



Rt Hon Michael Gove, MP  
Secretary of State for Environment, Food and Rural Affairs  
House of Commons  
London SW1A 0AA

date: 27<sup>th</sup> Nov 2018

Dear Secretary of State for Environment, Food and Rural Affairs

### **Single-Use Plastics and Energy and Resource Efficient Products**

**Environment Links UK (ELUK)** comprises the combined membership of Wildlife and Countryside Link, Scottish Environment LINK, Wales Environment Link and Northern Ireland Environment Link; and collectively represents more than 8 million supporters across the United Kingdom.

Our undersigned members would like to draw your attention to two EU initiatives currently underway, on **Single Use Plastics and Fishing Gear** and **Energy and Resource Efficient products**, where the UK's support and demand for ambition is of utmost importance. These proposals would help pave the way to shaping the regional economy, and be part of a global shift of which being at the forefront is an advantage. They are also entirely in line with UK domestic policy and ambition across the UK's four nations.

#### **Energy and Resource Efficient Products**

EC proposals on energy and resource efficient products are soon to be discussed by Member States and to be voted on before the end of 2018. These proposals are part of a package of ecodesign and energy labelling measures and include provisions to make products more easily repairable and recyclable by design.

The proposed energy efficiency requirements alone, covering 16 products, can save an additional 62 million tonnes in CO<sub>2</sub> emissions a year, whilst the adoption of all measures is expected to save consumers and businesses €23bn in reduced energy bills from 2030<sup>1</sup>. The proposed measures would make it easier for consumers to have certain products repaired, reducing waste and unleashing job potential in the repair sector. A recent IRP report<sup>2</sup> emphasises the considerable environmental and economic gains from remanufacturing, refurbishment, repair and direct re-use and adopting these EC proposals would go some way to realising that potential.

#### **Single Use Plastics**

We welcomed the ambitious proposals on single use plastics which were adopted by the European Parliament on October 24<sup>th</sup>. We understand that EU Member States are now discussing the file with a view to finalising positions by the end of the year. We urge the UK Government to do its utmost to ensure that the proposals as adopted by the European Parliament are backed in the final imminent negotiations.

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<sup>1</sup> <https://www.coolproducts.eu/news/official-europe-revives-plans-for-energy-and-resource-efficient-products-for-now-1>

<sup>2</sup> <http://www.resourcepanel.org/reports/re-defining-value-manufacturing-revolution>



In particular, it is imperative that voluntary agreements are not allowed to replace binding extended producer responsibility (EPR) schemes. Council's proposed Article 8 and Article 17.3 weakens the environmental benefits that could be achieved under this Directive, as well as weakening implementation of the polluter pays principle under European law. EPR responsibilities must reflect the full environmental costs of the life cycle of products, including costs of litter clean-up. We urge the UK Government to support this provision, not least given domestic commitments across the UK countries to tackle litter. If strong measures are adopted for single use plastics, this would contribute to reducing plastic pollution by more than 50% for the most littered single-use items, avoiding environmental damage which would otherwise cost €22bn by 2030, and avoid emitting 3.4 m tonnes of CO<sub>2</sub> by 2030<sup>3</sup>.

Additionally, we are highly concerned that Council is advocating for a delay in implementing EPR requirements to 2025 rather than 2021. Given the scale of plastic pollution and citizens' concern, a four year delay is unjustifiable, especially for packaging products where EPR schemes have been in place for decades.

Finally, we call you to support the following elements, which are also potentially under threat:

- The proposed 90% collection target by 2025 for plastic bottles, without an intermediary target;
- The proposed 35% minimum recycled content target for plastic beverage bottles;
- EU-wide market restrictions for oxo-degradable plastics and all expanded polystyrene food containers, beverage containers and cups;
- A quantitative reduction target (of at least 25% by 2025) for food containers, beverage containers and cups; and
- A 50% collection target and 15% recycling target by 2025 for fishing gear.

For the current generation to leave the environment in a better state than we found it, we need to stop consuming more than our share of natural resources and re-gauge our economy to one centred on keeping products and materials in use for as long as possible and reducing our environmental footprint. Progressing both the ecodesign agenda and the phasing out of non-essential and harmful single use plastics<sup>4</sup>, are of utmost importance in the transition to a resource efficient and more circular economy and to meet our climate change targets.

We trust that you see the importance of supporting the issues discussed above and urge you to seize the opportunity to show leadership in these upcoming debates.

**The following Environment LINKs members sign up to this letter:**

**Amphibian and Reptile Conservation  
Association for the Protection of Rural Scotland  
Badenoch and Strathspey Conservation Group  
Bumblebee Conservation Trust**

<sup>3</sup> [http://europa.eu/rapid/press-release MEMO-18-3909\\_en.htm](http://europa.eu/rapid/press-release_MEMO-18-3909_en.htm)

<sup>4</sup> Defined as plastics which are not practicably recyclable or are hazardous in the natural environment



**Buglife**  
**Earthwatch Institute**  
**Environmental Investigation Agency (EIA)**  
**Friends of the Earth Scotland**  
**Froglife Trust**  
**Institute of Fisheries Management (IFM)**  
**Marine Conservation Society**  
**North East Mountain Trust**  
**ORCA**  
**RSPCA**  
**Scottish Allotments and Gardens Society**  
**Scottish Badgers**  
**Scottish Wildlife Trust**  
**Soil Association Scotland**  
**Whale and Dolphin Conservation**

If you would like to contact anyone with regard to this letter, please email Phoebe Cochrane  
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CC  
Sir Tim Barrow, UK's Permanent Representative to the EU  
Katrina Williams, UK's Deputy Permanent Representative to the EU  
DEFRA officials