



Response submitted online

<https://bit.ly/2D1AA0W>

Plastics.Consultation@defra.gsi.gov.uk

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Plastics Consultation
Department for Environment, Food and Rural Affairs
Ground Floor, Seacole Block,
2 Marsham Street
London
SW1P 4DF

EAUC
University of Gloucestershire,
The Park, Cheltenham,
GL50 2RH
Office Tel: 01242 714321
info@eauc.org.uk
www.eauc.org.uk/

Dear Sir/Madam,

Please find below our consultation response on the proposed ban of straws, stirrers and cotton buds.

Consultation: Consultation on proposals to ban the distribution and/or sale of plastic straws, plastic - stemmed cotton buds and plastic drink stirrers in England

ENVIRONMENTAL ASSOCIATION FOR UNIVERSITIES AND COLLEGES (EAUC):

Response on behalf of our Members (United Kingdom and Ireland)

About the EAUC

Our passion is to create a world with sustainability at its heart. That's our vision. We exist to lead and empower the post-16 education sector to make sustainability 'just good business'.

The membership of the EAUC comprises higher and further educational institutions, with a combined budget of some £25 billion, responsible for educating over 2 million students supported by half a million staff.

We have regional and country chapters, with member institutions connected deeply with business, industry, health and civic bodies at local levels, with reach internationally via their research, innovation and student mobility.

We believe

- That UK and Irish education should be a global leader in sustainability
- That educational institutions have a responsibility as anchors in their communities to be agents of change
- That education has a unique opportunity to transform lives and communities
- That education is at the heart of global sustainability
- That every student should have access to sustainability education
- That education should reflect best practice in operational sustainability
- In being flexible and adaptable to find solutions for a resilient future
- In the value of international collaboration

Our values

- Pioneering - driving sustainability through innovation
- Independence - our own unique voice



- Collaboration - together we go further
- Role Model - leading by example
- Empowering - supporting and inspiring our members

EAUC's Approach to the Inquiry

Post-16 education plays a crucial role in driving environmental changes – due to its privileged position in influencing the next generation, the geographical land mass that its institutions stretch across and the economic and social power that it wields. The EAUC focused its response on straws for this consultation, because it was felt that this was the most controversial of the plastics facing the ban. Members' key areas of concern were around:

- Making provisions for those with medical conditions that cannot use any of the current alternatives to plastic straws.
- Ensuring the accompaniment of education with plastic bans so that people understand why this is happening, and how to properly dispose/recycle any alternatives used.
- Improving waste stream infrastructure to ensure biodegradable and compostable products can indeed do these things.
- Encouraging communities to look to their Higher and Further Education Institutions for examples of best practice on plastic reduction.
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For reference – the EAUC also submitted views on banning wider Single-Use Plastic (SUP) earlier this year in response to the HM Treasury consultation on tackling the plastic problem. You can find our views [here](#). Our members support a much wider-scale ban on plastic than the three plastic products mentioned in the DEFRA consultation. Single-use plastic is tethered within society due to its availability and pricing, and this is further embedded by a throwaway culture that has been fostered in recent decades and a lack of education for sustainable development. Plastic is a scourge on our cities, countryside and sea and must be tackled head on. Rightly, the Government has recognised the role universities, colleges and businesses must play if we are to make progress on this agenda. We hope to continue working with the Government to ensure this progress is made.

Response to the consultation:

Consultation findings

Based on consultation with members there was a general consensus that plastic straws, plastic stirrers and plastic cotton buds should all be banned, and the Government needed to be more ambitious with the timescale and breadth of products covered.

For straws, there was consensus that there should be a temporary exemption and that is for medical use. While many suggested there are alternative products for medical use, we take advice from the NUS Disabled Students' Committee. They feel that 'plastic straws are currently an irreplaceable auxiliary aid for disabled people to lead independent lives, a protected right under the UN Convention on the Rights of Persons with Disabilities (UNCPRD), which the UK has signed up to, and the Equality Act 2010'. We believe in the long term, there will be viable alternatives, but for the time being, these exemptions should be put in place. The onus must also remain on retailers and service providers to provide these exemptions under the Equality Act's requirement for service providers to make 'reasonable adjustments' to their policies or practices for those with disabilities – which should be defined under the social model rather than medical model.

There are no suggested exemptions in lieu of stirrers or cotton buds, as alternatives are readily available i.e. wooden stirrers and fully biodegradable cotton buds.

Members raised valid concerns around suitable alternatives to single-use plastic. They advised that there must be a continued monitoring of single-use plastic alternatives to ensure they do not begin to have negative impacts – for example wood may be a widely used replacement (stirrers and paper stem cotton buds) and it is essential that this does not contribute to deforestation. Equally, where heavier emphasis is placed on biodegradable and compostable alternatives, there must be the infrastructure to cater for breaking these products down. The rate of biodegradability (based on present technology) isn't fast enough to protect the environment from plastic pollution. At the moment, the UK does not have sufficiently developed waste streams to segregate and compost 'biodegradable' plastics or plastic-alternatives effectively - they will end up as contaminants to other waste streams and will damage existing recycling industries and confuse consumers.

There needs to be a rapid change in the processing of waste, and a lot of targeted information to ensure everyone knows the difference between these plastics.

Furthermore, there should be a much wider ban on single-use plastics imminently.

Role of tertiary education in this process

Many universities and colleges have already recognised this issue and are pioneering in their fight against plastic on their campuses - they offer an excellent example of best practice and knowledge and there should be better relationships within communities with Higher and Further Education institutions to exchange knowledge. There is also an opportunity for tertiary education and business to work together on innovations and solutions to the plastic issue. We would encourage the Government to engage with them to discuss research into single-use plastic alternatives.

Examples of plastics initiatives in Higher or Further Education Institutions include:

- University of Reading – [‘Sustain it bottle’](#) – a drinks dispenser for reusable containers. The scheme has so far has avoided 132,705 plastic bottles (1st September 2017 to 31st April 2018) with a reusable bottle rate of 43%.
- Aberystwyth University became the first university in the world to be awarded [Plastic-Free University status](#) in August 2018.

There are many, many more readily available.

We hope that the Government will consult with us to ensure education is embedded in this process. It is the only way change can be sustained.

Yours sincerely,

A handwritten signature in black ink that reads 'Iain A Patton'.

Iain Patton, CEO, EAUC