

Response submitted by email

DRS@defra.gov.uk

09 May 2019

Deposit Return Scheme Team
Department for Environment, Food and Rural Affairs,
Ground Floor, Seacole Block,
2 Marsham Street,
London, SW1P 4DF

Dear Sir/Madam,

Please find below our consultation response on several of the plastic consultations.

Consultations:

- **Introducing a Deposit Return Scheme in England, Wales and Northern Ireland**
- **Plastic packaging tax**
- **Reforming the UK packaging producer responsibility system**

EAUC – The Alliance for Sustainability Leadership in Education:

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

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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.

Plastic has become tethered within society due to its availability and cheap pricing, and has been further embedded by a throwaway culture strongly linked to a lack of education for sustainable development. We very much welcome this focus on tackling plastic. It is a scourge on our cities, countryside and sea and must be tackled head on.

We have consulted with members on various relevant elements of these consultations to provide the following response. We would also encourage you to read our responses to Government consultations on the [banning of plastic straws, plastic stemmed cotton buds and plastic drink stirrers \(2018\)](#), and [tackling the plastic problem \(2018\)](#).

Response to the consultation:

DRS

A DRS is a sensible solution in the attempt to lower littering and improve recycling. We would support an 'all in' model and would encourage the Government to include as many materials as possible. Return points should be plentiful and there should be a mandatory requirement for any establishment or venue that sells products covered under the DRS to host one – without exception. The only caveat that might be required is that establishments with a floor size below a certain amount can refuse returnable items above a certain volume. Anyone exempt under these circumstances should be required to clearly indicate through signage where the nearest deposit return point is for these larger volume items of plastic.

The recently announced DRS system in Scotland should heavily influence a UK-wide DRS system, they must be able to work together. With that in mind, we would strongly suggest a deposit rate of 20p per item.

Many universities and colleges have already recognised plastic for the increasingly problematic issue that it is and are pioneering in their fight against plastic on their campuses. They can offer excellent examples of best practice 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 plastic alternatives.

Many institutions have already used a DRS or reverse vending machine, and you can find out more about them here (there are more examples):

- [University of Glasgow](#)
- [University of Dundee](#)
- [Anglia Ruskin University](#)

Institutions have undertaken other plastic-orientated initiatives, such as (among many):

- University of Reading – '[Sustain it bottle](#)' – a drinks dispenser for reusable containers. The scheme has so far 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.
- University of York have implemented a [Latte Levy](#).
- University of Hull have an investigative research project, run by a diverse team of experts called the [Plastics Collaboratory](#).

There are, however, a few issues with the Deposit Return Scheme. Namely that the infrastructure must be in place to support this, and currently, it is not.

Some plastics are not recyclable. Other types of plastics may have relatively low usage, meaning that collection and recycling of them is difficult to arrange - but ultimately it adds up. Liquid and food contamination can make plastics non-recyclable - another issue prevalent on campuses.

The recycling sector is market-driven, so if a plastic is not viable to be recycled, it will be otherwise disposed of in landfill, or burned. It is not cost-effective for waste companies to collect all types of plastic and segregate them due to space requirements needed to bulk up separate types. Mixed recycling technology focuses on type 1 and 2 with other plastic sorting happening in Europe (though there are some UK exceptions with some companies looking at other types, but little investment due to market considerations). All of these issues must be carefully resolved.

A Deposit Return Scheme is incredibly worthwhile, but there must be better infrastructure to cope with the influx of plastic and to ensure its disposal is not unsustainable.

Additionally, as part of an economic system that is endangering human life on Earth we need to place a heavier emphasis on removing plastics from the supply chain. Therefore avoidance of the use of plastics would be preferable to an improved recycling scheme. However, we recognise that implementing a plastic tax could ensure the reduction of plastic use, and the DRS running alongside helps to ensure plastics that do continue to be used do not end up in our oceans and across our countryside.

This is an opportunity to innovate – Further and Higher Education Institutions are ideally placed to provide research and training into the decoupling of our economy from plastic, and to produce alternatives. More investment must be made into Education for Sustainable Development in schools, universities and colleges, but also lifelong learning in the workplace.

We are supportive of the DRS, but ultimately, it must be simple and convenient – or it will not be effective.

Plastic Packaging Tax

We are supportive of the Plastic Packaging Tax – a plastics tax will drive behaviour change all the way through the supply chain. This tax and the subsequent regulation from an independent DMO will provide the impetus needed to ensure manufacturers, producers, retailers and consumers are discouraged from the creation of unnecessary plastic and encouraged to find innovative new plastic alternatives.

Reforming the UK packaging producer responsibility system

We agree that packaging waste regulations have needed an overhaul for a long time and we support the principles of the EPR as outlined in the consultation – though as ever, they could be more ambitious.

It is right the producers of packaging shoulder the financial responsibility of plastic throughout its lifespan (full net cost). They must be held accountable for the creation of a product that will take up to 1000 years to degrade. To this end, we agree with the concept of modulated placed on the market (POM) fees to discourage the production of plastic that cannot be recycled or is difficult to recycle. There should be no exceptions for producers, irrelevant of size.

Areas in which we would be keen to see improvement are:

- Improved packaging design and labelling is a simple fix to a common problem: lack of clarity. All producers should be required to outline if their packaging is recyclable to ensure it is made as easy as possible for consumers to do the right thing with the item. They should also be encouraged to make products from single materials or a combination that is easily divisible for recycling purposes.
- Consistency across local authorities on collection. Students in student housing are often confused by the requirements for recycling, and if this was consistent, it would improve rates of correctly recycled packaging. There should also be enforced standardisation for private waste contractors.
- An increased number of 'on the go' recycling and litter bins would improve the ease of recycling and reduce littering. Most institutions host bins such as this, and find them, in combination with clear signage, fairly effective at reducing litter.

- Disposable cups should fall under both an EPR and DRS Scheme. If they contain plastic, then producers shoulder the responsibility for the processing of a plastic-based product after it has been used by a consumer. But to encourage consumers to play their part in the correct disposal of them, they should come under the DRS scheme. In the short term, recycling targets should be set as cups are such a prevalent issue. In the long term, we would like to see a big step away from the use of disposable products, towards reusable ones.
- If EPR does bring communications into financial scope, then education should fall under this. Communications are limited in their effectiveness if not coupled with education. We must understand the science behind plastic and why it is so problematic for the environment. Therefore, we would propose that some of the funding for communications be designated to schools, colleges and universities, to ensure all young people gain Education for Sustainable Development (ESD). This should also be offered as lifelong learning to ensure these communications start having an immediate effect on the older generations. This could be offered through workplace training or as free training within the community.

Potential issues:

- An unintended consequence of increased recycling collection from a greater number of waste streams is more vehicles on the road to collect them. This would need to be counterbalanced in some way – perhaps by using an electric vehicle fleet.
- There may be a disincentive for business customers like universities if waste contracts become more expensive due to increased operational costs of waste contractors as well.

We believe bringing in a plastics tax, overhauling the EPR and incentivising recycling through a DRS is a good combination of initiatives that should have the desired effect on reducing the amount of plastic in the environment. We would encourage the Government to be brave when setting targets for this, and ensure there is proper monitoring, transparency and annual reporting.

We hope you find this information useful and we would be keen to discuss the role of Further and Higher Education in tackling plastic moving forward.

Yours sincerely,



Iain Patton, CEO, EAUC