

Response ID ANON-NTSF-3RQM-X

Submitted to Consultation on proposals to ban commonly littered single-use plastic items in England
Submitted on 2022-02-11 16:57:57

Introduction

1 Would you like your response to be confidential?

No

Blank free text box for answer:

2 What is your name?

Name:
Emily Nichols

3 What is your email address?

Email:
emily@r-e-a.net

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):

non-governmental organisation

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

Organisation:
The Association for Renewable Energy and Clean Technology

Proposals

Questions

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

Disagree

Blank free text box for answer:

Is there good reason for the definitions of plastic in the plastic tax and single-use-plastics (SUPs) rules to differ (apart from the former's need to reference Article 3(5) of Regulation (EC) No 1907/2006)?

Plastic tax definition: 'plastic' means a material consisting of a polymer within the meaning of Article 3(5) of Regulation (EC) No 1907/2006, to which additives or other substances may have been added, with the exception of cellulose-based polymers that have not been chemically modified.

SUP ban definition: defines plastic as a material consisting of polymer to which additives or other substances may have been added, and which can function as a main structural component of final products, with the exception of natural polymers that have not been chemically modified.

Regarding the SUP ban's definition, we have interpreted Defra's '...and which can function as a main structural component..' as meaning (due to inclusion of 'can') that non-natural polymer and natural polymer that has been chemically modified will be banned, regardless whether such polymer functions as the main structural component in the plastic item. Moving on from that, we recommend that plastic is defined as 'a material consisting of one or more polymers to which additives or other substances may have been added, and which can function as a main structural constituent of a final product or a manually separable component of a final product, with the exemption of natural polymers that have not been chemically modified.'

We suggested replacing 'structural component' with 'structural constituent' because in standards for compostable items the polymer is termed a constituent (in a raw material, intermediate material or final product) while a component is a manually separable part of the final product.

The SUP ban's exception of 'natural polymers that have not been chemically modified' from its definition of plastic is much more appropriate than the plastic tax's exception of cellulose-based polymers because the former also exempts products with good potential as alternatives to the banned plastics, e.g. those consisting of mycelium, which is described at

<https://www.nature.com/articles/srep41292#:~:text=Mycelium%20is%20mainly%20composed%20of,natural%20polymeric%20composite%20fibrous%20material> as 'mainly composed of natural polymers as chitin, cellulose, proteins, etc, so it is a natural polymeric composite fibrous material'.

The definition we have proposed will exempt from the ban final products and manually separable components of final products whose main structural constituent is one or more natural polymers that have not been chemically modified.

Considering the product formats covered by this consultation but also other not commonly littered product formats, the REA supports the use of independently certified industrially compostable, industrially digestible-compostable and home compostable packaging and non-packaging product in formats and usage contexts where they bring more food or plant wastes to industrial composting, AD or integrated AD and composting facilities or to home composting, and/or where they enable more efficient management of biodegradable wastes in these End of Life contexts, e.g. by reducing the amount of non-compostable plastic contamination arriving at such facilities. (WRAP's guidance 'Considerations for compostable plastic packaging' {see <https://wrap.org.uk/resources/guide/compostable-plastic-packaging-guidance>} and A Plastic Planet's 'The Compostable Conundrum' working paper {see <https://aplasicplanet.com/inspiring-change/projects/>}) recommend product formats and contexts for use where it makes sense for them to be compostable. We believe these guides are useful but need further evolving, fine tuning, alignment and dialogue with stakeholders to build support for them.)

Returning to the specific product formats within this consultation's scope, there is need to extend the SUP rules' definition of plastic so that industrially compostable, industrially digestible-compostable and home compostable products are also exempt, regardless whether their polymeric content is *also* wholly bio-based (means derived from non-fossilised, once-living organisms, e.g. plants, fungi, algae), wholly fossil-derived (technically feasible but uncommon) or a mixture of bio-based and fossil-derived. To ensure such products, in the formats that are within the scope of this consultation do not become banned the SUP rules should include that: 'Any product format within the ban's scope which consists of one or more polymers to which additives or other substances may have been added, and which can function as a main structural constituent of a final product or a manually separatable component of a final product, is not banned if the final product or manually separatable component of it has a valid, independently issued certificate of compliance with at least one of the following standards: BS EN 13432, BS EN 14995, ASTM D 6400, NF T51-800 or AS 5810.'

Please be aware that BS EN 13432 and BS EN 14995 include optional disintegration and biodegradability pass/fail criteria for, respectively, assessing packaging and plastic product suitability for industrial anaerobic digestion followed by a 'short second aerobic stabilization phase' (composting phase) for dewatered digestate.

Valid means the certificate has not passed its expiry date. Product re-assessment and re-certification is a necessary requirement as manufacturers sometimes need to modify final products.

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:

Disagree

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:

In answer to question 7 we have supported banning conventionally recyclable plastic versions of plates, trays, bowls, cutlery and balloon sticks and supported the banning of EPS food containers and beverage containers. Defra has stated these items (although not specified 'where conventionally recyclable plastic' with regard to the non-EPS items) are 'either commonly littered, not commonly recycled, or both. They say 'current estimates suggest that only 10 % of single-use plastic plates and cutlery are recycled upon disposal'.

Please see our answers to question 8 which cover organically recyclable (industrially compostable and industrially digestible-compostable) and home compostable plates, trays, bowls and cutlery. Our answer to question 8 also covers others which are not organically recyclable or home compostable and which we believe are unsuitable for recycling with conventional plastics.

Beyond assessing items littered on beaches, future work to assess commonly littered item formats and materials they are made of should include urban areas and rail and road highway verges near to urban areas, stations and junctions.

Defra has proposed the definition of single-use plastic plates includes plates, trays and bowls designed to be used for any type of food consumption. (They state alternatives such as single-use paper plates or reusable plates already exist.) We believe such inclusion complicates matters and brings higher risk of unintended consequences, especially given that the consultation proposes not to ban SUP plates used as packaging (and presumably also SUP bowls used as packaging unless they are removed from the plates definition). It also seems unnecessary to ban trays used as packaging, simply

because they're included in the definition of plates.

Scottish Government has reviewed its definitions and decided to remove bowls and trays from its draft Scottish legislation. It has 'decided single-use plastic bowls will be considered alongside food containers under forthcoming measures to reduce the consumption of these single-use items'.

England's SUP bans: please do not include bowl and tray within the definition of plate and consider using the definition of plate at <https://www.zerowastescotland.org.uk/single-use-plastics-regulations/faqs>. If you decide to ban SUP trays, bowls or both please define them separately.

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:

Bio-based, Biodegradable

Bio-based, compostable, biodegradable - Plastic cutlery:

Bio-based, Biodegradable

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

All

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

Compostable, Biodegradable

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

Compostable, Biodegradable

Text box:

The tick box answer options for qu 8 do not reflect the range of technically feasible and actually produced relevant products. Our tick box answers are given based on our assumptions that: 'bio-based' means 'bio-based only' (not also compostable, not also biodegradable or not also both compostable and biodegradable); that 'compostable' means industrially compostable, industrially digestible-compostable or home compostable* (i.e. has a valid, independently issued certificate of compliance with at least one of the corresponding standards we have referred to in the 8th paragraph of our answer to qu 6); and that 'biodegradable' means an item is NOT also industrially compostable, industrially digestible-compostable or home compostable**. For * and** items, their polymeric content(s) can technically be wholly bio-based, wholly fossil-derived or a combination of the two.

We use 'format' as meaning the shape and purpose of an item.

We call for government for England to do the following:

- a) 'Bio-based only' plastic plates, trays, bowls and cutlery: bio-based materials could be formed into polymers to produce products of these formats that are, apart from the polymeric material's origin, the same as conventionally recyclable plastics. We support banning them UNLESS industry and government put substantial support and resource into co-collecting and recycling them with conventionally recyclable plastics and enhancing messaging and education to citizens so that far fewer conventional plastic plates, trays, bowls and cutlery items are littered in future and no substantial number of bio-based, non-EPS equivalents are littered in future.
- b) 'Bio-based only', non-EPS plastic food containers and beverage containers: bio-based materials could be formed into polymers to produce products of these formats that are, apart from the polymeric material's origin, the same as conventionally recyclable plastics. Conventionally recyclable fossil-derived versions of these plastic product formats are already being collected and conventionally recycled.
- c) Industrially compostable, industrially compostable-digestible or home compostable plastic plates, hot ready meal trays, bowls and cutlery: they should not be banned because there are localised, closed-loop business-to-business arrangements in place where, after use, products of these types (as a minimum, industrially compostable ones) that are successfully collected with food wastes and industrially composted. (These current practices might not yet include trays for hot ready meals but WRAP's guidance on compostable plastic packaging suggests such trays are a suitable application [due to the difficulty of removing baked-on food after consuming the meal] and that trays for cold ready meals and beverage bottles are not [these should remain conventionally recyclable]). We regard fruit/veg punnets as not fitting Defra's proposed definition of 'food containers' for the purpose of SUP bans. (If government considers banning plastic fruit/veg punnets, our view is that industrially compostable, industrially compostable-digestible or home compostable plastic fruit/veg punnets should not be banned.)
- d) Plastic balloon sticks: 'bio-based only' alternatives seem unlikely to biodegrade any more quickly in natural environments than conventional plastic balloon sticks; the development of 'biodegradable' versions seems unlikely to reduce their littering into natural environments and as far as we are aware there is no standard (and no BSI PAS) that adequately specifies pass/fail criteria for such products; it does not make sense for this product format to be industrially compostable, industrially digestible-compostable or home compostable because it does not fall within the 'makes sense' purposes we have outlined in the 7th paragraph of our answer to question 6.
- e) 'Biodegradable' plastic plates, trays, bowls, cutlery, food containers and beverage containers: they should all be banned as we believe there is no adequate justification for them. Reasons: 1) even if designed to disintegrate and biodegrade acceptably fast and not exert ecotoxic effects in natural environments, such environments are not their intended or main places of use, 2) claims they should not be littered but will biodegrade if they are littered seem unlikely to deter many people who do litter, 3) they are unsuitable for industrial composting, anaerobic digestion, any combination of both these biowaste treatment technologies and home composting, 4) they are contaminants in 'dry recyclable' waste streams (including waste streams for conventionally recyclable plastics), 5) after use they are only fit for disposal into residual waste streams, and 6) they unnecessary given alternatives

already in use or alternatives that are technically feasible but not yet supported in government policies, cost-competitive, and conventionally or organically recycled on a widespread basis.

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:

Agree

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

Disagree

Blank free text box for answer:

It seems necessary for practical reasons to exempt all plates used as packaging. Plates used as packaging in 'eat-in' settings should not be exempted unless food service operators could ensure that customers who dine-in don't use SUP plates as packaging yet allow customers who take food away to use them (as packaging). Would paper-only plates be adequate for food service at festivals and sports events, where capacity for using and washing reusable plates is too low?

Compostable paper-based, polymer-lined plates have proved useful in sporting event & festival contexts, e.g. some festival goers dine at the food service provider's tables (in which circumstance such plates not used as packaging) while others 'take out' their food to elsewhere within the venue (in which circumstance such plates are used as packaging). In sports stadia, is eating a hot-dog on a compostable plate while viewing a sports event from the stands 'dine-in' or 'take-out'? It's not practical to rely on reusable plates due to limited capacity/throughput rate of washing facilities at these venues.

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:

We have not evaluated the risks of all possible alternatives to conventional plastic product formats within scope of this consultation. In the remainder of this answer we briefly comment on features of standards for industrially compostable and industrially digestible-compostable packaging and plastic product formats that are geared to ensuring independently certified products, and any correctly self-assessed as compliant, do NOT have significant environmental impacts. We have answered 'don't know' above in qu 12 as there is not an option for answering 'no' for industrially compostable, industrially digestible-compostable items and home compostable items, and 'don't know' for all possible other types.

Earlier in our response, we have said that industrially compostable, industrially digestible-compostable items and home compostable plates, trays, bowls and cutlery products should not be banned if they have a valid, independently issued certificate of compliance with at least one of the standards we have specified (see answers to questions 7 and 8).

The standards for industrially compostable and industrially digestible-compostable items have been recognised for years in UK End of Waste rules (the Compost Quality Protocol and PAS 100) for waste-derived compost products produced by industrial composting processes, as too has TUV Austria's 'OKcompost HOME' certification scheme for home compostable items, which is similar to the home compostable item standards against which independent certifiers DIN Certco (Germany) and Renewable Energy Assurance Ltd (UK) assess and certify home compostable items. In addition, the BS EN 13432 and BS EN 14995 standards have been recognised for years in the AD Quality Protocol for waste-derived digestate products.

Considering BS EN 13432 and BS EN 14995 (these are the ones we have made time to describe in response to this consultation), they set minimum requirements for disintegration and biodegradation of, respectively, packaging and plastics under industrial composting conditions – and as an additional

option also under digestion and then composting conditions - within maximum specified timescales. They also set stringent, maximum allowable concentrations applicable to a range of potentially toxic elements – and require plant germination and growth tests to show tested samples are not ecotoxic. If government has any concerns the standards referred to above do not adequately control risks of significant environmental impacts, please let us know what they are so that standards review and revision processes can take them into account.

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:

Don't know

Will any of the proposed item bans have a negative impact on certain people? - Plastic cutlery:

Don't know

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

No

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

No

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

No

Blank free text box for answer:

No comments

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:

Yes

Should there be any exemptions from any ban? - Plastic cutlery:

Yes

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:

Yes, any type of plate, tray, bowl or cutlery item independently certified compliant with at least one of the standards BS EN 13432, BS EN 14995, ASTM D6400, NF T51-800 or AS 5810 should be exempt from any ban. They represent some of the *at least industrially compostable* tableware, packaging and plastic product formats being collected in the UK from closed loop sources (e.g. offices, a street market, cafes, restaurants, festivals and sporting venues), supplied to in-vessel composting facilities and being composted. There is a Compost Connect scheme covering London and Birmingham and business-to-business arrangements for composting Vegware's compostable tableware and packaging items cover over 40 of the UK's largest towns and cities, in which 71 % of the UK's population live. Other companies involved with collecting food and compostable wastes and supplying them for in-vessel composting are First Mile, Cawleys, CountryStyle and Paper Round.

A notable past, successful example was in 2012 when food wastes and used compostable packaging and non-packaging wastes were collected from the London 2012 Olympic Games and Paralympic Games venues and in-vessel composted (report and guide downloadable from <http://www.organics-recycling.org.uk/page.php?article=2637>). A news media story on outcomes (see <http://www.organics-recycling.org.uk/page.php?article=2507>) covered the fate of waste leaving the games venues. 'Exclusive use of SITA UK's MRF in Barking for 78 days from 1 July 2012 and a contractual requirement to track all waste to its end processes - which many businesses in the UK do not do - showed that the true reuse, recycling and composting rate [of operational waste] was 62 % by weight. (Ninety three percent of all [operational] waste collected from London 2012 venues was taken to this site.) Composting of food waste and compostable packaging and non-packaging (such as cutlery) recycled 17 % of the 10,173 tonnes of operational waste.'

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:

Don't know

Timing of the ban - Plastic cutlery:

Don't know

Timing of the ban - Plastic balloon sticks:

Don't know

Timing of the ban - EPS food containers:

Don't know

Timing of the ban - EPS beverage containers:

Don't know

Blank free text box for answer:

No comments

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:

No comments

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:

No comments

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:

No comments

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:

No comments

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:

No comments

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:

No comments

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:

No comments

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

Don't know

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

Don't know

Blank free text box for answer:

No comments

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

Don't know

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

Don't know

Blank free text box for answer:

No comments

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:

No comments

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:

No comments

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:

No comments

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:

No comments

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:

No comments

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:

No comments

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:

No comments

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:

No comments

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:

No comments

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:

No comments

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:

No comments

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:

No comments

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:

No comments

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):

Don't know

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

Don't know

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

Don't know

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

Don't know

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

Don't know

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

Don't know

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

Don't know

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

Don't know

Blank free text box for answer:

If government does ban plastic plates, bowls, trays and cutlery that meet it's proposed definitions of items for banning, if it does not also ban 'biodegradable' products (see our answer to qu 8 for what we mean by 'biodegradable') in these formats these latter ones seem likely to arrive, via food waste collections, at England's composting and AD facilities whose inputs include food wastes. If that happens, those facilities' waste management costs per tonne will go up because discarded 'biodegradable' products are contaminants in composting and AD facilities.

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:

No comments

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:

No comments