle the issue the proposal sets out to achieve.

For example, the criteria should include full lifecycle carbon impacts, litter reduction, reduction of plastic pollution and micro plastics. The impact assessment discusses carbon, but it is not clear over what period. A life cycle analysis approach to carbon is key to understanding the impacts of whole process. It is unclear in the government's calculations of carbon dioxide equivalent if the carbon impacts are measures for all the stages of the product's life, especially when quantifying the alternatives.

We urge the government to ensure circular economy principles are at the core of all legislative changes and that support is given through standards and toolkits to ensure alternatives to single-use plastics are given research and development opportunities, regulated and controlled through definition standardisation.

Q3. We propose the ban should cover all single-use bio-based, compostable, and biodegradable plastic (such as PLA).

IEMA supports environmentally balanced changes that promote circular economy principles. We believe that developing a new single-use product to displace a plastic item will create a new waste that will require a new carbon intensive waste management system to deal with its throw-away societal usage. This can lead to sub-optimal outcomes, especially when reuse schemes, such as reusable cups and crockery are easy, readily available and are longer term solutions that provide environmental benefits.

Biobased, compositable and biodegradable single-use plastic promotes recycling and doesn't focus at the top tier of the waste hierarchy to reduce waste in the first place. There are products on the market that claims to be compostable however some of these are only compostable in controlled settings and do not degrade naturally in the environment. These differences between products that can be composted at home or only commercially adds confusion and can risk contamination to recycling streams. Banning bio-based, compostable and biodegradable plastic will support the government's plans for household recycling consistency and avoid confusion of what can and can't be recycled.

Q4. Do you agree or disagree with the proposal to exclude from the ban a) single-use plates used as packaging or b) single-use plates used as packaging except those used in eat-in settings?

We disagree there should be any exemptions to single-use plates where there is an environmentally balanced and circular alternative available.

Q6. In the event of a ban on the proposed items, which product(s) would you provide to customers as an alternative?

We would suggest that circular economy principles and waste hierarchy thinking are used in order to develop products that can be offered to customers as viable alternatives. These also must be environmentally balanced and not cause unintended environmental consequences**.**

We would recommend the government supports and helps create the use of a scientific and evidence-based measurement of circularity that has a threshold that deems a new product circular enough to be put on the market. This measurement of circularity would support the Green Claims Code and apply a consistent approach to reducing harm to the environment from plastics while using consistent definitions.

Q7. Are there any risks that alternatives to single-use plastic plates, plastic cutlery, plastic balloon sticks, EPS food containers, and EPS beverage containers will themselves have significant environmental impacts?

We have already seen alternatives to single-use products come to market, for example, aluminium cans of water to replace single-use plastic water bottles. Aluminium has a much higher carbon footprint than plastic and in city settings, like London, most of bottled water (around two thirds) is consumed on the go with very little making it into the recycling system [4].

Alterative products that are designed to replace an item that has been banned must be environmentally balanced and the circular economy principles are at the top of any product design hierarchy. IEMA welcomes the Green Claim Code to ensure that any alternative products claiming to be green will be scrutinised. . However, intervention and support should be available at product design and conception stage to stimulate innovation, research and development into environmentally and sustainable options that do not have negative environmental impacts and unintended consequences.

In 2021, IEMA Circular Economy Steering Group developed a successful Extended Resource Ownership (ERO) model. This process flow approach considers design, procurement, sustainable business, remanufacturing and increasing circularity of materials. The step-by-step approach, along with examples provides users with bite-sized explanations at each stage of the product process, enabling practitioners and academics to share the circular economy with non-specialists [5].

While initially focussing on manufacturing, the network is developing other versions of the resource for construction and planning for the water industry and agriculture, with a view to incorporating any sector that needs to engage in the Circular Economy. IEMA would be happy to work with government to develop

[4] https://www.london.gov.uk/sites/default/files/london_environment_strategy_0.pdf
[5] IEMA - Circular economy

a model for alternatives to single-use plastic items ensuring circularity is at the top of the decision-making hierarchy.

Q9. Should there be any exemptions from any ban for the following items e.g., in certain locations or for particular purposes?

We understand there might be some health and security settings where single-use plastic items may be needed. We would urge the government to ensure they have consulted with experts from industries, interest groups and other organisations such as the NHS and the Care Association Alliance. This will help to ensure people are not disadvantaged from a ban and to explore how alternative reusable plastic or non-plastic could be used.

Q10. Timing of the ban.

Our proposed date for the ban on single-use plastic plates, plastic cutlery, plastic balloon sticks, EPS food containers, and EPS beverage containers is April 2023. We think this will allow sufficient time for industry to use up existing stock and source alternatives where needed. Do you agree or disagree that this date will give industry sufficient time to prepare for the ban? E.g., sourcing alternative products, using up existing stock

We are supportive of the ban coming into law in April 2023, however, the government needs to consider there could be some supplies and stock that may need longer to use and therefore avoid unnecessary disposal and cost to industry and businesses.

IEMA wants to see the elimination of problematic plastics as soon as possible. However, we suggest exploring a staggered approach, banning the purchase of the single-use plastic items (stock) and then a sufficient time allowed to use these stocks and source alternatives with an absolute end date of when they can be used. We do not have evidence from the industry on stock levels and believe the government can use industry and purchase data to make recommendations of appropriate time scales.

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