

Single-use plastics call for evidence
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By email to: ETTanswers@hmtreasury.gsi.gov.uk



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Dear Sir/Madam

Ref: Tackling the plastic problem - Using the tax system or charges to address single-use plastic waste'

NLWA is pleased to have the opportunity to respond to the government's call for evidence on tackling the problem of single use plastic through the tax system or charges.

NLWA is the joint waste disposal authority for north London established by the Waste Regulation and Disposal (Authorities) Order 1985. As a joint waste disposal authority NLWA is responsible for the disposal of waste collected from households and local businesses by seven north London boroughs – Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest, the 'constituent boroughs'. NLWA manages the residual waste from all seven boroughs, recyclable and compostable waste from six boroughs and all the north London reuse and recycling centres except in one borough. NLWA also delivers extensive behaviour-change campaigns in the fields of waste prevention and recycling.

Whilst we have reviewed all the consultation questions, we have confined our comments to the elements of the consultation that are relevant to a waste disposal authority in the capital. We also responded last year to the Defra 'Call for evidence on voluntary and economic incentives to reduce littering of drinks containers and promote recycling', namely the call for evidence on introducing a deposit return scheme or other recycling incentive scheme for drinks containers.

NLWA Comments

NLWA understands that this call for evidence is seeking to explore how changes to the tax system or charges could be used to reduce the amount of single-use plastic that we waste, in order to deliver better environmental outcomes including:

- Reducing the amount of single use plastic waste by reducing unnecessary production
- Driving innovation by stimulating businesses to develop and integrate new technology
- Encouraging growth in the recycling industry by addressing barriers to investment.

It is also clear from the foreword by the Chancellor of the Exchequer that the aim is to reduce the amount of single use plastic waste that is incinerated, sent to landfill or littered.

NLWA's experience with single use plastics waste includes managing single use plastic waste collected directly from households and as litter by our constituent boroughs and the subsequent management of recycling or waste disposal contractors (both incineration with energy recovery and landfill) who process the material. We also have experience of delivering a number of waste prevention initiatives aimed at reducing single use plastic waste including:

- Running information stalls to encourage north London residents to avoid single use plastic carrier bags when shopping in small retailers (who can still provide single use plastic carrier bags without a 5p charge attached).
- Working with small retailers to encourage them to give out reusable shopping bags rather than single use plastic ones.
- Running an incentive scheme to encourage parents to use reusable nappies rather than single use disposable ones. Disposable, i.e. single use nappies typically contain a polypropylene topsheet to protect against wetness and a polyethylene backsheet to prevent leakage.

Our response draws upon this experience where relevant.

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

1.1 The government defines single use plastics as follows:

"Single-use plastics includes all products that are made wholly or partly of plastic and are typically intended to be used just once and/or for a short period of time before being disposed of. Examples of items commonly recognised as single-use plastics include: takeaway boxes, disposable coffee cups, stirrers, plastic wrap, polystyrene packaging and cigarette filters."

1.2 Whilst we agree with the government's definition of single use plastic, a more refined approach will be required in order to define which products will be subject to the introduction of either taxation or charges to reduce single use plastic waste. It is also important to consider that the goal may not be to use a tax or charge to assist a switch in consumption from one product to an alternative but to reduce consumption and resource use altogether. In addition there will be some products for which a reduction in consumption could have a disproportionate impact upon particular groups and products which are important for health and wellbeing for example will be considered essential for all. Therefore taxation or charging may not be desirable for other reasons. Which products are included and which excluded from any taxation or charging regime is dependent on the objectives of the taxation or charge. The rest of this section (1) of our response considers some of the factors to take into account in developing an appropriate regime.

What are we trying to change by introducing a tax or charge?

1.3 When producer responsibility legislation was introduced it focussed on products for which consumption, and therefore waste, was increasing relatively rapidly with resultant environmental consequences. This approach resulted in a focus on packaging, electrical and electronic waste and batteries. These were also all products which ended up with the consumer in the home and therefore in the local authority collected waste stream too. The obligation for addressing the

environmental impact of the products was placed upon the producer through requirements for take-back, reuse and recycling. In the case of packaging producer responsibility, the packaging regulations also introduced an obligation for providing consumer information – the consumer information obligations.

- 1.4 With the introduction of the carrier bag tax on the other hand, the issue being addressed was not just an increase in waste, but there was also an understanding that the introduction of a tax on single use carrier bags could have a positive impact on reducing litter as well. The taxation income was used for charitable purposes and consumers also had a real choice of purchasing a reusable alternative to the single use product being targeted. With most obligated packaging for example, the consumer has little or no choice for selecting an alternative.
- 1.5 Several of the products listed in the consultation at paragraph 2.1, such as polystyrene packaging, plastic wrap and cigarette filters are more akin to the products targeted with producer responsibility requirements. However, other products listed such as disposable coffee cups and takeaway boxes have more similarities to the single use carrier bag in terms of their littering impact, and in the case of disposable coffee cups, having alternatives readily available for the consumer to choose.
- 1.6 So, whilst we acknowledge that single use plastic is a problem and support the introduction of interventions to reduce it, we think it is important for the government to consider the key focus of the intervention required and then select the obligated products accordingly. The government should also consider whether the most appropriate response to reducing single use plastic use for particular products is either taxation at the point of purchase (visible or not), or whether a producer responsibility regime is a more appropriate and possibly effective approach to the issue. Whichever route is adopted, the following points should be taken into account.

On what grounds are products included or excluded from the taxation regime?

- 1.7 We recommend that some additional products should be targeted because they clearly fall within the government's definition of single use plastics, although they are not currently included within the scope of products listed in the consultation document. Additions include single use pots, tubs and trays including things like flower pots.
- 1.8 However, other products which also clearly fall within the definition, should be excluded given the essential nature or legislative requirement for their use – single use plastic medical products would be an example.
- 1.9 Another less clear-cut example for exclusion from a charge or tax is dog poo bags. Dog owners have a legal duty to clean up every time their dog makes a mess in a public place¹ and can be given an on-the-spot fine if they don't clean up after their dog. Some councils have stricter rules on dog fouling. They may make owners carry a poop scoop and disposable bag when they take their dogs

¹ <https://www.gov.uk/control-dog-public/dog-fouling>

out to a public place. Should a levy or tax be added to these items when it is a requirement for dog owners to carry them and a requirement everywhere for dog owners to clean up the mess in order to reduce the negative environmental and health implications of having dog poo in public parks and spaces?

- 1.10 Similarly, single use products which provide another environmental benefit may not be appropriate for inclusion. Food wrapping for example can play a key role in reducing food waste because it prevents rapid product degradation, in a system where food is being stored and transported for much longer and much further than it was many years ago. The plastic wrap on a cucumber is often quoted in this regard in the light of the considerable extra shelf life that a plastic wrapping provides. A wrapped cucumber lasts more than three times as long as an unwrapped one. It will also lose just 1.5 per cent of its weight through evaporation after 14 days, compared with 3.5 per cent in just three days for an exposed cucumber.²
- 1.11 The Chancellor makes it clear in his introduction that the proposals for taxing or adding a charge to single use plastic should not be about placing unnecessary new burdens on business. Therefore, in the cucumber example above, there would be no suggestion of requiring distributors of farm produce to establish a more comprehensive network of smaller distribution centres in order to reduce transport distances so that cucumbers could be purchased much closer to the point of consumption thus avoiding the need for protective plastic wrapping. As a result the unintended consequence of including cucumber single use plastic wrapping within the charging regime for example could be that producers stop using it and consequently there is an increase in the number of cucumbers going to waste. Accordingly, the single use wrapping on a cucumber is likely to be a product for which there a legitimate case for exclusion from a new taxation or charging regime.

Genuine choice of an alternative

- 1.12 Any products included within the scope of the charge or tax should have a genuine, and similarly easily available, less environmentally damaging alternative for consumers to buy. In the case of single use plastic carrier bags for example, there was and continues to be a wide range of more durable reusable bags available. It is also still an option for the consumer to choose the single use alternative and pay the tax.
- 1.13 Our own research on the barriers to the uptake of reusable nappies in north London³ (single use, disposable nappies also contain plastic) suggests that lack of awareness of the reusable alternatives to disposable nappies is one of the foremost barriers to greater uptake of the reusable alternatives.

"I never really see them. I don't think I've ever seen them in shops."

Female Hackney resident talking about the availability of reusable nappies

² Why Shrink-wrap a Cucumber? The Complete Guide to Environmental Packaging, Stephen Aldridge and Laurel Miller

³ Exploring the barriers and motivations around the use of real nappies by north London residents, ComRes, May 2018)

- 1.14 In the case of reusable nappies, extra effort is required to search out the choice of products available and where you can buy them, disposables on the other hand are in the baby products aisle of every supermarket. Our research suggests for example that "In general parents-to-be are unlikely to have reusable nappies on their radar as a viable option." even before other factors such as up-front-cost or usage concerns and barriers are considered.

2. Question 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 offer similar benefits?

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

- 2.1 NLWA cannot comment generally upon product alternatives to single use plastic. The only comment we can make in this regard is that in relation to biodegradable plastics there are difficulties with separately extracting biodegradable plastic for composting for example within the currently recycling collection and processing system.

- 2.2 There are two types of biodegradable plastics:

- ones which are made from plant-based materials (known as bioplastics) and
- those that are made from petrochemicals with chemical additives that allow them to break down faster.

Due to their chemical composition biodegradable plastics cannot be recycled into new plastic products, and only bioplastics can be composted (in the right conditions). However, with both types of biodegradable plastic there is a difficulty of identifying them for separate handling and processing because they may not look any different to other types of plastic and are therefore difficult to identify. The collection systems and recycling machinery used to sort recyclables currently would not be able to separate them out for a different next use.

- 2.3 We have been asked by residents if we can accept biodegradable plastic for recycling in north London and the answer is 'no' at the moment. The only type of biodegradable plastic that we do accept is compostable food caddy liners which carry the 'seedling logo' (which means they conform with the relevant standard BS EN 13432). We can only accept liners with the seedling logo, as these will break down during the composting process and they are relatively easy to identify as they will be included in the food waste collection system, rather than being mixed in with other types of plastic in the mixed recycling waste stream.
- 2.4 Despite the north London authorities having collected plastics for recycling for many years it is still more challenging to encourage residents to recycle plastics than some other materials such as glass. Our resident attitudinal surveys in north London consistently say that plastic is the recyclable product about which they are most unsure. This confusion about what to do with plastic waste can also be seen in the low national capture rates for plastics too relative to other recyclable materials.

- 2.5 Finally, from a waste hierarchy perspective, substituting compostable bioplastics for single use recyclable plastic, doesn't move this waste stream up the waste hierarchy, it simply changes the processing route. If the government wants to take decisive action on single use plastics, including reducing litter, it would be much better to encourage a move away from single use and throwaway materials and instead to encourage a much greater use of reusable products and the minimisation of plastic waste, including packaging. This can only be achieved through a range of measures including legislation, financial drivers and behaviour change communications to normalise the use of reusable alternatives.

3. Question 13 - What factors influence consumers' choices related to single-use plastic items? How can the government encourage the re-use of these items?

- 3.1 The widespread use of single-use plastic items indicates the level of appeal, particularly compared to reusable alternatives; single use plastic items are generally cheap, convenient and readily available. They are perceived as the 'norm'.
- 3.2 NLWA's work on encouraging the uptake and use of reusable carrier bags with shoppers going into smaller retailers or onto market stalls provides some insights. Following some early years providing reusable bags to shoppers, our approach in more recent years has moved to encouraging shoppers to remember their reusable bag every time, i.e. to maximising the use of the reusable alternative.

Give the Bags a Break

- 3.3 The aim of the NLWA 2017-18 reusable bag project was to reduce the use of single use plastic bags in north London. The project took inspiration from a Street campaign for reusable bags⁴ that had been undertaken in Brussels.
- 3.4 Through the Give the Bags a Break project, officers worked with small retailers and their customers to encourage reduction of single use plastic bags. Seven large events took place in north London throughout February 2018. Prior to the events, officers held discussions with the retailers as to how the message could be best communicated to their customers and offered promotional posters for their shop.
- 3.5 During the events, officers offered passers-by free reusable bags and encouraged them to complete a survey about their bag habits. Those that completed the survey were entered into a prize draw to win Sea Life London Aquarium tickets.
- 3.6 Seven events were delivered, directly engaging with 736 residents; 1,100 bags (an average of 157 per event) were handed out and 64 residents entered into a prize draw.

⁴ For information on the project in Brussels see the two short films that were produced as result:

In Dutch: <https://vimeo.com/204008237>

In French: <https://vimeo.com/204008322>

- 3.7 Results from the survey indicate that **99%** (132 respondents) said they already use reusable bags, while only **1%** (2 respondents) said they did not use reusable bags. Out of the participants who used reusable bags, **50%** (65 respondents) said they always use their reusable bags, whilst a further **6%** (8 respondents) said they used them every time they shop, **21%** (27 respondents) stated they almost always use reusable bags.

From the questionnaire results residents' motivations for using reusable bags show that:

81% (107 respondents) choose reusable bags because of the impact on the environment,

40% (53 respondents) stated money savings as the reason and

19% (25 respondents) because of convenience.

- 3.8 It is interesting however, that although nearly everyone we spoke to said that they already use reusable bags, only half are using them all of the time. The motivations are there to use reusables, but for half of those spoken to, the motivations are insufficient or other factors are more overwhelming; so that they don't choose the reusable alternative every time.

- 3.9 In terms of the factors that influence consumers' choices regarding nappies, i.e. whether to buy single use or reusables, our research in north London (albeit with a very small group of parents/carers) shows that:

- Single use products are the norm and therefore an awareness and knowledge deficit remains around the name and details regarding purchasing and using reusable products.
- With so much unknown about the reality of using reusable nappies, and the upfront cost of them, an opportunity of trialing reusables may be useful in helping to influence consumer choice.
- The timing of any communication about reusable alternatives is important. For more people to be interested in using reusable nappies, this would ideally be addressed some time before the birth so that parents can fully prepare – financially, mentally and physically – to use reusable nappies. It requires pre-planning to move to use reusables.
- Promotions such as a money-off voucher to encourage a trial of reusables and drop-in sessions or Nappuccino sessions that enable spending of vouchers and provide the opportunity to ask questions may provide a useful trigger to encourage new users to give reusables a try.
- Environmental concerns may be sufficient to convince some people to try reusable nappies, but these arguments alone fail to convince the majority of parents as convenience remains an overriding factor. Encouragement such as highlighting the number of other people using reusable nappies or the amount of resources that can be/have been saved are positive messages and less likely to provoke defensive reactions than guilt-laden communications about how much is ending up in landfill. Furthermore, the increase in media coverage around use of plastics may yet boost interest in more ecologically friendly nappies. Highlighting the natural or eco-credentials of the material may also persuade some parents that reusable nappies could be a better option for their child.
- Another factor that may influence consumer choice between disposable and reusable nappies is stressing through communications that a 'mix and match' approach is 'allowed'. So rather than apparently advocating use of

reusable nappies alone, giving the suggestion that using disposables some times and reusables at others is helpful, acceptable and a common, normal approach used by other parents. This will help overcome many of the concerns expressed by parents about what to do in the first few months/when out of the home or when children are looked after by others

- The idea of saving money obviously appeals, but our research showed that this message was not a driver for parents due to uncertainty around the savings and perceptions of reusables being an expensive product given the initial outlay required. Many parents are turning to supermarket own brand nappies to make savings and do not see nappies as a big cost compared to other areas of spending. As such it is unlikely to be the motivating factor behind switching to reusable nappies. For those interested in reusable nappies but concerned about cost, the combination of the voucher as a 'free trial' and second-hand markets may help to encourage a full switch, and many interviewees seem open to the idea of a trial.
- Advice or recommendations are often most trusted from other parents who have recently been through similar situations. Building a network of parents who can endorse reusable nappies and support others in their use is therefore the best mechanism for spreading the word. This also helps to 'normalise' use of reusable nappies, and communications showing parents that 'people like them' use reusable nappies could foster greater acceptance.
- New parents frequently use online searches, but they often search online with very specific queries – also, parents are often looking for a discussion rather than a specific answer. Nevertheless, our own advertising campaigns have shown that online advertising can be effective in driving online traffic to a website about reusables, but that the information on a website alone will not be enough to convince parents to switch to reusables.

- 3.10 Other single use/reusable choices will have a different range of factors influencing the decision, but at least some of the decision-making factors could be similar to the above.

Government intervention to encourage reuse

- 3.11 In terms of how the government can best encourage the re-use of these items the introduction of extended producer responsibility (EPR) to single use plastic products would help to address the problem, noting as outlined in paragraphs 1.3 – 1.6 that the mechanism for intervention will depend on the over-arching objective.
- 3.12 We are aware that there may also be the opportunity to consider a combined approach using EPR with a supporting tax or surcharge if necessary. We would support any such suggestions from others in this regard.
- 3.13 The other intervention from the government to further encourage re-use is to ensure that consistent communications messages are provided to the consumer and that the signals sent by any financial penalties or incentives are consistent too. It should be clear to consumers that reuse is preferable to recycling of single use items. With plastic carrier bags the differential in prices between a single use carrier bag, and a 'bag for life' or something much more sturdy such as a woven or hessian bag sends a clear preferential pricing signal to the consumer. Although the pricing of the three different products listed above will vary from

retailer to retailer, because the government has set the price of the least desirable single-use product by adding a tax to it, this provides a consistent pricing signal for the least desirable of bags across the country. This type of consistency would be useful for other single use products too. Consumer information obligations should also be used and enforced in order to encourage uptake.

4. Question 14 - What are the barriers to consumers choosing alternatives to single-use plastic items, and how responsive would consumers be to price changes?

- 4.1 From both our own work and national work on encouraging a move away from other single use plastic products, namely plastic carrier bags and disposable nappies some of the following conclusions may be relevant and transferrable as barriers to the uptake of alternative reusable products in other situations:
- 4.2 Firstly according to WRAP⁵, the barriers to the uptake of reusable nappies can include:
- Inconvenience, mess and time issues (relative to single use disposable nappies);
 - Up-front costs of buying reusables;
 - Lack of understanding of the different types of alternative reusable products;
 - Perceptions of the negative impacts around water, detergent and energy use in the laundry process; and
 - Product quality issues with the reusable alternatives, namely leaking and increased nappy rash.
- 4.3 NLWA's own research into exploring the barriers and motivations around the use of reusable nappies by north London residents (ComRes, May 2018) confirms the WRAP findings and concludes that the following are barriers to replacing single use disposable nappies with reusable ones:
- *Lack of awareness and knowledge* – which resulted in lots of questions being raised by research interviewees including:
 - Where would you put the reusable nappies before they are washed?
 - How many (reusable nappies) would you need if you switched over from disposables to reusables?
 - What would you do in different situations? e.g. when out of the home or taking the baby to other carers?
 - *Normalisation* - going hand in hand with awareness is the idea of what is 'normal'. Normal products are available in the shops and widely used. Reusable nappies do not fall into these categories.
 - *Practicality and convenience* - including perceptions of hassle – as one Camden resident commented:

⁵ <http://www.wrap.org.uk/content/planning-real-nappy-campaign>

"It's important obviously because I'm part of the environment and I'm a product of my environment, but practicality always prevails, you know, and that's the honest truth... Even though I'm using 6,000 or 4,000, it's like they were 6,000 practical nappies. I needed each one, you know."

Male, 18-24, Camden

- *Extra work* – particularly laundry. There is a perception that reusable alternatives to single use products will create more work.
- *Storage barriers* - at least half of the north London residents interviewed in our research were worried about the smell and inconvenience of having to carry around or store soiled nappies.
- *Convenience* – non-users had generally not considered that there may be times when you would want to use a disposable nappy as well, so that 'mixing and matching' reusables and disposables was a practical option to overcome barriers of convenience.
- *Staining* - the idea that reusables could remain stained after first use was also offputting for some, i.e. there was a perceptual barrier that the reusable product would not appear as pristine and new as the single use alternative.
- *Financial barriers* – NLWA research also investigated perceptions of the upfront cost of reusables as a barrier to change versus the financial saving over two or three years resulting from not having to buy single use disposables. Our research found that although financial considerations are unlikely to be decisive in changing behaviour, the upfront cost of investing fully in reusable nappies provides a significant barrier for many parents. Spending significant sums of money in one go on nappies is not an expected cost, and most respondents indicated that they would not have the resources to do this and/or would prefer to pay for nappies as they needed them each week or month.

5. Conclusion

- 5.1 In conclusion, NLWA is supportive of government intervention to reduce the amount of single-use plastic waste which is currently thrown away and welcomes the opportunity to input to the debate at this stage. It would be helpful for further consideration of the objectives of the intervention to be undertaken and then the design of the intervention and modelling of the potential impacts and any unintended consequences can be more fully considered. We would also welcome the opportunity to input further into this useful and interesting debate and given the extent of our waste prevention activity would be most willing to consider whether we could trial any interventions locally prior to wider rollout.

Yours faithfully



Martin Capstick
Managing Director

Cc: Chris Preston, Defra