

Response ID ANON-N5QQ-VH9D-Z

Submitted to **Consultation: Introducing market restrictions on single-use plastic items in Scotland**

Submitted on 2021-01-04 10:43:48

Consultation Questions

1(a) Do you support the proposal to introduce a market restriction in Scotland on each of the single-use plastic items listed and all oxo-degradable products?

Question 1(a) - Single-use plastic cutlery (forks, knives, spoons, chopsticks):

Yes

Question 1(a) - Single-use plastic plates (plates, trays/platters, bowls):

Yes

Question 1(a) - Single-use plastic straws:

Yes

Question 1(a) - Single-use plastic beverage stirrers:

Yes

Question 1(a) - Single-use plastic balloon sticks:

Yes

Question 1(a) - Single-use food containers made of expanded polystyrene:

Yes

Question 1(a) - Single-use cups and other beverage containers made of expanded polystyrene, including their covers, caps and lids:

Yes

Question 1(a) - All oxo-degradable products:

Yes

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

Please enter text here:

RMAS supports the ban on single-use plastic products in line with Article 5 of the Single Use Plastics Directive.

In general these items are unlikely to be separated, for recycling, by the user, along with being too small to consolidate and mechanically separate through formal waste/water management systems, and contribute to terrestrial litter and marine pollution when they leak out of the system (representing a market failure).

Clearly it would be preferable if reusable products were used instead of single use items, however, if alternative materials are used in a single use context to replace single use plastic products these should be recyclable and should be appropriately labelled to detail preferred routing within the waste management system. There should also be appropriate educational information made available to users to direct them to the preferred treatment/ recovery route.

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

Please enter text here:

Yes, whilst a non-commercial ban could be implemented, this would require the enforcement of regulations. It is understood this may fall onto either Trading Standards or SEPA. It is not clear from the consultation what additional resources or funding would be made available for this. Adequate resourcing is considered a critical element to ensure that the enforcement role is carried out and the regulations are properly implemented.

A commercial ban on single use plastic items could restrict the availability of single use plastic items for use in a non-commercial capacity.

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.

Please enter text here:

We have no specific data on the extent of oxo-degradable products on the market. However, these products are not recyclable and contaminate other polymers when disposed of through the general plastic recycling waste stream. They also lead to confusion among consumers and retailers.

In household waste and in most catering contexts, small single use items are less likely to be separated by the user, and are too small to consolidate and mechanically separate – regardless of the end treatment destination. Separation and/or collection of small single use items made of any material is, therefore, likely to be unfeasible on the grounds of practicability and cost. In addition, where leakage into the environment occurs, most biodegradable plastics may not break down fast enough and can still be ingested by wildlife. On this basis we support the ban of these materials.

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

Please enter text here:

We are not aware of other exemptions that should be considered.

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?

Please enter text here:

RMAS believes that exemptions will be essential for medical, disability-related and other special uses.

RMAS suggests that potential essential users such as the medical profession are specifically consulted on this matter.

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

Please enter text here:

In principle RMAS supports further market restrictions. As well as the items listed there are multiple single use plastic items such as free plastic toys, badges, novelty items, single use lighter, multi pack rings, bottle loops and caps, plastic trays etc. However, these should be considered individually in details to ensure there is balance with respect to social environmental and financial impact of removing them. Where alternatives are suggested the focus should be on circular solutions rather than a change of materials and a continued linear stream.

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.

Yes

Please enter text here:

The Environmental Impact Assessment details scenarios where single use plastic are replaced with alternative materials. Whilst this provides a potential worst case scenario the focus should remain on providing replacements that fit into the circular economy rather than linear solutions. This does not come across well in the Assessment.

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.

No

Please enter text here:

COVID-19 restrictions are likely to have limited most materials on the proposed ban. However, it is unlikely that the COVID-19 pandemic has resulted in any relevant material changes to the market that would undermine the viability of, or case for the ban.

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?

Please enter text here:

No further comment.

Environmental Report

1 To what extent does the Environmental Report set out an accurate description of the current baseline and the business as usual scenario?

Please give details of additional relevant sources.:

As detailed previously The Environmental Impact Assessment details scenarios where single use plastics are replaced with alternative materials. Whilst this provides a potential worst case scenario the focus should remain on providing replacements that fit into the circular economy rather than linear solutions. This does not come across well in the assessment.

Finally the assessment assumes this material is collected and disposed of. This may not always be the case.

2 Do you think that the Environmental Report has correctly identified the likely significant effects of the proposed restriction on single-use and oxo-degradable plastics placed on the market in Scotland?

Please enter text here:

The Environmental Report has correctly identified that alternative are likely single-use and not widely recycled in Scotland. Given the lack of treatment capacity this is not surprising.

3 Do you agree with the recommendations and proposals for mitigation and enhancement of the environmental effects set out in the Environmental Report? (If not, what do you think should be the key recommendations and why?)

Yes I agree

Please enter text here:

No further information to add.

4 Are you aware of any further information that will help to inform the findings of the assessment? (Please give details of additional relevant sources)

Please enter text here:

No further information to add.

5 Do you agree with the proposed arrangements for monitoring the significant effects of the proposed restriction? (If not, what measures do you propose?)

Yes I agree

Please enter text here:

Monitoring should also look at ensuring alternatives are as far as possible reusable or recyclable rather than be single use alternative items.

About you

What is your name?

Name:

Hamish Martin

What is your email address?

Email:

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Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:

SRMA (Scotland) Limited trading as the Resource Management Association Scotland

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response only (without name)

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes

I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.

I consent

Evaluation

Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Very satisfied

Please enter comments here.:

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Very satisfied

Please enter comments here.: