

## Response ID ANON-N5QQ-VHH5-Z

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

Submitted on 2020-12-08 09:19:13

### 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:**

The Higher and Further Education (HFE) sector in Scotland recognises the significant negative environmental, social and economic impacts of single-use plastic items and oxo-degradable products. In recent years, many institutions have committed to reducing and/or removing items listed above and others (including disposable cups and plastic bottled water) from campus operations with significant outcomes. For example, following a plastic awareness campaign and a student survey on the possibility of removing single use plastic items from the college's facilities, Dundee and Angus College officially stopped selling and supplying all disposable plastic items in 2018 including cutlery, cups and bottled water. These actions removed approximately 28 tonnes of plastic waste from the College's waste streams in just one year. Similar actions followed, including disposable coffee cup charges at the University of Stirling and University of Dundee. In addition, supported by the College Development Network, Scotland's College Principals agreed earlier this year collectively to remove plastic beverage containers from campus retail operations.

**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:**

The sector recognises that waste management and its impacts are a global issue - first in terms of the embodied carbon within single-use plastic items contributing to climate change and, second, as demonstrated by the transport of waste and recycling to non-UK countries, a practice which has caused significant health and environmental issues for communities at or close to waste sites. The manufacturing of the specific single-use plastic items for a non-domestic market does not alleviate these wider issues, nor supports the drive in innovation needed to create sustainable behaviours and packaging.

**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:**

EAUC-Scotland are not aware of any such products on the Scottish market, but a ban should be implemented to safeguard against their introduction.

**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:**

**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:**

All catering and bar facilities should have plastic straws available at request for individuals with medical needs. In addition, we recommend a campaign alongside the rolling out of the proposed regulations that highlight the need of single use plastic items for some individuals. Additional information could also be displayed at catering and bar facilities.

EAUC-Scotland recommends specific consultation with disability groups to understand the potential direct and in-direct impacts of proposed changes and co-create solutions

**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:**

EAUC-Scotland welcomes considerations for further market restrictions including plastic wet wipes and plastic tampon applicators. Alternatives to these items are available and align with wider sector awareness raising activities, particular with regards to sustainable sanitary products, for example Environmenstrual Week - [https://www.eauc.org.uk/environmenstrual\\_week\\_highlights\\_sanitary\\_plast](https://www.eauc.org.uk/environmenstrual_week_highlights_sanitary_plast)

Other items should also be considered. For example, Ireland is banning plastic condiment sachets, wet wipes and plastic hotel toiletries. France is banning plastic confetti, plastic toys being supplied with menus and plastic teabags. Canada will ban plastic grocery bags and six-pack rings, food take-out containers. We also think multipack wrapping, plastic cigarette filters and all single-use cups and food containers / plates / bowls in closed settings should be considered.

**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.**

No

**Please enter text here:**

**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.**

Yes

**Please enter text here:**

The COVID-19 pandemic has resulted in a huge global increase in plastic waste and pollution from items such as single-use disposable masks, gloves and wipes and hand sanitiser bottles. The Scottish HFE sector feels this overrides many of the hard-won behaviour change and policy successes within institutions relating to single use resource items. Since the onset of the Covid pandemic, concern over hygiene has meant that reusable containers and cups have been turned away. However, research shows that reusables are as safe and over 100 scientists from 18 countries have signed a letter outlining the evidence to show that 'reusable systems can be used safely by employing basic hygiene'.

Additionally, the crisis has also had an effect on relevant policy in Scotland. The Circular Economy Bill, which was due to be introduced in spring 2020, has been delayed. This is more important than ever as we recover from this pandemic to drive a circular recovery, making Scotland more resilient to future global crises and creating circular business opportunities.

**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:**

Although single-use plastic is a particular problem due to the nature of plastic in the environment, single-use in general is also problematic as it is wasteful of natural resources. Re-useable alternatives are preferable to single-use items made from another material. Where there are re-useable alternatives, a ban on single-use (regardless of material) might be appropriate.

## **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.:**

**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:**

**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?)**

Not Answered

Please enter text here:

**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:

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

Not Answered

Please enter text here:

## About you

**What is your name?**

**Name:**

Matt Woodthorpe

**What is your email address?**

**Email:**

mwoodthorpe@eauc.org.uk

**Are you responding as an individual or an organisation?**

Organisation

**What is your organisation?**

**Organisation:**

EAUC-Scotland

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

Publish response with 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?:**

Slightly satisfied

**Please enter comments here.:**

Proposed improvement would be to create a downloadable question template for consultees to use offline.