Number: WG40193



Welsh Government
Consultation Document

# Reducing single use plastics

Proposals to ban nine single use plastic products in Wales

Date of issue: 30 July 2020

Action required: Responses by 22 October 2020

Mae'r ddogfen yma hefyd ar gael yn Gymraeg. This document is also available in Welsh.



#### Overview

We are making the transition to a circular economy to ensure we do not use more than our fair share of the world's resources. Reducing our consumption of single use items is an integral part of this move. We also aim to have a litter free Wales. To support this, we need to phase out the use of unnecessary, highly littered, single use plastic. We welcome your views on our plans to help achieve this through banning a number of commonly littered single use plastic products found in our seas and on our beaches.

#### How to respond

You can respond to this consultation by answering the questions on the form available at www.gov.wales/consultations. You can also submit responses and provide comments by post or email. Contact details are below.

# and related documents

Further information This document is available at www.gov.wales/consultations.

> Large print, Braille and alternative language versions of this document are available on request.

#### **Contact details**

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This document is also available in Welsh

https://llyw.cymru/ymgyngoriadau

#### **General Data Protection Regulation (GDPR)**

The Welsh Government will be data controller for any personal data you provide as part of your response to the consultation. Welsh Ministers have statutory powers they will rely on to process this personal data which will enable them to make informed decisions about how they exercise their public functions. Any response you send us will be seen in full by Welsh Government staff dealing with the issues which this consultation is about or planning future consultations. Where the Welsh Government undertakes further analysis of consultation responses then this work may be commissioned to be carried out by an accredited third party (e.g. a research organisation or a consultancy company). Any such work will only be undertaken under contract. Welsh Government's standard terms and conditions for such contracts set out strict requirements for the processing and safekeeping of personal data.

In order to show that the consultation was carried out properly, the Welsh Government intends to publish a summary of the responses to this document. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response. If you do not want your name or address published, please tell us this in writing when you send your response. We will then redact them before publishing.

You should also be aware of our responsibilities under Freedom of Information legislation

If your details are published as part of the consultation response then these published reports will be retained indefinitely. Any of your data held otherwise by Welsh Government will be kept for no more than three years.

#### Your rights

Under the data protection legislation, you have the right:

- to be informed of the personal data held about you and to access it
- to require us to rectify inaccuracies in that data
- to (in certain circumstances) object to or restrict processing
- for (in certain circumstances) your data to be 'erased'
- to (in certain circumstances) data portability
- to lodge a complaint with the Information Commissioner's Office (ICO) who is our independent regulator for data protection.

For further details about the information the Welsh Government holds and its use, or if you want to exercise your rights under the GDPR, please see contact details below: Data Protection Officer:

Welsh Government Cathays Park CARDIFF CF10 3NQ

Email: Data.ProtectionOfficer@gov.wales

The contact details for the Information Commissioner's Office are:

Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Tel: 01625 545 745 or 0303 123 1113

Website: https://ico.org.uk/

# Foreword by the Deputy Minister for Housing and Local Government

The issue of plastic waste and the impact it has on our environment is regularly highlighted in the media, online and in conversations I have every day with people across Wales. Single use plastic items make up a significant proportion of litter on our streets, parks and seas. It blights our communities and has a devastating impact on our wildlife.

During the different and difficult period of the COVID-19 lock-down, many people had a rare opportunity to rediscover and gain a greater



appreciation of our local areas and communities. Overall, many people benefited from reduced littering. However, with restrictions easing, littering has become more prominent.

Strong and proud communities are at the heart of Welsh life and, when it comes to reducing plastic and litter, our communities have led the way. Across the country, we have seen towns, cities and coastal and rural communities choosing to go 'Plastic Free'. Volunteers have worked alongside local councils and charities to remove plastic from our supply chains and environment.

Tackling our over-use of single use plastics is an issue which has been championed by many young people. They have organised several campaigns, including the Welsh Youth Parliament's recent work on littering and plastic waste. Our proposals aim to build on this. We want to change consumer behaviour towards using fewer single use items and enhance our global reputation as an exemplar in recycling.

With consumer behaviour changing, there is more demand for sustainable products which do not harm our environment. I want our businesses to lead the way in meeting this challenge, enabling them to thrive whilst delivering benefits to society and the environment. I welcome the innovative changes already demonstrated by a range of businesses in Wales to use less single use plastic items and more recycled materials. However, we must go further. This consultation sets out our proposals to ban a number of single use plastic items for which non-plastic alternatives exist. These items are commonly littered and not essential.

I hope you take the opportunity to respond to the consultation and help us reach our goal of making Wales a nation which takes responsibility for what it consumes and uses no more than its fair share of the World's resources. Together, we can make a difference and create a better environment for current and future generations in Wales.

Hannah Blytun

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#### Our ambition

- 1. In the twenty years since devolution, Wales has transformed from a nation which recycled less than 5% of its municipal waste, to an international leader that recycles 63%. In addition, we have led the way by becoming the first country in the UK to introduce a charge for the single use of carrier bags. We want to build on this success by continuing to explore alternative and innovative approaches to phasing out single use plastics.
- 2. We want Wales to become a nation where resource efficiency is part of our culture, where we recognise the value of our resources and reduce the quantity of waste that arises. We published a consultation document, Beyond Recycling<sup>1</sup>, late last year which actively engaged the people of Wales on the pathway we should take to a more circular economy that keeps resources in use for as long as possible and that eliminates waste. This included phasing out single use plastics and sending zero plastic waste to landfill.
- 3. The consultation sets out proposals for banning nine single use plastic items. This is a key step on our pathway to phasing out single use plastics.
- 4. This consultation sits alongside a broader range of interventions underway to eliminate waste, including littered waste. These include:
  - legislation for an extended producer responsibility (EPR) scheme for packaging,
  - a UK-wide plastic packaging tax to encourage the greater use of recycled plastic,
  - exploring the possibility of a Welsh tax or charge on single-use plastic cups to drive demand away from such items, and
  - building on the success of our single use carrier bag charge, with steps to address consumption of other types of bag.
- 5. Eliminating single use plastic items from the waste stream is an integral part of our plans to tackle littering. In 2019, a Welsh Government study<sup>2</sup> into the composition of litter waste in Wales found that 61% of all the litter waste by weight collected and analysed could have been recycled using existing recycling systems either at home, bring banks, on-the-go recycling bins or at recycling centres. This accounted for an

<sup>&</sup>lt;sup>1</sup> Circular Economy Strategy, *Beyond Recycling* consultation: Welsh Government, 2020 - <a href="https://gov.wales/circular-economy-strategy">https://gov.wales/circular-economy-strategy</a>

<sup>&</sup>lt;sup>2</sup> Composition analysis of litter waste in Wales: Welsh Government, 2019 - <a href="https://gov.wales/composition-analysis-litter-waste-wales">https://gov.wales/composition-analysis-litter-waste-wales</a>

- estimated 15,683 tonnes of recyclable litter material over the year. This is a significant amount of potentially valuable resources being lost from the system by either entering the environment as litter or being sent to landfill.
- 6. Litter is also a key concern in our communities and one we are determined to tackle. During the recent COVID-19 lock-down, many people rediscovered and gained a greater appreciation for their local areas. Overall, many communities benefited from reduced littering. However, as restrictions eased, littering has become more prominent in our streets, parks and beaches.
- 7. Our ambition is for a litter free Wales. We already have a Marine Litter Action Plan (MLAP) 2020-23³ which has prevention as its core principle and supports our vision of clean, healthy, safe, productive and biologically diverse seas. We are also developing an additional Litter Prevention Plan during this Welsh Parliament term to tackle littering in local communities. Everyone has a role to play and we are working with a range of partners on a number of initiatives to drive behavioural change, particularly in places where littering is a continual problem. This includes working with fast food retailers on options for reducing the volume of food packaging that is littered.

## Our proposals

#### Why must we take action to address single use plastics?

- 8. Plastic, when well designed and necessary, can play an important role in our economy and daily lives. However, its use has become so widespread, people often place little or no value on it as a resource and so it is often disposed of after one use, is not recycled or is simply littered. This is particularly true of smaller items that cannot easily be picked up. These items are then washed into our seas and onto our beaches. In 2018, research<sup>4</sup> undertaken by the European Commission found that 80 to 85% of marine litter, measured by beach litter surveys, is plastic, with single-use plastic items representing 50% of the total.
- 9. The research found most littered items on European beaches were those associated with "on-the-go" food and drink packaging, whilst others had entered the sea via the sewerage system. However, as plastic can break down over time into smaller pieces it can make it difficult to identify its origin. Of those that were identifiable, the main items were:
  - plastic stemmed cotton buds
  - cutlery
  - plates
  - beverage stirrers
  - straws
  - sticks for balloons
  - food containers made of expanded polystyrene
  - cups for beverages made of expanded polystyrene
- 10. Studies in Wales suggest single use plastic litter is prevalent in our local environment. For example, the recent Welsh Government compositional analysis of litter found plastic items in 40% (by item count) of the total sample analysed. Welsh beach and street cleanliness surveys have confirmed the presence of many of the items found by the European Commission's research. The Marine Conservation Society's Great British Clean weekend in 2019<sup>5</sup> found there was an average of 322 plastic items per 100 metres of beach surveyed. Keep Wales Tidy found fast food litter on 20% of the streets they surveyed across Wales in their 2018-19 Street Cleanliness Survey<sup>6</sup>.

<sup>&</sup>lt;sup>4</sup> Reducing Marine Litter: action on single use plastics and fishing gear – Impact Assessment: European Commission, 2018 - <a href="https://ec.europa.eu/environment/circular-economy/pdf/single-use-plastics-impact assessment.pdf">https://ec.europa.eu/environment/circular-economy/pdf/single-use-plastics-impact assessment.pdf</a>

<sup>&</sup>lt;sup>5</sup> Great British Beach Clean Report: Marine Conservation Society, 2019 - https://www.mcsuk.org/news/great-british-beach-clean-2019-report

<sup>&</sup>lt;sup>6</sup> Keep Wales Tidy – How Clean Are Our Streets, 2019 report: https://kwt.eu.rit.org.uk/Handlers/Download.ashx?IDMF=25600629-fd94-4f62-9d8c-f6579a0da8e0

- 11. Once in the marine environment, plastic can accidently be eaten by marine animals, potentially causing harm if it builds up in their digestive systems. The presence of large amounts of littered plastic on our coastlines can also have a negative visual impact, which can deter tourists and affect our coastal communities and their economies.
- 12. Many single use items are provided to consumers at low, or no cost, with an accompanying purchase of food or drink. These items are very small and are of low individual value, both to the end consumer and the retailer. The cost and effort of separating, cleaning and processing them for recycling is, therefore, deemed to not be worthwhile. Consequently, a high volume of these products are discarded into general waste, either by the end consumer or the retailer, or are littered. There are, therefore, associated external costs in relation to these products which are not reflected in the price of the product to the consumer. This provides an economic rationale government intervention to address this market failure.
- 13. We welcome the voluntary measures taken by communities and businesses to move away from unnecessary single use plastics. However, it is clear the progress being made is too slow and without an intervention to remove low cost, low value but highly damaging plastics from the market we will not effectively tackle the issue of litter and plastic pollution. We need to build on these initiatives with action to accelerate the shift away from such items.
- 14. The recent COVID-19 situation highlighted the need for disposable personal protective equipment to help prevent the spread of disease and to protect our communities. However, this has not changed the need to make the shift away from most single use plastic items.

#### Single use plastic items we propose to ban

- 15. We propose to introduce secondary legislation to ban businesses from providing certain single use plastic items to end users (consumers) in Wales, irrespective of whether those businesses intend to charge for those items or not.
- 16. These items are aligned with those included in Article 5 of Directive (EU) 2019/904, the European Union's Single Use Plastic Directive. They are:
  - Item 1 plastic stemmed cotton buds
  - Item 2 cutlery (including knives, forks, spoons, sporks and chopsticks)
  - Item 3 plates (including trays, platters, bowls and laminated paper plates)
  - Item 4 beverage stirrers
  - Item 5 straws
  - Item 6 sticks for balloons
  - Item 7 food containers made of expanded polystyrene
  - Item 8 cups for beverages made of expanded polystyrene
  - Item 9 oxo-degradable products (plastic products which break down by oxidation into micro-fragments) Examples include carrier bags, agricultural mulch films and, most recently, certain plastic bottles.
- 17. We believe a ban will accelerate the shift away from these problematic single use plastic items. It will encourage businesses to move towards making more reusable, more easily recyclable and less environmentally harmful alternatives. It will also help shift consumer behaviour away from using so many single use plastic items.

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

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

- 18. In 2019, we commissioned research to help understand the potential impacts of introducing a ban on these items<sup>7</sup>. The research estimated the volumes of each product being sold and examined the availability and cost of non-plastic alternatives. The study used this information, together with findings about whether or not any plastic or alternative items were being manufactured in Wales, to estimate the potential economic impacts of the proposals on manufacturers and businesses in Wales.
- 19. The research concluded there were potential financial costs for plastics manufacturers if they chose to produce the same products using different materials. For example, for the purchasing of new equipment. There was also a potential small financial cost to the hospitality sector when purchasing non-plastic alternative stock, which were found to be slightly more expensive. It suggested consumers, may, therefore, be required to pay a small amount extra for some food or drink products that are consumed "on-the-go" (for example, take-away food) if retailers were to choose not to absorb these costs themselves. However, the study found the wider environmental and social benefits from reduced littering outweighed these small costs.

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

20. The impact assessment report acknowledged the findings may be limited by the data that could be gathered during the study period. Comprehensive and accurate market data were not available to determine the quantity and price of each product placed on the market each year. Estimates were made based on published data, market research, stakeholder and industry information and similar research undertaken on behalf of Defra<sup>8</sup>. The study identified a limited number of businesses manufacturing these products in Wales. It also identified potential economic benefits for Wales with increases in the sale of alternative products, especially if Welsh manufacturers responded to the demand for these items.

<sup>&</sup>lt;sup>7</sup> Impacts of a ban or restrictions in sale of items in the EU's single use plastics directive: Welsh Government, 2019 - <a href="https://gov.wales/impacts-ban-or-restrictions-sale-items-eus-single-use-plastics-directive">https://gov.wales/impacts-ban-or-restrictions-sale-items-eus-single-use-plastics-directive</a>

<sup>&</sup>lt;sup>8</sup> Assessing the economic, environmental and social impacts of a potential ban on plastic straws, plastic stem cotton buds and plastic drinks stirrers: UK Government, 2018 - <a href="https://consult.defra.gov.uk/waste-and-recycling/plastic-straws-stirrers-and-buds/">https://consult.defra.gov.uk/waste-and-recycling/plastic-straws-stirrers-and-buds/</a>

Question 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.

- 21. Our study examined the environmental impacts of switching to reusable products. It looked at the availability of reusable products consumers would carry with them, for example, reusable cups or bamboo cutlery. It also reviewed existing lifecycle analysis studies which compared the impact on the environment of washing reusable items compared to that of single use plastic products. When the differences in measurement methods were accounted for, reusable cutlery and crockery came out favourably compared to single use items. The study concluded where it is possible to use them, reusables are preferable to single use products of any material from an environmental impact point of view.
- 22. We are particularly mindful our research data was more limited in relation to oxodegradable plastics than for other items and would welcome additional evidence in relation to the products to enable us to make a more complete assessment of their use in Wales.

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

23. The research was undertaken prior to the COVID-19 pandemic, which may have resulted in a changing picture for single use plastic since our research was carried out. However, we feel it is reasonable to assume that any disruption in respect of items being considered here will be relatively short term. We would welcome views on whether there have been any disruptions of the market for single use plastic items following the emergence of COVID-19 that you feel are not reflected in our research findings.

Question 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.

24. The full research report can be accessed on our website<sup>9</sup>. However, an overview of each proposed single use plastic item is provided in **Annex A** at the end of this consultation document.

<sup>&</sup>lt;sup>9</sup> Impacts of a ban or restrictions in sale of items in the EU's single use plastics directive: Welsh Government, 2019 - <a href="https://gov.wales/impacts-ban-or-restrictions-sale-items-eus-single-use-plastics-directive">https://gov.wales/impacts-ban-or-restrictions-sale-items-eus-single-use-plastics-directive</a>

#### **Exemptions to avoid disproportionate impacts of single use plastic bans**

- 25. We recognise when banning any item, there is the potential for disproportionate adverse impacts in certain limited circumstances. We consider an exemption from the proposed bans may be warranted where:
  - a specified group of individuals finds the established non-plastic alternatives to certain banned items particularly impracticable; or
  - a specified setting or application may be particularly unsuited to the established non-plastic alternatives to certain banned items; and
  - there is no other reasonable mitigation that can be applied to address that disproportionate impact.
- 26. Exemptions need to be clear and practicable to apply so as not to undermine the policy objectives we are trying to achieve.
- 27. Based in our research, we believe the criteria set out at paragraph 25 above may be met in relation to single use plastic straws which are medical devices/used for medical purposes. We also think there may be merit in providing an exemption for the following:
  - The use of single use plastic straws in a care setting, such as a hospital or care home. This is because of the particular vulnerabilities of people in these settings that can be linked not just to medical care but also to age, which is a protected characteristic.
  - The use of plastic straws by those people with a disability, which, like age, is a protected characteristic.

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

Question 7 – Are there other exemptions we should consider in relation to all of the single use plastic items in our proposal? If so, please provide evidence to support this view.

#### **Transitional arrangements**

- 28. Our priority is to introduce a ban at the earliest possible opportunity, to prevent the ongoing damage we know these products are doing to the environment.
- 29. We recognise businesses will need to transition prior to the ban to adapt their supply chains and utilise existing stocks of single use plastic items. Our aim is to communicate the outcome of this consultation early in 2021 and bring the bans into force, subject to any exemptions, in autumn 2021.
- 30. During the consultation period we will undertake extensive discussions with stakeholders to understand what is needed to support transition to single use plastic bans. We will ensure businesses have clear timescales and sufficient guidance on this matter as we transition to the ban.

Question 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.

#### **Enforcing the bans**

- 31. In order to enforce bans, we propose a civil sanctions regime which will allow the regulator to use enforcement notices and variable monetary penalties. These sanctions are set out in Part 3 of the Regulatory Enforcement and Sanctions Act 2008<sup>10</sup>. This regulatory approach has been adopted in other similar environmental interventions in Wales. For example, the ban on plastic microbeads in personal care products<sup>11</sup>. We believe these civil sanctions will provide for a flexible and proportionate approach to enforcement.
- 32. We propose for Local Authorities to carry out this enforcement role, given their experience enforcing broadly similar, existing requirements.

Question 9 - Do you agree with the proposed use of Civil Sanctions?

**Question 10 - Do you agree Local Authorities should enforce the bans?** 

<sup>&</sup>lt;sup>10</sup> Regulatory Enforcement and Sanctions Act 2008 - <a href="https://www.legislation.gov.uk/ukpga/2008/13/part/3">https://www.legislation.gov.uk/ukpga/2008/13/part/3</a>

<sup>&</sup>lt;sup>11</sup> The Environmental Protection (Microbeads) (Wales) Regulations 2018 - <a href="http://www.legislation.gov.uk/wsi/2018/760/contents/made">http://www.legislation.gov.uk/wsi/2018/760/contents/made</a>

33. In the first instance, we are keen for enforcing authorities and those businesses affected by the bans to work together to resolve any issues voluntarily wherever possible. We believe education and guidance should normally be the first response, but formal enforcement and sanctions will be made available so they can be used where circumstances warrant it.

## **Future developments**

- 34. The proposals set out in this document are a first key step in removing single use plastics from the consumer chain in Wales.
- 35. As new products are developed and become established in the market to replace other single use plastic items, we will consider the appropriateness of further bans or other interventions. During this second phase of work, we will consider items such as wet wipes and equivalent moist towel products. It is well known many of these products enter the sewerage system, often creating problems with blockages and potentially even causing flood risks.
- 36. There are wide range of uses for these types of products. They are used for personal hygiene, for care of children and to quickly and effectively clean surfaces in a wide variety of situations. Recent concerns regarding COVID-19 have caused people in Wales to become more conscious of the importance of cleaning surfaces where a number of people may be present throughout a day. This may lead to a greater perceived reliance on the use of disposable cleaning cloths. At this stage, we do not have sufficient evidence as to the impact a potential ban on these items might have. Further, it is not yet clear there is a sufficient range of alternative products on the market which are less problematic in the environment. We will shortly be commissioning evidence to examine the potential impact of including wet wipes within future interventions.

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

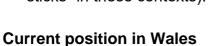
Question 12 – Are there any other items that should be included in any future proposals to tackle single use plastics? Please give reasons and where possible evidence to support this view.

# Annex A: Summary of research on the manufacture, sale and use of single use plastic items in Wales

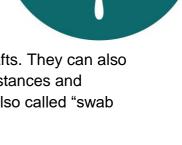
# **Item 1 - Single Use Plastic Cotton Buds**

#### **Description of item and uses**

- 37. Plastic stemmed cotton buds commonly have a polypropylene straw stem and use a plastic-based adhesive to attach a small ball (bud) of cotton wool to each end of the stem.
- 38. They are commonly used in the home for hygiene purposes such as ear cleaning, first aid, make-up application or arts and crafts. They can also be used in a medical or forensic context to apply and remove substances and medicines or to take microbiological cultures and DNA samples (also called "swab sticks" in these contexts).



39. Our research estimates 100 million cotton bud sticks are sold in Wales, with an estimated 30 million of these being made of single use plastic. We have been unable to identify any cotton bud manufacturers in Wales. Global market research indicates the top 10 global manufacturers of cotton buds have their main manufacturing base outside wales (predominately in South-East and Southern Asia).



## **Item 2 - Single Use Plastic Plates**

#### **Description of item and uses**

40. Our research identified a wide range of uses for plates, including serving plates, dinner plates, side plates and saucers. These often come in a variety of different shapes and sizes, from standard round to square or oval. On this basis we believe any single use plastic plate would also include the following items:



- Trays and platters for service purposes used for hors d'oeuvres, canapes, appetizers, desserts, takeaways.
- Bowls used as soup and salad bowls (although not those used for ready packaged salads), dessert bowls and large capacity bowls for serving.
- Laminated paper plates Plates with a plastic or 'biodegradable' coating to decrease its absorbency.
- 41. Single use plastic plates are often sold direct to the consumer in shops to be used in the home. For example, for events, parties and barbeques. They can also be supplied 'for free' at the point of sale alongside foods in catering and takeaway businesses. Such plates are sold with convenience/ready meal foods. Plates required to heat a product were not included in the scope of our research. For example, those that come with microwave or oven meals. These items were not included in our research because food is unlikely to be consumed off these plates "on-the-go", presenting a low littering risk. In addition, they are often made from recyclable plastic and can be dealt with using existing domestic recycling systems.

#### **Current position in Wales**

- 42. An estimated 59 million single use plates are sold per year in Wales, 29 million plastic, and 29 million paper. This equates to an average of 19 disposable plates per person per year.
- 43. The uses of these plates vary from household use purchased at retail outlets (for example, for parties and outdoor eating) and commercial contract use purchased at wholesale outlets or direct from manufacturers (for example, music festivals and street food vendors).
- 44. Our research has also indicated the main manufacturing base for plates is outside the UK (predominately South-East Asia and North America), however it also identified potential gaps in existing manufacturing datasets.

# Item 3 – Single use plastic cutlery

#### **Description of item and uses**

45. We believe single use cutlery is defined as being disposable serve ware. It is often supplied 'for free' at the point of sale for foods in catering and takeaway businesses, sold with convenience/ready meal foods, or sold direct to the consumer in supermarkets to be used in the home. This would include the following items:



- forks
- knives
- spoons
- chopsticks
- sporks (combined forks and spoons with ready to eat pasta/ salads)
- 46. Our research has identified three different situations where single use plastic cutlery might be used. This includes for use on the premises mainly to save costs of washing reusable cutlery e.g. at events or conferences, to be taken out with food which cannot be hand eaten for consumption on-the-go, at BBQs/ picnics/ parties and to avoid security risks associated with metal cutlery e.g. in prisons, aircraft and festivals.

#### **Current position in Wales**

47. We estimate 226 million units of plastic cutlery are sold annually in Wales, with 159 million of these being plastic. Research undertaken by the European Commission<sup>12</sup>. reports that single use plastic cutlery is predominantly and increasingly imported from the Asia-Pacific region into Europe. However, interviews with stakeholders during our research process indicated there are several manufacturers in Wales using plastic spoons for bespoke applications, such as single-portion ice-cream pots.

<sup>&</sup>lt;sup>12</sup> Reducing Marine Litter: action on single use plastics and fishing gear – Impact Assessment: European Commission, 2018 - <a href="https://ec.europa.eu/environment/circular-economy/pdf/single-use plastics impact assessment.pdf">https://ec.europa.eu/environment/circular-economy/pdf/single-use plastics impact assessment.pdf</a>

# Item 4 – Single use plastic drinks stirrers

#### **Description of item and uses**

48. We have identified drinks stirrers as rigid single-use products used to help sugar dissolve into hot drinks or to mix drinks such as tea, coffee and various alcoholic beverages. The predominant market is the hospitality sector and they are mainly used in pubs, clubs and restaurants.



#### **Current position in Wales**

49. It is estimated 11 million units are sold annually in Wales, with 5.7 million of these being plastic. Our research suggests they are largely supplied from outside the UK by importing wholesalers.

# Item 5 - Single use plastic straws

#### **Description of item and uses**

- 50. Plastic straws are typically made of polypropylene, with other types of plastic used for their production in minority markets e.g. for medical-enabling uses. We have defined disposable plastic drinking straws as being rigid or flexible in nature, plain or coloured and they may come wrapped in film for hygiene purposes. An array of straws are produced for both domestic and commercial uses. Our research included the small drinking straws commonly wrapped in plastic film and attached to beverage cartons.
- 51. Straws are used for a variety of uses, both domestically and commercially. Most are bought business-to-business and supplied in restaurants, pubs, hotels, retail and schools. Straws are also used in a medical context in order to safely administer predosed medicines. Flexible plastic straws are also used to assist or enable consumption of drinks and liquid food for medical purposes.

#### **Current position in Wales**

52. Our research estimates 256 million units of straws were sold per year in Wales, 173 million of these were plastic. Plastic-free single-use alternatives are currently manufactured in Wales.

# Item 6 - Single use plastic balloon sticks

#### **Description of item and uses**

53. Balloon sticks are attached to latex air-filled balloons to support them to give an impression that they are floating. Each 'maxi stick and cup' contains a stick element (resembling a straw) and a cup which attaches to the balloon without puncturing it.



54. They are used mainly outdoors and often by children. Wholesale consumers include restaurant chains, charities and the party sector. These products are largely sold business to business, rather than business to consumer. However, end users are often individuals, and mainly children.

#### **Current position in Wales**

55. We estimate 1 million units of balloon sticks are sold per year in Wales. No manufacturers were identified in Wales.

# Item 7 - Single use beverage cups made from expanded and extruded polystyrene (EPS/ XPS)

#### **Description of item and uses**

- 56. Cups for beverages made of expanded polystyrene and extruded polystyrene are typically used to save the costs of washing reusable cups. For example, at community fairs, events and conferences. This includes cups with or without a cover/ lid.

  These cups are particularly suited for hot drinks given EPS/ XPS's insulation properties.
- 57. They are commonly used in prisons, hospitals and care homes to avoid security risks associated with glass or other materials. The lids to cover the cups are made from non-expanded polystyrene and provide the necessary functional performance required for hot beverages on-the-go.

#### **Current position in Wales**

58. We estimate there are 33 million units of disposable cups sold per year in Wales, of these 26 million are made of EPS/ XPS. Our research was unable to identify any manufacturers operating in Wales.

# Item 8 - Single use food containers made from expanded and extruded polystyrene (EPS/XPS)

#### **Description of item and uses**

- 59. We have used the definitions provided in the European Union's
  Single Use Plastic Directive<sup>13</sup> to identify the type of food
  containers used in Wales. This defines food containers as being
  receptacles, such as boxes, with or without a cover, used to contain food which is:
  - (a) intended for immediate consumption, either on-the-spot or takeaway;
  - (b) is typically consumed from the receptacle; and
  - (c) is ready to be consumed without any further preparation, such as cooking, boiling or heating, including food containers used for fast food or other meals ready for immediate consumption.
- 60. Food containers made of expanded or extruded are predominantly used at takeaway premises (high street vendors and street food vendors such as burger/ chip shops and kebab shops). Some are used by the hospitality sector in hotels, pubs and in food takeaway delivery businesses. EPS/ XPS food containers are also used at events, although there is an increasing move towards alternative products. The items are sold to consumers via the foodservice sector and businesses via foodservice wholesalers.

#### **Current position in Wales**

61. Sales volume estimates for EPS/XPS cups were based on previous research for Defra and scaled based on a ratio of Welsh to English population of 6%. For cups, 33 million units were estimated to be sold per year in Wales, 26 million EPS/XPS, and 7 million paper. Our research was unable to identify any manufacturers operating in Wales.

<sup>&</sup>lt;sup>13</sup> Directive EU 2019/904 – the reduction of the impact of certain plastic products on the environment: European Union - <a href="https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=0]:L:2019:155:FULL&from=EN">https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=0]:L:2019:155:FULL&from=EN</a>

# Item 9 - Products made from oxo-degradable plastics

#### **Description of item and uses**

- 62. Our research defines 'oxo-degradable plastic' as "plastic materials which include additives which, through oxidation, lead to the fragmentation of the plastic material into micro-fragments or to chemical decomposition". Oxo-degradation is defined by CEN (the European Standards authority) as "degradation resulting from oxidative cleavage of macromolecules".
- 63. Products made with this additive technology and available on the market include film applications such as carrier bags, agricultural mulch films and, most recently, certain plastic bottles. Other uses include packaging applications, with products such as blister packaging, labels and caps.

#### **Current position in Wales**

64. Whilst 'oxo-degradable plastics' could encompass several different types of products, our research was unable to identify any significant market in Wales. Our research found there was a degree of uncertainty around the sale and use of products made of oxo-degradable plastics in the UK more generally.