

Consultation on proposals to ban the distribution and/or sale of plastic straws, plastic stemmed cotton buds and plastic drink stirrers in England

The Greater London Authority, on the behalf of the Mayor of London, welcomes the opportunity to respond to the consultation on the banning of plastic straws, plastic stemmed cotton buds and plastic drink stirrers in England.

The Mayor is committed to cutting unnecessary single-use plastics in the capital and in the Mayor's London Environment Strategy, has set an ambition for London to be a zero-waste city. By 2026 his aim is for no biodegradable or recyclable waste to be sent to landfill, and by 2030 for 65 per cent of London's municipal waste to be recycled. To contribute to achieving these, the strategy sets out clear objectives, policies and proposals to significantly cut food waste and single-use plastics, boost household waste recycling performance, and take a circular economy approach to avoid materials becoming waste in the first place.

The Mayor is taking a lead in London and delivering a number of activities to achieve this including:

1. City Hall has successfully phased out single-use plastic items from the catering outlet and staff welfare facilities, such as, single-use plastic bottles; cutlery and drink cups. Plans are in place work with the rest of the GLA Group to phase out these items by spring 2019, dependent on contractual agreements.
2. The Mayor launched a programme of work to focus on reducing the impact of single-use plastic bottles. This includes:
 - A pilot water refill scheme in five areas in London. Over 2,000 refill points are now available in London.
 - Installing 20 new drinking water fountains across the city through a pilot with Zoological Society of London's #Oneless campaign;
 - A new £5 million partnership with Thames Water to install over 100 more drinking water fountains over the next three years.
3. As part of the Mayor's Entrepreneur Programme, new innovative products and services that reduce environmental impact have been incubated and supported. Last year's winners were two London University students that created a product called 'Twipes' – eco-friendly plastic free antibacterial wipes that dissolve in water in 3 hours.

The three sections in the consultation document have been answered and grouped where the same questions have been asked for each separate item; plastic straws, plastic stemmed cotton buds and plastic drink stirrers.

In summary:

- The Mayor supports a ban on unnecessary single-use plastics in plastic straws, plastic stemmed cotton buds and plastic drink stirrers in England, and for this ban coming in from 2019.
- However, any ban on materials needs to ensure the relevant industry can provide suitable and sustainable alternatives that do not continue to pollute the environment, have a lower carbon foot print and that needs of specific groups and communities, such as those with medical needs, are taken into consideration.

1. Would you like your response to be confidential?

No

2. What is your name?

Greater London Authority

3. What is your email address?

adam.batchelor@london.gov.uk

4. What is your organisation?

Greater London Authority

5, 29 and 39. It would be helpful for our analysis if you could indicate which of the 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

6, 30 and 40. Do you support the proposal to introduce a ban on the distribution and/or sale of plastic drinking straws, plastic stemmed cotton and plastic drink stirrers in England?

Yes

• Please give reasons.

Our linear economy (take, make, use and dispose) is unsustainable, and produces too much waste. Around 7m tonnes of waste comes from London's homes, public buildings and businesses each year, with too much going to landfill and incineration. Of this, only 41 per cent is currently recycled and performance has stagnated. Landfill and incineration are undesirable, costly and an inefficient use of resources. The capacity of landfills accepting London's waste is expected to run out by 2026 and London's waste bill is now more than £2bn a year and rising.

GLA modelling has shown the cost savings of reducing single-use packaging and food waste by 20% could cut London's waste bill by £42m. This demonstrates the scale of the opportunity at hand to not only tackle plastic drink straws, cotton buds and stirrers but the wider single-use plastic waste stream¹. Plastic also blights our streets and finds its way into oceans, harming wildlife and taking centuries to break down whilst releasing toxic chemicals.

We would classify single-use plastics (e.g. a single-use carrier bag, plastic straws) as: items which are designed for a single usage purpose only; are made, used and then disposed and items that cannot be easily recyclable and therefore are not circular.

- Single-use plastics present a substantial problem in London mainly due to the following:
- single-use plastics have little or no value to either producer or consumer; there are limited viable reusable alternatives and large quantities end up in the final disposal streams where they are increasingly incinerated, thus emitting more CO₂e than they displace through

¹ https://www.london.gov.uk/sites/default/files/london_environment_strategy_0.pdf

energy generation²the higher cost of recycling and disposing of single-use plastics which often require an industrial process to recover the plastic where it is recycled into material that has less value and a lower grade plastic (downcycled)

- when single-use plastics are not properly disposed, they can litter our parks, streets and end up in our waterways, polluting the marine environment and our food chain.
- the amount of single-use plastic items which end up in the Thames. In a recent study 47% of items found were food related and 33% toiletries.³

We therefore support plans to reduce unnecessary single-use plastic items.

In relation to the specific items being consulted on (plastic drinking straws, plastic stemmed cotton and plastic drink stirrers), we support the proposed ban in principle. However, any ban on materials, such as plastic straws, needs to ensure the relevant industry can provide suitable and sustainable alternatives that do not continue to pollute the environment and have a lower carbon foot print. The wider policy for the ban should ensure research and development is prioritised for sustainable and low carbon alternatives.

Furthermore, the Mayor's Equality, Diversity and Inclusion Strategy is clear that goods and services should be made available to all Londoners inclusively. This means the needs of specific groups and communities should be taken into consideration. Fifteen percent of London's population is disabled, and it is vital to ensure those who require plastic straws, for medical or specialist uses, can continue to acquire them without attracting a price premium.

Full and further consultation is recommended with business groups, functional bodies, trade associations and disability stakeholders, for example, to provide the evidence to confirm the timescales and mechanics needed to introduce a ban.

In addition to the specific items being consulted to, the Government should consider reducing other unnecessary single-use plastic items and that are hard to recycle. For example, food related plastic (tooth picks and cutlery) and products with plastic content such as wet wipes. Again, any bans on these products should ensure that sustainable alternatives that do not continue to pollute the environment and have a lower carbon foot print are available, and that needs of specific groups and communities should be taken into consideration.

7, 31 and 41. Do you agree with our proposed date for the ban (October 2019)?

Yes

- **If no please explain why.**

We would support the earliest date for the ban that allows the considerations set out in our response to questions 6, 30 and 40 to be fully understood and effectively incorporated.

8. Do you support a ban on beverage carton straws?

Please see answer under question 6 and 7

² Section 3. EPS Update report 2017 https://www.london.gov.uk/sites/default/files/gla_eps_update_2017_final.pdf

³ <https://www.thames21.org.uk/thames-river-watch/litter-monitoring-results/>

- **Would you support a ban on beverage carton straws coming into effect later than October 2019? If so, how much longer? (April 2020 / October 2020)**

See answer to question 7.

9. Should the government begin with a targeted ban on the distribution of straws with a longer-term view to extending it?

- **If so, how would this work in practice?**

See answer to question 7.

10. If pursuing a broader ban including the sales of straws, do you agree with the proposal to exempt plastic straws for medical-enabling and other specialist uses from any ban? ·

Yes

- **Please give reasons**

The GLA would support exemptions for uses justified by medical or specialist reasons and where other materials would not be suitable.

These special uses should be clearly defined, and definitions should recognise that alternatives may come forward in the future so should be kept under review to incentivise research and development.

11. Do you agree with the proposal to provide exemptions for wholesalers to import and stock plastic straws for distribution to, pharmacies and pharmacy departments in retail outlets and other users for medicinal and specialist uses? ·

Yes

- **Please give reasons**
- **Please provide any supporting examples, evidence or consideration of implications.**

Please see answer to question 10.

12. Should the government allow / exempt catering establishments (such as pubs, cafés and restaurants) to provide plastic straws to customers on a specific 'on demand' basis? · Yes / No

Yes

- **Please give reasons**
- **How should this exemption operate in practice?**

However, the exemption balance the needs of customers with medical and/or other specialist needs and the effective implementation of this policy. See answer to question 7 and 10.

13. If your answer to question 6 was 'Yes' who should be able to supply to catering establishments?

- **Pharmacies only**

- **Pharmacies and wholesalers.**

See answer to question 7 and 10.

14. Should online pharmacies be able to supply plastic straws?

See answer to question 7 and 10.

15. Are there any other groups for whom the alternatives to plastic drinking straws might be unsuitable? Please specify:

See answer to question 10. A full equalities impact assessment needs to be carried out to ensure people are not adversely affected by the ban. This will need to suggest what reasonable measures are needed to mitigate any impacts.

- **Are there any purposes not included in the exemptions where the alternatives to plastic drinking straws are not suitable?**

N/A

16. Are there any other steps government should take to ensure those with accessibility needs are not disadvantaged or stigmatised?

Full and detailed consultation with groups with accessibility needs and who could be affected by this provision should be undertaken. These groups should be confident they will not be disadvantaged or stigmatised by this policy.

17, 32 and 42. Do you agree that the ban should cover all compostable and biodegradable plastic (such as PLA)?

Yes. We do not support the use of plastics which simply break down into smaller pieces of plastic in the environment. The government should be clear that the most environmentally beneficial approach is to reduce the production of single-use plastics in the first place. Developing alternatives to current single-use plastic items in use now (or their manufacturing processes) should be a priority. There are alternatives being developed in the UK and globally and the government should look to support our universities, other research institutions and businesses to research, develop, trial and scale up such alternatives.

A definition/plastic product categorisation (like the European Waste Category codes) would be useful to enable better definition of products and composites that are harmful to the environment, promote eco-design requirement and allow enough flexibility for alternative product innovation.

18. Do you agree with the government's assumptions (outlined in the accompanying Impact Assessment) that the number of straws made of plastic will fall from 95% in 2018 to under 5% by 2020 if a ban is enacted in October 2019? If not, please supply any evidence or modelling that you may have undertaken.

The GLA has not undertaken any research in this area and does not hold data to confirm the government's statistics.

19, 33 and 43 Do you anticipate any additional costs and or constraints to industry from this proposed ban?

The GLA does not hold data like this to confirm or to provide evidence to this question. Full and detailed consultation with trade bodies and industry should be undertaken.

20. Should we expect non-plastic straw use/ consumption to decrease?

Without additional financial levies (like the plastic bag charge) and public waste reduction campaigns it appears reasonable to assume disposable straw use will remain constant.

21, 37 and 45. Our proposals for enforcement are that the ban will be enforced through civil sanctions set out in Part 3 of the Regulatory Enforcement and Sanctions Act 2008.

Who should enforce the ban? (for example, Local Authorities, Trading Standards or Office for Product Safety and Standards)

• How should compliance with the ban be monitored?

An audit trail is essential to measure effectiveness, monitor exemptions and seek improvements in policy. However, it is unlikely that local authorities would be able to enforce this ban without additional resources.

We would propose that wholesale businesses and organisations who are permitted to sell or give away plastic straws, should publish their sales or usage figures annually, like the plastic bag levy.

• Who should enforce the ban? (for example, Local Authorities, Trading Standards or Office for Product Safety and Standards)

With limited resources within regional and/or local government to enforce such a ban, we strongly recommend responsibility for enforcement lies elsewhere or specific resources are made available.

22, 34 and 44. Are there any risks that alternatives to plastic straws, plastic stemmed cotton buds and plastic drink stirrers will themselves have significant environmental impacts?

• If so, how could these risks be avoided, minimised or mitigated? Please supply any evidence you may have to support your suggestions

The impact assessments use Greenhouse Gas (GHG) conversion factors. However, this methodology does not take into account a full life cycle analysis. For example, post production activities, such as, waterproofing/waxing of paper which will have further GHG emission implications.

The ban needs to ensure that alternatives are scientifically tested to ensure that they are not impacting the environment in similar, or different ways. For example, new alternatives design to plastic straws may contain more hard-to-recycle plastic such as a drink aperture on drink cartons or pouches.

23, 38 and 46. Is there anything else you would like to tell us relating to the proposed ban on the distribution and/or sale of plastic drinking straws, plastic stemmed cotton and plastic drink stirrers?

N/A

With respect to the accompanying impact assessment:

24. Do you agree with the government's estimation that the number of straws made of plastic will fall gradually from 95% in 2018 to 3% by 2026 even if a ban was not enacted in October 2019?

The GLA has not undertaken any research in this area and does not hold data to confirm the government's statistics.

25. Do you agree with government's 44 million straws (about 1% of existing straws) will still be required for exemptions following a ban?

The GLA has not undertaken any research in this area and does not hold data to confirm the government's statistics.

26. Do you agree with the government's estimation of business costs or constraints to industry from a ban as a total of £4.3m per year because alternatives cost around 4 times as much as plastic straws?

The GLA has not undertaken any research in this area and does not hold data to confirm the government's statistics.

27. Do you agree with the government's assumption that the price of non-plastic straws will remain unchanged following a ban?

The GLA has not undertaken any research in this area and does not hold data to confirm the government's statistics.

28. Do you agree with the government's assumption that overall demand/consumption of straws will remain unchanged (hence no behavioural response from a ban)?

We believe that without additional financial levies (like the plastic bag charge) and public waste reduction campaigns it seems reasonable to assume consumption of straws will remain constant.

35. Do you agree with our proposals to exempt plastic stemmed cotton buds for scientific uses? (For example, those used within forensic science provision, including taking swabs and samples under the Police and Criminal Evidence Act 1984).

The GLA would support exemptions for uses justified by specific scientific requirements where other materials would not be suitable.

These special uses should be clearly defined, and definitions should recognise that alternatives may come forward in the future so should be kept under review to incentivise research and development.

36. Are there any uses of cotton buds where there is no suitable alternative to a plastic stem?

N/A