

Response ID ANON-NTSF-3RZU-F

Submitted to Consultation on proposals to ban commonly littered single-use plastic items in England
Submitted on 2022-02-11 09:39:15

Introduction

1 Would you like your response to be confidential?

No

Blank free text box for answer:

2 What is your name?

Name:
Dan Turner

3 What is your email address?

Email:
dan.turner@nlwa.gov.uk

4 It would be helpful for our analysis if you could indicate which of these sectors you most align yourself/your organisation with for the purpose of this consultation (please tick the one which is most applicable to you):

public body

5 If you are responding on behalf of an organisation, what is its name?

Organisation:
The North London Waste Authority

Proposals

Questions

6 Do you agree or disagree with the proposed definition of plastic?

Agree

Blank free text box for answer:

7 Do you agree or disagree with the proposal to introduce a ban on the supply of the following single-use items in England?

Agree with introducing bans - Plastic plates only:
Agree

Agree with introducing bans - Plastic plates, including plastic bowls:
Agree

Agree with introducing bans - Plastic plates, including plastic trays:
Agree

Agree with introducing bans - Plastic plates, including plastic bowls and plastic trays:
Agree

Agree with introducing bans - Plastic cutlery:
Agree

Agree with introducing bans - Plastic balloon sticks:
Agree

Agree with introducing bans - EPS food containers:
Agree

Agree with introducing bans - EPS beverage containers:
Agree

Blank free text box for answer:

Agree. We routinely see non-recyclable single-use items contaminating recyclable material. This comes at a financial cost to our taxpayers that runs into the millions. We feel the proposal does not go far enough and would like the ban to include further single use plastic items. We feel a further taxation on single use plastics would reduce consumption and encourage producers to drive up recycled content more widely.

8 We propose that the ban should cover all bio-based, compostable, and biodegradable plastic (such as PLA). Please tick in the table those plastics you support the ban including.

Bio-based, compostable, biodegradable - Plastic plates:

All

Bio-based, compostable, biodegradable - Plastic cutlery:

All

Bio-based, compostable, biodegradable - Plastic balloon sticks:

All

Bio-based, compostable, biodegradable - EPS food containers:

All

Bio-based, compostable, biodegradable - EPS beverage containers:

All

Text box:

Agree to all. We feel the ban should be a driver for cultural and behavioural change that incentivises the use of reusable items. By enabling PLA type products users can easily misidentify these and potentially contaminate recycling streams.

9 Do you agree or disagree with the proposal to exclude from the ban a) plates used as packaging or b) plates used as packaging except those used in eat-in settings?

Exclude packaging - Exclude plates used as packaging:

Disagree

Exclude packaging - Exclude plates used as packaging, with the exception of those used in 'eat-in' settings:

Disagree

Blank free text box for answer:

We feel both plates used as packaging and plates used as packaging except those used in eat-in settings should be included within the ban, again we feel by including these items will drive industry to source and develop more sustainable system and products

Impact on alternatives to banned items

10 Do you currently supply customers with any of the items we are proposing to ban?

No

Impact of alternatives to banned items

12 Are there any risks that alternatives to plastic plates, plastic cutlery, plastic balloon sticks, EPS food containers, and EPS beverage containers will themselves have significant environmental impacts?

Risk of alternatives having environmental impacts - Plastic plates:

Don't know

Risk of alternatives having environmental impacts - Plastic cutlery:

Don't know

Risk of alternatives having environmental impacts - Plastic balloon sticks:

Don't know

Risk of alternatives having environmental impacts - EPS food containers:

Don't know

Risk of alternatives having environmental impacts - EPS beverage containers:

Don't know

Blank free text box for answer:

Exemptions

13 Will any of the proposed item bans have a negative impact on certain people? If yes, why. Please tick all boxes that apply.

Will any of the proposed item bans have a negative impact on certain people? - Plastic plates:
Socioeconomic status, Type of job

Will any of the proposed item bans have a negative impact on certain people? - Plastic cutlery:
Socioeconomic status, Type of job

Will any of the proposed item bans have a negative impact on certain people? - Plastic balloon sticks:
Socioeconomic status, Type of job

Will any of the proposed item bans have a negative impact on certain people? - EPS food containers:
Socioeconomic status, Type of job

Will any of the proposed item bans have a negative impact on certain people? - EPS beverage containers:
Socioeconomic status, Type of job

Blank free text box for answer:

Due to the commercial value and ease of use of some single use plastics, we feel that by banning these items this will have an impact on some people who either use these items as part of business needs (Food and Beverage etc.) or members of the public with reduced net income

14 Should there be any exemptions from any ban for the following items e.g., in certain locations or for particular purposes?

Should there be any exemptions from any ban? - Plastic plates:
No

Should there be any exemptions from any ban? - Plastic cutlery:
No

Should there be any exemptions from any ban? - Plastic balloon sticks:
No

Should there be any exemptions from any ban? - EPS food containers:
No

Should there be any exemptions from any ban? - EPS beverage containers:
No

Blank free text box for answer:

We feel by not having a consistent approach in terms of locations and processes, this would add ambiguity and therefore a reduction in engagement, confusion and ultimately a return to single use plastics in some areas

Timing of the ban

15 Our proposed date for the ban on single-use plastic plates, plastic cutlery, plastic balloon sticks, EPS food containers, and EPS beverage containers is April 2023. We think this will allow sufficient time for industry to use up existing stock and source alternatives where needed. Do you agree or disagree that this date will give industry sufficient time to prepare for the ban? E.g., sourcing alternative products, using up existing stock.

Timing of the ban - Plastic plates:
Agree

Timing of the ban - Plastic cutlery:
Agree

Timing of the ban - Plastic balloon sticks:
Agree

Timing of the ban - EPS food containers:
Agree

Timing of the ban - EPS beverage containers:
Agree

Blank free text box for answer:

While we accept April 2023 is a necessary delay to allow industry to plan for the ban, we feel any further delay will be unnecessary and of concern

Impact assessment

16 Do you agree or disagree with our estimations that in 2018, 20 single-use plates, 75 pieces of single-use cutlery, 3 EPS boxes, 8 EPS cups, 6 EPS pots and 3 EPS trays and cones were consumed per person in England?

Do you agree or disagree with our estimations that in 2018, 20 single-use plastic plates, 75 pieces of single-use plastic cutlery, 3 EPS boxes, 8 EPS cups, 6 EPS pots and 3 EPS trays and cones were consumed per person in England? - Plastic plates:
Don't know

Do you agree or disagree with our estimations that in 2018, 20 single-use plastic plates, 75 pieces of single-use plastic cutlery, 3 EPS boxes, 8 EPS cups, 6 EPS pots and 3 EPS trays and cones were consumed per person in England? - Plastic cutlery:
Don't know

Do you agree or disagree with our estimations that in 2018, 20 single-use plastic plates, 75 pieces of single-use plastic cutlery, 3 EPS boxes, 8 EPS cups, 6 EPS pots and 3 EPS trays and cones were consumed per person in England? - Plastic balloon sticks:
Don't know

Do you agree or disagree with our estimations that in 2018, 20 single-use plastic plates, 75 pieces of single-use plastic cutlery, 3 EPS boxes, 8 EPS cups, 6 EPS pots and 3 EPS trays and cones were consumed per person in England? - EPS food containers:
Don't know

Do you agree or disagree with our estimations that in 2018, 20 single-use plastic plates, 75 pieces of single-use plastic cutlery, 3 EPS boxes, 8 EPS cups, 6 EPS pots and 3 EPS trays and cones were consumed per person in England? - EPS beverage containers:
Don't know

Blank free text box for answer:

17 Under our baseline scenario where there is no ban of single-use plastic plates and cutlery, we have forecast a 10% reduction per annum in the market share of the products to reflect a shift away from single-use plastics. Do you agree or disagree with this assumption?

Don't know

Blank free text box for answer:

18 Under our baseline scenario where there is no ban of EPS items, we have forecast a 5% reduction per annum in EPS market share to reflect a shift away from single-use plastics. Do you agree or disagree with this assumption?

Don't know

Blank free text box for answer:

19 Do you agree or disagree with our assumption that in 2018 50% of single-use plates and 90% of single-use cutlery in England were made from plastic?

Do you agree or disagree with our assumption that in 2018 50% of single-use plates and 90% of single-use cutlery in England were made from plastic? - Plates:
Don't know

Do you agree or disagree with our assumption that in 2018 50% of single-use plates and 90% of single-use cutlery in England were made from plastic? - Cutlery:
Don't know

Blank free text box for answer:

20 Do you agree or disagree with our assumption that in 2020, 80% of all food and beverage boxes, cups, pots and trays and cones in England were made from EPS?

Do you agree or disagree with our assumption that in 2020, 80% of all food and beverage boxes, cups, pots and trays and cones in England were made from EPS? - Box:
Don't know

Do you agree or disagree with our assumption that in 2020, 80% of all food and beverage boxes, cups, pots and trays and cones in England were made from EPS? - Cup:
Don't know

Do you agree or disagree with our assumption that in 2020, 80% of all food and beverage boxes, cups, pots and trays and cones in England were made from EPS? - Pot:
Don't know

Do you agree or disagree with our assumption that in 2020, 80% of all food and beverage boxes, cups, pots and trays and cones in England were made from EPS? - Tray:
Don't know

Do you agree or disagree with our assumption that in 2020, 80% of all food and beverage boxes, cups, pots and trays and cones in England were made from EPS? - Cone:

Don't know

Blank free text box for answer:

21 We have assumed that 10% of single-use plastic plates and cutlery are produced in the UK. Do you agree or disagree with this assumption?

We have assumed that 10% of single-use plastic plates and cutlery are produced in the UK - Plastic plates:

Don't know

We have assumed that 10% of single-use plastic plates and cutlery are produced in the UK - Plastic cutlery:

Don't know

Blank free text box for answer:

22 We have assumed that 95% of EPS food and beverage containers are produced in the UK. Do you agree or disagree with this assumption?

We have assumed that 95% of EPS food and beverage containers are produced in the UK. - EPS food containers:

Don't know

We have assumed that 95% of EPS food and beverage containers are produced in the UK. - EPS beverage containers:

Don't know

Blank free text box for answer:

23 If applicable, if a ban on single-use plastic plates and cutlery was to be implemented, how would your business respond?

Stop using single-use plates and cutlery in your business

24 If you manufacture single-use plates and cutlery domestically, how would you expect a ban on these items to affect your activity?

Not Answered

Blank free text box for answer:

Not applicable to NLWA

25 If applicable, if a ban on EPS food and beverage containers was to be implemented, how would your business respond?

Stop using containers in your business

26 If you manufacture EPS food and beverage containers domestically, how would you expect a ban on these items to affect your activity?

Not Answered

Blank free text box for answer:

Not applicable to NLWA

27 Our estimations of the costs of single-use plastic plates and cutlery compared with alternatives are shown in the below table. Do you agree or disagree with our estimations?

Our estimations of the costs of single-use plastic plates and cutlery compared with alternatives are shown in the below table. - Plate (plastic):

Don't know

Our estimations of the costs of single-use plastic plates and cutlery compared with alternatives are shown in the below table. - Cutlery (plastic):

Don't know

Our estimations of the costs of single-use plastic plates and cutlery compared with alternatives are shown in the below table. - Plate (alternative):

Don't know

Our estimations of the costs of single-use plastic plates and cutlery compared with alternatives are shown in the below table. - Cutlery (alternative):

Don't know

Blank free text box for answer:

28 Our estimations of the costs of EPS compared with paper alternatives are shown in the below table. Do you agree or disagree with our estimations?

Estimations of the costs of EPS compared with paper alternatives - Box (EPS):

Don't know

Estimations of the costs of EPS compared with paper alternatives - Cup (EPS):
Don't know

Estimations of the costs of EPS compared with paper alternatives - Pot (EPS):
Don't know

Estimations of the costs of EPS compared with paper alternatives - Trays (EPS):
Don't know

Estimations of the costs of EPS compared with paper alternatives - Cones (EPS):
Don't know

Estimations of the costs of EPS compared with paper alternatives - Box (Paper):
Don't know

Estimations of the costs of EPS compared with paper alternatives - Cup (Paper):
Don't know

Estimations of the costs of EPS compared with paper alternatives - Pot (Paper):
Don't know

Estimations of the costs of EPS compared with paper alternatives - Trays (Paper):
Don't know

Estimations of the costs of EPS compared with paper alternatives - Cones (Paper):
Don't know

Blank free text box for answer:

29 Do you agree or disagree with our assumption (outlined in the accompanying impact assessments) that the additional costs from alternative materials will remain the same for the appraisal period?

11. Do you agree or disagree with our assumption (outlined in the accompanying impact assessments) that the additional costs from alternative materials will remain the same? - Plastic plates:
Don't know

11. Do you agree or disagree with our assumption (outlined in the accompanying impact assessments) that the additional costs from alternative materials will remain the same? - Plastic cutlery:
Don't know

11. Do you agree or disagree with our assumption (outlined in the accompanying impact assessments) that the additional costs from alternative materials will remain the same? - Plastic balloon sticks:
Don't know

11. Do you agree or disagree with our assumption (outlined in the accompanying impact assessments) that the additional costs from alternative materials will remain the same? - EPS food containers:
Don't know

11. Do you agree or disagree with our assumption (outlined in the accompanying impact assessments) that the additional costs from alternative materials will remain the same? - EPS beverage containers:
Don't know

Blank free text box for answer:

30 At end of life, we have assumed the below outcomes for plastic and wooden cutlery. Do you agree or disagree with these assumptions?

Don't know

Blank free text box for answer:

n

31 At end of life, we have assumed the below outcomes for plastic and paper plates. Do you agree or disagree with these assumptions?

Don't know

Blank free text box for answer:

32 At end of life, we have assumed the below outcomes for EPS and paper alternative products. Do you agree or disagree with these assumptions?

Don't know

Blank free text box for answer:

33 Do you agree or disagree with our assumption that litter disamenity values remain the same for the appraisal period?

Don't know

Blank free text box for answer:

34 In determining the number of businesses that will be affected by a ban on EPS food and drink containers and single-use plastic plates and cutlery, we used Standard Industrialisation Codes (SICs) to identify categories of businesses likely to be affected. However, we have assumed that fast-food restaurants are more likely to use EPS food and beverage containers and single-use plastic plates and cutlery than restaurants and therefore estimated the number of fast-food restaurants in England rather than using all the businesses in the "restaurants and mobile food service activities" SIC. Do you agree or disagree with this assumption?

SIC codes - Plastic plates:

Don't know

SIC codes - Plastic cutlery:

Don't know

SIC codes - EPS food containers:

Don't know

SIC codes - EPS beverage containers:

Don't know

Blank free text box for answer:

35 Do you agree or disagree with our estimation that 144,342 businesses will be affected by familiarisation costs for a ban on EPS containers?

Don't know

Blank free text box for answer:

36 Do you agree or disagree with our estimation that 90,650 businesses will be affected by familiarisation costs for a ban on single-use plastic plates and cutlery?

Don't know

Blank free text box for answer:

37 We have assumed that, on average, it would take 30 minutes of a full-time employee's time for businesses to familiarise themselves with the ban. Do you agree or disagree with this assumption?

Don't know

Blank free text box for answer:

38 In calculating additional fuel costs to businesses from transporting heavier paper items, we have assumed a mean distance travelled of 100km. Do you agree or disagree with this assumption?

Don't know

Blank free text box for answer:

39 For our central scenario for costs being passed from businesses to consumers, we have assumed that 60% of the costs businesses incur as a result of a greater unit price of alternative items will be passed to consumers. Do you agree or disagree with this assumption?

For our central scenario for costs being passed from businesses to consumers, we have assumed that 60% of the costs businesses incur as a result of a greater unit price of alternative items will be passed to consumers - Plastic plates and cutlery:

Don't know

For our central scenario for costs being passed from businesses to consumers, we have assumed that 60% of the costs businesses incur as a result of a greater unit price of alternative items will be passed to consumers - EPS containers:

Don't know

For our central scenario for costs being passed from businesses to consumers, we have assumed that 60% of the costs businesses incur as a result of a greater unit price of alternative items will be passed to consumers - Plastic balloon sticks:

Don't know

Blank free text box for answer:

40 Do you anticipate any additional costs and/or constraints to a) industry and b) consumers from this proposed ban on single-use plastic plates, plastic cutlery, plastic balloon sticks, EPS food containers, and EPS beverage containers?

Do you anticipate any additional costs and/or constraints - Plastic plates (industry):

Yes

Do you anticipate any additional costs and/or constraints - Plastic cutlery (industry):

Yes

Do you anticipate any additional costs and/or constraints - Plastic balloon sticks (industry):

Yes

Do you anticipate any additional costs and/or constraints - EPS food containers (industry):

Yes

Do you anticipate any additional costs and/or constraints - EPS beverage containers (industry):

Yes

Do you anticipate any additional costs and/or constraints - Plastic plates (consumers):

Yes

Do you anticipate any additional costs and/or constraints - Plastic cutlery (consumers):

Yes

Do you anticipate any additional costs and/or constraints - Plastic balloon sticks (consumers):

Yes

Do you anticipate any additional costs and/or constraints - EPS food containers (consumers):

Yes

Do you anticipate any additional costs and/or constraints - EPS beverage containers (consumers):

Yes

Blank free text box for answer:

We agree this ban could increase costs for industry, and these costs may in some instances be passed on to consumers. We feel however the environmental benefits outweigh the impacts on consumers.

Additional questions

41 Apart from a ban, are there any other approaches that Government should consider? Please provide any evidence in support of your recommended approach.

Blank free text box for answer:

We feel that the Government should widen the scope for the ban on single use items, and communicate the benefits effectively with industry and users to ensure compliance and support.

42 Is there anything else you would like to tell us relating to the proposed ban on the supply of single-use plastic plates, cutlery, balloon sticks and food and beverage containers made out of EPS?

Blank free text box for answer: