



## **A Guide to responding to the Scottish Government consultation on banning single-use plastic items**

**Scottish Environment LINK's circular economy project**

**December 2020**

The Scottish Government consultation '**Introducing market restrictions on single-use plastic items in Scotland**' can be found here: <https://consult.gov.scot/zero-waste-delivery/introducing-market-restrictions-on-single-use-plas/> The consultation is open until 4 January.

The consultation paper has background information as well as the questions.

When you are ready to answer the questions, click 'begin consultation'.

LINK suggests the following responses, but please add in your own thoughts. It is fine to leave questions blank if you don't feel equipped to answer them.

**1a) Do you support the proposal to introduce a restriction on the supply by businesses in a commercial capacity in Scotland on each of the single-use plastic items listed and all oxo-degradable products?**

**Single-use plastic cutlery (forks, knives, spoons, chopsticks)**

**Single-use plastic plates (plates, trays/platters, bowls)**

**Single-use plastic straws**

**Single-use plastic beverage stirrers**

**Single-use plastic balloon sticks**

**Single-use food containers made of expanded polystyrene**

**Single-use cups and other beverage containers made of expanded polystyrene, including their covers, caps and lids**

**All oxo-degradable products**

Tick 'yes' for the 8 items listed.

**1b) Please give reasons and where possible provide evidence to support the view expressed in response to Question 1(a).**

You could include the following points:

- Surveys by the Marine Conservation Society and Keep Scotland Beautiful find that these are some of the most commonly found items in marine and terrestrial litter.
- When littered, they harm animals and spoil local people's and visitors' experience of the countryside.
- Their pervasive nature, and both the chemicals included in the plastics and those attracted to the plastic fragments, make them particularly harmful to nature.
- There is public support to ban single-use plastics. A Scottish Environment LINK survey found 80% of respondents support a ban on all environmentally harmful single-use plastic items where there are practical reusable alternatives.

**1c) Do you support the introduction of a restriction on the supply in a non-commercial capacity (rather than only in the course of commercial activity) of the specified single-use plastic and oxo-degradable items?**

Tick 'Yes'

**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.**

We 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?**

Tick 'No'

**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?**

We didn't feel equipped to answer this question

**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.**

Tick 'Yes'

Suggested points:

- We fully support market restrictions on the additional items mentioned above - plastic wet wipes, plastic tampon applicators and other products contained in the UK Plastic Pact.
- Other items should 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?**

The Impact Assessment is a long accompanying document. We had minor comments, but thought that it was comprehensive. If you don't have time to read the assessment, you can leave this question blank.

**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?**

Tick 'Yes'

Suggested points:

- The COVID-19 pandemic has resulted in a huge global increase in plastic waste from items such as single-use disposable masks, gloves and wipes and hand sanitiser bottles.
- It has wakened our awareness that we need to live with nature – our incursions into habitats and pressure on the natural environment are thought to be key risk factors behind such pandemics.
- 90% of global biodiversity loss is caused by resource extraction and processing – we must not allow the pandemic to justify unsustainable practices that put further pressure on our natural environment.
- Since the onset of the Covid pandemic, concern over hygiene has meant that reusable containers and cups have been turned away and pubs have served drinks in disposable cups. However, research shows that reusables are as safe and over 100 scientists from 18 countries signed a letter outlining the evidence to show that ‘reusable systems can be used safely by employing basic hygiene’.
- 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?**

Suggested points:

- 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.
- It is important to keep an eye on overall plastic consumption, due to its impacts on climate change and biodiversity. For example, there has been a marked increase in the use of heavier duty plastic bags from some retailers since the plastic bag charge came in. Durable plastic items need to be used repeatedly before they are discarded if they are to offer net benefit over single-use in terms of plastic consumption.
- It is crucial that we take strong and prompt political action to tackle single-use plastics and fully implement the SUP Directive. Our climate and biodiversity crises demand swift action on plastics and we must also uphold our commitment to keep pace with Europe.

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[A Circular economy for a fairer footprint](#) – A Scottish Environment LINK project

Scottish Environment LINK is the forum for Scotland’s voluntary environment community, with 40 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society. LINK provides a forum for these organisations, enabling informed debate, assisting co-operation within the voluntary sector, and acting as a strong voice for the environment.

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