



Department
for Environment
Food & Rural Affairs

Call for evidence on commonly littered and problematic plastic items

November 2021

We are the Department for Environment, Food and Rural Affairs. We're responsible for improving and protecting the environment, growing the green economy, sustaining thriving rural communities and supporting our world-class food, farming and fishing industries.

We work closely with our 33 agencies and arm's length bodies on our ambition to make our air purer, our water cleaner, our land greener and our food more sustainable. Our mission is to restore and enhance the environment for the next generation, and to leave the environment in a better state than we found it.



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www.gov.uk/defra

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Executive summary

1. The government is committed to leaving our environment in a better state than we found it and protecting it for future generations. The 25 Year Environment Plan, published in January 2018, outlines the steps we will take to achieve that, including eliminating avoidable plastic waste by 2042.
2. We are currently consulting on proposals to ban single-use plastic plates, cutlery, balloon sticks, and expanded and extruded polystyrene cups and food and beverage containers in England. We are committed to going further and addressing other sources of plastic pollution, which is why we are also launching this call for evidence, to help gather evidence on other problematic plastic items and help inform future policy making.
3. We are particularly interested in wet wipes, tobacco filters, sachets, and other single-use cups. These items frequently escape waste management systems and enter the terrestrial and/or marine environment, and we are exploring whether we need to take additional action to reduce their use and tackle the problems caused by their incorrect disposal. We want to gather further evidence on these items, such as on their environmental impact, and gauge views on potential policy options to better inform our approach. In addition to these four items, we are seeking views on other potentially problematic single-use plastic items and whether there is support for future policy action for these items, as well as how to achieve a shift away from single-use culture.
4. A single-use product is a product not conceived, designed, or placed on the market to accomplish multiple trips or rotations by being returned to a producer for refill or re-used for the same purpose for which it was conceived.
5. Plastic means 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. We are using the definition of plastics in the [Environmental Protection \(Plastic Straws, Cotton Buds and Stirrers\) \(England\) Regulations 2020](#).
6. Whilst the proposed ban we are currently consulting on would apply in England only, the Devolved Administrations are considering bringing forward similar regulations. We are committed to engaging closely with the Devolved Administrations in Scotland, Wales, and Northern Ireland on delivering on our shared environmental objectives across the UK and the wider impacts of these proposals, including the functioning of the UK internal market.

Call for evidence details

Geographical scope

7. England only.

Responsible body

8. This call for evidence is being carried out by Defra's Plastic, International and Climate Team, Resources & Waste Division, on behalf of the UK government.

Audience

9. This is a public call for evidence, and it is open to anyone with an interest to provide comments. The call for evidence should be of particular interest to users with specific needs, businesses involved in the manufacture or provision of wet wipes, tobacco filters, sachets, and cups, and non-governmental organisations (NGOs) concerned about the impact of single-use plastic items on the environment.

Duration

10. This call for evidence will run for 12 weeks. This is in line with the Cabinet Office's 'Consultation Principles', which advises government departments to adopt proportionate consultation procedures. The call for evidence opens **20th November 2021** - The call for evidence closes **12th February 2022**.

Responding to this call for evidence

11. Please respond to this call for evidence using the citizen space consultation hub at: <https://consult.defra.gov.uk/environmental-quality/call-for-evidence-on-commonly-littered-and-problem/consultation/edit>

By email to Plastics.consultation@defra.gov.uk

Or in writing to Call for evidence on problematic plastics and commonly littered items., Consultation Coordinator, Defra, 2nd Floor, Foss House, Kings Pool, 1-2 Peasholme Green, York, YO1 7PX.

After the call for evidence

12. Confidentiality and data protection information

13. A summary of responses to this call for evidence will be published on the government website at: www.gov.uk/defra. An annex to the call for evidence summary will list all

organisations that responded but will not include personal names, addresses or other contact details.

- 14.** Defra may publish the content of your response to this call for evidence to make it available to the public without your personal name and private contact details (for example, home address, email address, etc).
- 15.** If you click on 'Yes' in response to the question asking if you would like anything in your response to be kept confidential, you are asked to state clearly what information you would like to be kept as confidential and explain your reasons for confidentiality. The reason for this is that information in responses to this call for evidence may be subject to release to the public or other parties in accordance with the access to information law (these are primarily the Environmental Information Regulations 2004 (EIRs), the Freedom of Information Act 2000 (FOIA) and the Data Protection Act 2018 (DPA)). We have obligations, mainly under the EIRs, FOIA and DPA, to disclose information to particular recipients or to the public in certain circumstances. In view of this, your explanation of your reasons for requesting confidentiality for all or part of your response would help us balance these obligations for disclosure against any obligation of confidentiality. If we receive a request for the information that you have provided in your response to this call for evidence, we will take full account of your reasons for requesting confidentiality of your response, but we cannot guarantee that confidentiality can be maintained in all circumstances.
- 16.** If you click on 'No' in response to the question asking if you would like anything in your response to be kept confidential, we will be able to release the content of your response to the public, but we won't make your personal name and private contact details publicly available.
- 17.** There may be occasions when Defra will share the information you provide in response to the call for evidence, including any personal data with external analysts. This is for the purposes of call for evidence response analysis and provision of a report of the summary of responses only.
- 18.** This call for evidence is being conducted in line with the [Cabinet Office "Consultation Principles"](#).
- 19.** Please find our latest privacy notice uploaded as a related document alongside our call for evidence document.
- 20.** If you have any comments or complaints about the call for evidence process, please address them to: Call for evidence on problematic plastics and commonly littered items, Consultation Coordinator, Defra, 2nd Floor, Foss House, Kings Pool, 1-2 Peasholme Green, York, YO1 7PX
Or email: consultation.coordinator@defra.gov.uk

About you

1. Would you like your response to be confidential?
 - Yes
 - No
 - If you answered yes to this question, please give your reason
2. What is your name?
3. What is your email address?
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 / circle one which is most applicable to you):
 - public body
 - non-governmental organisation
 - retail industry
 - manufacturing industry
 - member of the general public
 - other (please state).
5. If you are responding on behalf of an organisation, what is its name?

Wet wipes

Wet wipes and moist wipe products, such as moist toilet tissue, are used for a range of hygiene and other purposes. As well the plastics directly contained in many of these non-flushable items, fatbergs can result in indirect plastic pollution as they are a cause of overflows, which can disperse macro and micro plastics into the wider environment. Many wet wipes are single-use plastic items and can cause problems for sewers and the environment. Water UK research has identified that wet wipes are a frequent cause of sewer blockages as a result of being flushed down the toilet.¹ Indeed, wet wipes, mostly comprising baby wipes, make up 93% of the material that causes sewer blockages, which themselves cost the water industry in England and Wales £100 million a year.² Wipes often then combine with fats, oil and grease, which are also often disposed of down sinks into drains, and combine to form fatbergs.

Wet wipes are also often disposed of incorrectly, which can cause pollution in rivers and lead to litter on beaches. The Marine Conservation Society reports that wet wipes were the third most common type of litter found on beaches in Great Britain in 2020.³ When they enter waterways they can cause harm to fish and other aquatic life.

The water industry has established a voluntary 'flushability' product standard for wet wipes, which enables a manufacturer to make wet wipes to a standard that is considered 'Fine to Flush'. The water industry has said this standard will be updated if understanding evolves of materials that should be considered as plastics. Wet wipes made to this standard are tested to ensure they do not cause blockages in sewers and can carry the 'Fine to Flush' logo on their packaging. Currently, some products indicate that they are 'flushable', even though they have not been made to the water industry's voluntary standard and may therefore continue to cause sewer blockages.

Alternatives to conventional plastic wet wipes are available, including products which are, or which claim to be, 'plastic-free'. However, when incorrectly disposed of these may have a similar impact in sewers and on the environment.

The government is considering various regulatory options to tackle these issues. These options include a ban on wet wipes containing plastic, a mandatory 'flushability' standard, mandatory labelling on packaging, and an extended producer responsibility scheme for wipes containing plastic.

Extended Producer Responsibility (EPR) is an environmental policy approach through which a producer's responsibility for a product is extended to the post-use stage. This

¹ Water UK. Wipes in Sewer Blockage Study: Final Report. 2017. Available at: <https://www.water.org.uk/wp-content/uploads/2018/11/Wipes-in-sewer-blockage-study.pdf>

² <https://www.water.org.uk/news-item/new-proof-that-flushing-wipes-is-a-major-cause-of-sewer-blockages/>

³ <https://www.mcsuk.org/news/analysing-high-streets-wet-wipe-claims/>

encourages manufacturers to consider more sustainable design decisions at the production stage.

1. Would you support a ban on wet wipes containing plastic?

You will be asked about possible exemptions in the following questions.

- Yes
 - No
 - Don't know
 - Please give reasons and supporting evidence
2. In the case of a ban on wet wipes containing plastic, would you support there being some exemptions for wipes used for medical purposes? Medical uses of wet wipes include patient care, spill absorption, and to clean equipment and surfaces.

You will be asked about additional exemptions in the next question.

- Yes
 - No
 - Don't know
 - Please give reasons and supporting evidence
3. As well as wipes used for medical purposes, are you aware of any uses or situations in which the use of wet wipes containing plastic is essential and could be considered for any exemptions in future legislation?
 - Yes
 - No

Please give reasons and provide supporting evidence.

4. Are you aware of the water industry's Fine to Flush standard?

- Yes
- No

5. If you answered yes to question 4, do you think the current water industry 'Fine-to-Flush' standard is effective in reducing sewer blockages caused by wet wipes?

- Yes
- No
- Don't know
- Please give reasons and supporting evidence

6. Do you support a mandatory 'flushability' standard for wet wipe products placed on the market to indicate more clearly which wipe products are truly flushable?

- Yes
- No
- Don't know
- Please give reasons and supporting evidence

7. Do you support mandatory labelling on packaging about disposal and the impact of wet wipe products on the environment?

- a. Yes
- b. No
- c. Don't know
- d. Please give reasons and supporting evidence

8. Would you support an extended producer responsibility scheme for wipes containing plastic? If so, how might this operate?

- Yes
- No
- Don't know

Please provide suggestions for how this might operate.

9. What alternatives are there to single-use plastic wet wipes, including wipes made from non-plastic materials? We would welcome evidence on the cost of these alternatives, their environmental impact and any issues that could be caused by increased use of them.

- Yes
- No
- Don't know

Please give supporting evidence on the cost and environmental impact.

Tobacco filters

Following our commitment to explore regulatory measures to tackle cigarette littering, the government is conducting research to robustly examine the relative merits of options such as material bans and extended producer responsibility. We are therefore seeking evidence in this consultation to support that research.

Cigarette filters can be a component of a pre-rolled cigarette or sold separately. Filters are commonly made from plastic cellulose acetate; or less commonly paper or activated charcoal.

Despite smoking rates in England being at their lowest recorded level, cigarette butts continue to be the most littered item in England, and globally. Defra's latest litter composition study, carried out by Keep Britain Tidy (KBT), found on average that of every 100 items of litter, 66 were cigarette butts and 2 were other smoking related litter.⁴

When littered, cigarette butts release not only plastic into the open environment, but also nicotine, heavy metals, and other chemicals.

10. Do you support the government taking regulatory action to tackle littering of tobacco filters?
- Yes
 - No
 - Don't know

Please give reasons and supporting evidence.

11. If the government takes forward an extended producer responsibility (EPR) scheme to tackle cigarette littering, which of the following costs related to managing littered tobacco filters, if any, do you think should be covered by producers?
- campaigns aimed at promoting responsible disposal
 - provision of bins and management of binned filters
 - clearing up ground litter and subsequent treatment
 - data gathering and reporting
 - none
 - Other, please specify

Please give reasons and supporting evidence.

12. Are there other regulatory approaches that government should consider?

Please give reasons and supporting evidence.

⁴ Litter Composition Analysis: Summary Report. 2020. Available at:

<http://sciencesearch.defra.gov.uk/Default.aspx?Module=More&Location=None&ProjectID=20212&FromSearch=Y&Publisher=1&SearchText=eq0121&SortString=ProjectCode&SortOrder=Asc&Paging=10>

13. What are the financial costs of managing waste tobacco filters? Please give supporting evidence including quantified data where possible.
14. What are the environmental impacts of waste cellulose acetate tobacco filters, including those associated with inappropriate disposal? Please give supporting evidence.
15. What are the environmental impacts of tobacco filters made from alternative materials to cellulose acetate, including those associated with inappropriate disposal? Please give supporting evidence.
16. What are the environmental impacts of smoking alternatives such as heated tobacco, disposable e-cigarettes, vape pods and oral nicotine pouches, including those associated with inappropriate disposal? Please give supporting evidence.

Single-use plastic sachets

Single-use plastic sachets are a form of packaging under the category of plastic film and flexibles, used for packaging single servings of a product. These include sachets used for food and drink, for example milk, salad dressing used in on-the-go salads, condiments and those used for cosmetics and healthcare.

Single-use plastic sachets can cause considerable harm to the marine and terrestrial environment when disposed of incorrectly. They are unlikely to be recycled due to their small size, which makes it difficult to segregate and clean them.

The public has already shown support for the government taking action, with a One Poll survey of 2,000 Britons finding that almost 8/10 Britons surveyed said plastic sample sachets should be banned in the UK, and more than 4/5 said the government should not ignore their impact on plastic pollution.⁵

17. What environmental impacts do single-use plastic sachets have? What is the evidence in support of your view?
18. Are you aware of any alternatives to single-use plastic sachets? Do you have any evidence to support that these alternatives are more environmentally friendly than single-use plastic sachets?
19. Do you support consulting on introducing a ban of single-use plastic sachets used for:
 - a. Food and drink: permanent food outlets including restaurants and cafes, and sachets provided with ready meals
 - b. Food and drink: mobile outlets including trains, airplanes, food trucks
 - c. Beauty industry: providing free samples at the point of sale or single-use quantities provided within a multipack
 - d. Support all of the above
 - e. Do not support any of the above
 - f. Please give any evidence to support your views
20. Do you support consulting on introducing a charge on single-use plastic sachets used for:
 - a. Food and drink: stationary outlets including restaurants and cafes
 - b. Food and drink: mobile outlets including trains, airplanes, mobile food vendors
 - c. Beauty industry: providing free samples at the point of sale
 - d. Support all of the above
 - e. Do not support any of the above
 - f. Please give any evidence to support your views

⁵ <https://aplasticplanet.com/media/poll-shows-uk-support-for-a-plastic-planets-sachet-ban/>

21. Are you aware of any other uses of single-use plastic sachets that could be considered for banning or introducing a charge on?

22. Are you aware of any uses or situations in which the use of sachets is essential and could be considered for exemptions in any future legislation? What is the evidence in support of your view?

Single-use cups

The Environment Audit Committee's enquiry into coffee cups found the UK uses 2.5 billion disposable coffee cups per year.⁶ As well as having low recycling rates,⁶ cups frequently end up as litter, causing harm to the environment. Defra's 2020 Litter Composition Analysis, conducted by Keep Britain Tidy, found that 'coffee cups' were the fourth most littered item by volume in England, making up 7.8% of dropped litter volume.⁷

In our consultation on Extended Producer Responsibility for Packaging, which ran from 24 March to 4 June 2021, we proposed to introduce a mandatory takeback obligation for single-use disposable cups from 2023. This would require all businesses placing filled disposable cups on the market to provide separate collection of used cups through dedicated collection points, and to arrange for the collection and recycling of these cups. This obligation would require these businesses to accept all disposable cups, irrespective of where the drink was purchased.

Sellers of disposable cups will be responsible for the cost of collecting and recycling disposable cups. It is anticipated that they may join an existing cup recycling scheme or set up their own arrangements for the collection and recycling of disposable cups. The National Cup Recycling Scheme (NCRS), set up and funded by eight major brands,⁸ already works with waste management companies and reprocessors to collect and recycle cups. 1767 tonnes of disposable cups have been recycled since 2018. A mandatory takeback scheme would also work in conjunction with two other EPR proposals to:

- Obligate producers to report tonnages of fibre-based composites placed on the market as part of their reporting obligations under EPR
- Introduce a recycling target for fibre-based composite packaging including disposable cups

Complementary to our Extended Producer Responsibility proposals, we are now considering the introduction of a charge on single-use cups. A charge would target consumers' behaviour, complementing obligations introduced through EPR, which will target producers. Studies^{9,10} indicate that a clear single-use cup charge can have a greater

⁶ Disposable Packaging: Coffee Cups - Environmental Audit Committee. Available at:

https://publications.parliament.uk/pa/cm201719/cmselect/cmenvaud/657/65705.htm#_idTextAnchor008

⁷ Litter Composition Analysis: Summary Report. 2020. Available at:

<http://sciencesearch.defra.gov.uk/Default.aspx?Module=More&Location=None&ProjectID=20212&FromSearch=Y&Publisher=1&SearchText=eq0121&SortString=ProjectCode&SortOrder=Asc&Paging=10>

⁸ Costa Coffee, McDonald's, Caffè Nero, Pret A Manger, Greggs, Burger King, Pure and Lavazza Professional.

⁹ Fisher. Signaling change: Studying the effect of price signals on disposable hot beverage cup consumption. Honors thesis. Tufts University, Medford. 2008.

¹⁰ Sidhu et al. Single-use items reduction: Disposable cups. UBC Social Ecological Economic Development Studies (SEEDS) Sustainability Program. 2018.

impact than reusable cup discounts on driving uptake of reusable cups, though this could be due to a lack of awareness of discounts.

The Environment Act introduces powers in England and Wales to place charges on single-use items, which could be used to introduce a charge in the future. The aim of this charge would be to increase the use of reusable cups, in line with the waste hierarchy. We also want to see a reduction in the numbers of cups that are littered.

23. Would you support the government consulting on a proposal to introduce a charge for single-use cups?

- Yes
- No
- Don't know

Please give reasons and supporting evidence.

24. Do you think this charge should be for both hot and cold drinks?

- Yes
- No
- Don't know

Please give reasons and supporting evidence.

25. Do you think this charge should apply to businesses of all sizes?

- Yes
- No
- Don't know

Please give reasons and supporting evidence.

26. Are you aware of any situations where the use of a single-use cup is essential and could be considered for exemptions from the charge in the future? E.g., because of business location, business type, type of product in the cup. Please give reasons and supporting evidence.

Additional items

We are interested in seeking your views on future targeted action. Please provide evidence in support of your response, including the environmental impact of these items.

24. Please state any further single-use plastic items that you think should be considered for targeted future policy actions, and your reasons for this.

25. Regarding any additional items that you have provided, are you aware of any environmentally friendly alternatives that could be used instead?

Re-use and refill

In line with the waste hierarchy (priority goes to preventing the creation of waste, followed by preparing waste for reuse; to recycling, and then recovery, with disposal regarded as the worst option), we would like to see a shift away from single-use items to reusable or refillable alternatives. Therefore, in this section, we are scoping out views on how this could be achieved.

26. What are the barriers to reuse and how could they be addressed? Please provide any supporting evidence.

27. What are the barriers to refill and how could they be addressed? Please provide any supporting evidence.

28. How can government incentivise increased reuse and refill?

29. How could businesses incentivise customers to support reuse and refill?

30. Please provide information about any successful case studies of reuse and refill.

31. Would you support the government consulting on regulating that restaurants cannot provide customers with any single-use products in eat-in settings? The existing exemption for straws would remain.

- Yes
- No
- Don't know

Consultee feedback on the online survey

Thank you for taking your time to participate in this online survey. It would be appreciated, if you can provide us with an insight into how you view the tool and the area(s) you feel is in need of improvement, by completing our feedback questionnaire.

Overall, how satisfied are you with our online consultation tool?

Please give us any comments you have on the tool, including suggestions on how we could improve it.

- Very satisfied
- Satisfied
- Neither satisfied nor dissatisfied
- Dissatisfied
- Very dissatisfied
- Don't know

Please give us any comments you have on the tool, including suggestions on how we could improve it.