

Reducing single use plastics - Proposals to ban nine single use plastic products in Wales - Consultation response form

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Sector (if applicable):	Environment
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Our proposals for the bans

1. Do you support our proposal to ban each of the single use plastic items listed below? If not, please give reasons and where possible evidence to support this view.

Item number	Item description	Yes	No	If no, please give reasons / evidence
Item 1	Cotton buds	yes		
Item 2	Plates (including trays, platters, bowls and laminated paper plates)	yes		
Item 3	Cutlery (including forks, knives, spoons, chopsticks and sporks)	yes		

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Item 4	Drinks stirrers	yes		
Item 5	Straws	yes		
Item 6	Sticks for balloons	yes		
Item 7	Beverage cups made of expanded and extruded polystyrene	yes		
Item 8	Food containers made of expanded and extruded polystyrene	yes		
Item 9	Products made of oxo-degradable plastic.	yes		

What our research tells us about the impacts of such a ban in Wales

2. Do you agree the potential environmental and social benefits of our proposals outweigh the potential impacts on people in Wales? Please give reasons and where possible evidence to support this view.

Y	N	Reasons / Evidence
yes		<p>A ban on the supply and use of single use plastics is an important step towards reducing the pollution caused by litter.</p> <p>Litter in the countryside and on beaches is aesthetically unpleasant and detracts from Wales' image as a beautiful natural environment.</p> <p>Furthermore, plastic litter is not just unsightly but can cause physical harm to wildlife. It has long been known that mammals and birds can die as a result of becoming ensnared in discarded items of plastics and marine animals will ingest items of plastic either accidentally or because they mistake them for food such as jellyfish. Fragments of plastic are potentially even more damaging especially when they break down to micro- and nanoparticles. There is an extensive scientific literature on this topic; see, for example Alimbo & Faggio 2019 'Microplastics in the marine environment: current trends in environmental pollution and mechanisms of toxicological profile' Environmental Toxicology and Pharmacology vol. 68, 61-74. The presence of these particles presents a serious environmental threat to wildlife and also has implications for human health as these materials can be ingested in seafood.</p> <p>In the short term, as businesses adjust to the new requirements there will be some costs but, as stated in the consultation document, these will be short term.</p>

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3. Do you agree with our assessment of the potential benefits and impacts our proposals will have on businesses, including manufacturing, in Wales? Please give reasons and where possible evidence to support this view.

Y	N	Reasons / Evidence
Yes		UKELA Wales has no direct evidenced on the potential impacts on business in Wales but considers it likely that Welsh industries will respond to the new requirements in an innovative way that could lead to new manufacturing opportunities. Wales could become world leaders in this area.

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4. Should oxo-degradable plastics be included on the list of items to be banned? Please provide evidence to support this view.

Y	N	Reasons / Evidence
Yes		<p>It is extremely important that oxo-degradable plastics should be included for two reasons:</p> <ol style="list-style-type: none"> 1) these plastics degrade into micro and nano particles which spread throughout the environment and, as noted above, can have serious consequences for wildlife and for human health. They are an invisible form of plastic pollution and no amount of litter clearance will remove them. 2) these products are confusing as they are often described as biodegradable thereby creating a sense of false security because people think they can be safely discarded. Other forms of degradable wrapping materials are being used now (e.g. potato starch) and these can be safely disposed of but there is no obvious way of telling these apart from the oxo-degradable materials.

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5. Do you believe the COVID-19 pandemic has resulted in changes to the market that are currently not accounted for in our research? Please give reasons and where possible evidence to support this view.

Y	N	Reasons / Evidence
		UKELA Wales has no views on this issue.

Exemptions to avoid disproportionate impacts

6. Do you agree with the exemptions we are proposing and how we make them as clear and practicable as possible to apply? Please give reasons and where possible evidence to support this view.

Y	N	Reasons / Evidence
		<p>UKELA Wales agrees that there should be as few exemptions as possible and that these should be set out as clearly as possible.</p> <p>We do not understand why it is considered that plastic straws used in hospitals and care homes should be exempted. There are other forms of single use straws –e.g. bamboo straws – that could be used. Most people in care homes will be of an age that they will have been familiar with non-plastic straws and should not have problems using them.</p>

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7. Are there other exemptions we should consider in relation to all of the single use plastic items in our proposal? Please provide as much detail as you can.

Item number	Item description	Yes	No	Reasons / Evidence
Item 1	Cotton buds		no	
Item 2	Plates (including trays, platters, bowls and laminated paper plates)		no	
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Item 8	Food containers made of expanded and extruded polystyrene		no	
Item 9	Products made of oxo-degradable plastic.		no	

Transitional arrangements

8. Do you agree the proposed timescale for the implementation of the bans provides sufficient time for businesses of all types to adapt? Please give reasons and where possible evidence to support this view.

Y	N	Reasons / Evidence
		UKELA Wales agrees that the proposed timetable provides sufficient time for businesses to adapt and is pleased to see that it is proposed to bring the changes into force within a year.

Enforcement and sanctions

9. Do you agree with the use of Civil Sanctions?

Y	N	Reasons / Evidence
Yes		If rigorously applied, civil sanctions should provide a suitable method of enforcement and if used alongside education and guidance will help to create incentive to bring about change for the good of Wales as a whole whereas criminal sanctions could be seen as too draconian.

10. Do you agree that Local Authorities should enforce the ban?

Y	N	Reasons / Evidence
Yes		It is not obvious to UKELA Wales who should do this if not Local Authorities. However, it will be essential that they are adequately resourced to be able to carry out this work or the ban may prove ineffective. UKELA Wales suggests that the enforcement activities of local authorities should go alongside a programme of public education and information so that shoppers and consumers will be prepared to draw attention to any failures to comply.

Future Developments

11. Should wet wipes be included in future proposals for further bans or are there other measures which could be introduced to address them, for example Extended Producer Responsibility? Please give reasons and where possible evidence to support this view.

Y	N	Reasons / Evidence
Yes		<p>Wet wipes are convenient. However, they are not essential items. Unfortunately, when used indoors they are frequently disposed of via the sewerage system where they cause blockage and when used outdoors they are frequently discarded and add to the litter burden. Even if properly disposed of, they finish up as landfill. UKELA Wales believes that the benefits of convenience do not outweigh the disadvantages, especially given the high level of inappropriate disposal.</p> <p>UKELA Wales does not consider Extended Producer Responsibility to be a suitable alternative to a ban because the main problem lies with the consumer not the producer.</p> <p>Although their removal would be inconvenient during Covid, UKELA Wales believes that the people will readily adopt other measures to ensure work surfaces are clean.</p>

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12. Are there any other items that should be included in any future policy proposals to tackle single use plastics? Please give reasons and where possible evidence to support this view.

Y	N	Reasons / Evidence
		<p>Many people now use vapourisers as a device to help them give up smoking. There should be a ban on the sale of single use (non-refillable) vapourisers not only because of the plastic content but also because they contain batteries.</p> <p>Similarly, UKELA would support a ban on non-refillable plastic cigarette lighters.</p>

Welsh language questions

We would like to know your views on the effects that banning the distribution and /or sale of the proposed single use plastic items would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.

13. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

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14. Please also explain how you believe the proposed policy for banning the distribution and /or sale of the proposed single use plastic items could be formulated or changed so as to have positive effects, or increased positive effects, on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.



Other comments

15. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please indicate here:

Y	N
	no