



Single-use plastics call for evidence  
Energy and Transport Tax team  
HM Treasury  
1 Horse Guards Road  
London  
SW1A 2HQ

15 May 2018

Dear Sir/Madam

### **Tackling the plastic problem**

#### **Using the tax system or charges to address single-use plastic waste**

Thank you for the opportunity to respond to this call for evidence. The LARAC response is contained below.

The responses below are sent on behalf of the Local Authority Recycling Advisory Committee (LARAC). LARAC is an association of around 75% of local authorities across England, Scotland, Wales and Northern Ireland. Members are waste management and recycling professionals who co-ordinate and operate waste management services. Membership is drawn from all types of authority including statutory Waste Collection (WCA), Waste Disposal (WDA) and Unitary Authorities.

Our response has been peer reviewed by members of LARAC's policy team and executive committee. LARAC members have also been invited to comment on the consultation through the members' discussion forum on our website. All contributions received have been taken into account in drafting the response below. LARAC's Policy Team focused its resource to consider the areas where local authorities can have the most influence. Questions 5-12 which relate to production and retail have not been responded to.

#### **1. How should the government define single-use plastics, and what items should be included and excluded, and why?**

Plastic products which are intended for single use and then discarded should be considered as single-use plastics. This includes on the go plastic products where the item is purchased with the food or drink product ready for consumption such as beverage containers and lids, stirrers and takeaway boxes. Once the item is consumed the packaging becomes waste as it is not suitable for reuse.

The definition should also be wide enough to include items which have the potential for reuse, but are generally only used once. For example bottles with a screw cap could be used more than once, although generally are not.



**2. What are the most important problems associated with single-use plastics, and why?**

Many single use plastics are not readily recyclable and are therefore not suitable for collection through the kerbside recycling service (such as polystyrene boxes, coffee cups and stirrers).

The range of single use plastics that can and cannot be recycled through the kerbside system is potentially confusing to some residents. This could be contributing to increased contamination levels of the recycling stream. Similarly some single use plastic items which can be recycled are being placed in the residual waste stream and therefore recycling levels are lower than they could be.

Food and drink items consumed on the go are often contaminated with excess residual food and drink and therefore not suitable for recycling unless rinsed even if the packaging is recyclable. The opportunity and willingness to do this by the majority of the population whilst on the go is limited.

On the go plastic film, beverage containers and take away boxes make up a sizeable proportion of litter and are therefore problematic to local authorities. LARAC is aware that Eunomia have estimated that 17% of litter (by weight) is drinks containers. Littering decreases the amenity value of an area and in areas where heavy littering occurs there may also be a greater frequency of fly tipping and graffiti. Street cleaning and litter clearing activities cost local authorities around £800 million a year.

**• Which polymer types are particularly problematic?**

Plastic film (LDPE), mixed polymers and polystyrene are problematic waste streams for local authorities as they are not readily accepted by MRF's for recycling and lead to contamination of the recycling streams. There are also limited viable reprocessing opportunities if the material has not been source segregated especially where the container is a multi-material composite product e.g. paper cup with flexible plastic lining and rigid plastic lid.

**• Which items are particularly problematic?**

Composite products, polystyrene (packaging, beverage and food containers and disposable cutlery) and black plastics (pots, tubs and trays) regularly contaminate the kerbside recycling stream.



**3. Are there more environmentally friendly alternatives, currently available or possible in the future, to these types of single-use plastic items or their manufacturing processes, and can they still offer similar benefits?**

- **Should the government encourage biodegradability in plastics, and if so, how?**

Environmentally friendly alternatives should be designed to be clearly distinguishable from a similar plastic product to prevent contamination of waste streams and clear labelling of the item is essential.

If biodegradable plastic enters the plastics recycling stream it can contaminate the recycling process and reduce the quality of the recycled plastic. Similarly degradable plastics are not always suitable for the composting process and could put the companies PAS accreditation at risk. Some composters also do not have the sophisticated sorting equipment in place to distinguish plastics from biodegradable plastics and therefore all types of plastic will be extracted and sent for disposal.

If biodegradable plastics are to be used in parallel with oil based plastics it must be considered how these materials will be collected and sorted and must be compatible with current local authority collection infrastructure. Any change introduced should be supported by a full evaluation on the collection and processing infrastructure to ensure there is no negative impact on the investment requirement for local authority public realm, kerbside or household recycling centre waste services.

If plastic alternatives are introduced, this would also make it potentially more complicated for the public as different disposal routes would be required and would need to be clearly communicated. Local authorities would require additional funds to deliver this effectively.

**4. Are there single-use plastic items that are deemed essential by their nature or application, which cannot be substituted or avoided?**

The 25 year Environment plan outlines the ambition of the UK to be a world leader in resource efficiency and eliminating avoidable plastic waste by 2042. Priority should be given towards substantially reducing the need for single use plastics, with continued use only where clearly justified. In accordance with Circular Economy principles manufacturers should be committed to investigating suitable alternatives for single use plastic items, even for those which are currently considered essential.

**Questions 5-11 relate to production and retail and have therefore no comment has been provided**



**12. What factors influence consumers' choices related to single-use plastic items?**

**• How can the government encourage the re-use of these items?**

Consumers should be encouraged, where feasible to avoid buying the plastic item in the first place through using re-use containers specifically designed for the purpose. LARAC believes that the UK should investigate the potential for direct charging for kerbside collections. This is likely to bring a step change in resident behaviour as there is a financial incentive to reduce the amount of waste generated. Case studies from other countries that have implemented direct charging suggest it does bring about a change in consumer behaviour and the use of recycling systems increases. Overall waste levels have also been shown to decrease which could indicate higher reuse levels.

Packaging design can substantially influence consumer choice. Plain packaging has been introduced to discourage the purchase of cigarettes. A similar approach could be used for single use plastics where appropriate, with the reusable replacement more appealing.

Taxes and levies could be applied, although for these to be successful sustainable alternatives must be readily available at a competitive price. LARAC would not recommend this as a high priority measure to be introduced unless alternatives are readily available.

**13. What are the barriers to consumers choosing alternatives to single-use plastic items, and how responsive would consumers be to price changes?**

Alternatives must be convenient and competitively priced for consumers to change behaviours away from purchasing single use plastics. For example, the nature of on the go items are they can often be impulse purchases and therefore many consumers will not be prepared with a reusable container. In these situations a more sustainable disposable item may need to be offered, at least in the short term to allow businesses to continue to operate while consumers become accustomed to the behaviour changes required of supplying a reusable container.

For regular purchases where the purchase has been pre-planned before leaving the home small price changes may be a sufficient incentive for the consumer to supply a reusable container.

**14. In what way, and to what extent, do the decisions of producers and retailers influence consumer choice?**

No comment

**15. In your opinion, how can the tax system or charges play a role in delivering better environmental outcomes at this stage?**

**• What interventions should be implemented, and why?**

Taxes can be imposed on virgin products which have a high environmental impact or are used in less sustainable products. This could include materials used in the manufacture of single use plastics such as polystyrene. Similarly tax breaks could be provided for sustainable



alternatives, such as compostable, re-usable products or items with a high recycled material content.

See also question 12 regarding Direct Charging, taxes and levies.

• **What behavioural effect would these interventions have, both on this stage in the supply chain, and more broadly?**

The behavioural effect of direct charging is discussed in question 12.

Taxes and levies on single use plastic products could stimulate the demand for sustainable alternatives and therefore supply of alternative products would also increase. This could stimulate local business developments if the taxes raised are directed back to the industry. As referred to previously taxes and levies will be most successful and accepted by users and businesses if a convenient and competitive sustainable product is available.

• **What would be the impact on consumers?**

The impact of Direct Charging could encourage greater reuse so as to avoid a disposal fee or the purchase of items which are recyclable as this is likely to attract a lower disposal fee than a non-recyclable item. Those which continue to purchase single use plastics with limited recycling opportunities will face increased costs.

The introduction of taxes or levies is likely to be unpopular with many consumers, especially in the short term. As indicated in question 12 alternatives need to be convenient and readily accessible. If this is the case most consumers are likely to quickly adapt and accept the change as there is no long term negative impact, which has been shown to be the case with the plastic bag levy.

• **Are there specific items the government should be focussing on?**

With the Circular Economy principles in mind, priority should be put on:

- producers to design products to minimise resource use and either encourage reuse or maximise recyclability. Producer responsibility delivered through the PRN system does not provide a true reflection of the cost burden of recovering single use plastic packaging waste or incentivise investment in the industry. LARAC recommends a fundamental revision of the packaging producer responsibility system to encourage local investment in infrastructure and for products to be designed with re-use and recyclability as a priority.
- the public on their purchasing and recycling habits. Investigating the potential for Direct Charging for consumers for their waste is also likely to assist in achieving the reuse and recycling behavioural shifts aspired to in national policy (see question 12).



**16. What are the barriers to the collection of single-use plastics and more environmentally friendly methods of waste treatment, including barriers to any existing technologies?**

The potential for recycling of many single use plastics is currently low due to limited availability of reprocessors and the capability of MRFs to separate some these waste streams. The barrier to collection is therefore dictated by the limited opportunities for sorting and end markets, rather than collection infrastructure.

Investment in UK waste and recycling infrastructure is low. The current PRN system places no obligation on reprocessors and exporters receiving PRN revenue to invest in improving local infrastructure. The uncertainty of income resulting from fluctuating PRN prices is also not conducive for long term investment which has resulted in a relatively immature recycling market in the UK.

Capturing on the go plastics which are compatible with the local authority public realm recycling infrastructure is also challenging. Local authorities operate very few on the go or street bin recycling schemes. The contamination level in these bins is high and therefore yield very little recycling material.

**17. In your opinion, how can the tax system or charges play a role in delivering better environmental outcomes at this stage?**

**• What interventions should be implemented, and why?**

See question 12 and 15 for recommendations for PRN reform, tax breaks and taxes and levies.

**• What behavioural effect would these interventions have, both on this stage in the supply chain, and more broadly?**

PRN reform has the potential for the circular economy to be forefront in the change. The PRN system could encourage producers to develop products which use materials which are sustainably sourced and for the design to use components which can easily be separated for recycling or reused. This would encourage greater local investment which would not only provide for a more stable market for the recycle, it would also boost the local economy through investment and support local jobs.

**• What would be the impact on Local Authorities and business?**

If businesses took greater responsibility for the design of products to minimise the environmental impact of the product, maximise recycling and encourage reuse there would be a greater balance in the responsibility for managing the plastic waste between manufacturers, retailers and local authorities. This could result in significant savings for local authorities which could then be directed towards other essential services.



If you have any queries on this response then please contact me at [admin@larac.org.uk](mailto:admin@larac.org.uk)

Yours faithfully,

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**LARAC** Policy Team