



SAS Community Guidance: Single use plastic Consultation (England)

The Government are currently asking whether the following items should be banned in England:

- Plastic plates, bowls and trays
- Plastic cutlery
- Plastic balloon sticks
- And containers made of expanded polystyrene

The consultation is open to everyone and a great opportunity to make sure the government hears the views of people out there tackling plastic in the real world.

What can you do?

At SAS HQ we are submitting a response in support of these bans with all the evidence we have gathered over the years. We hope you will add your voice by submitting your own response.

This note sets out how we have responded and provides some handy facts and figures that will help you with your response. It also provides some things to think about when you answer each question.

Your response will be so much more powerful if you use examples from your own experience or business so please use this document as a prompt rather than using it to copy and paste from.

There are 2 parts to the consultation. The first 10 questions are more general and are focused on whether you support the ban. The second part of the consultation contains more detailed questions on the Impact Assessment which accompanies this consultation.

This guidance will help you to respond to the first section of the consultation. But feel free to answer the second set of questions if you wish (**warning:** there are 3 different impact

assessment documents which add up to about 60 pages). You don't have to answer all the questions to make your voice heard.

How to respond

1. To submit your response head to <https://consult.defra.gov.uk/environmental-quality/consultation-on-proposals-to-ban-comm-only-littered/consultation/intro/> and simply fill in the questions.
2. To read the consultation document head to <https://consult.defra.gov.uk/environmental-quality/consultation-on-proposals-to-ban-comm-only-littered/>
3. The deadline for submission of responses is **12th February 2022**

Questions

The first five questions are about your personal info so we will leave that to you. The next page contains more info about the proposals so give these a read before moving on.

Now it's time to answer the questions. We have copied over the questions below and included some suggestions of what to include in your response and some other things to think about to make your response more personal.

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

- Agree
- Disagree
- Don't know

We agree. (not much else to add)

7. Do you agree or disagree with the proposal to introduce a ban on the supply of the following single-use items in England? Please give reasons and any supporting evidence (optional).

	Agree	Disagree	Don't Know
Plastic plates only			
Plastic plates, including plastic bowls			
Plastic plates, including plastic trays			
Plastic plates, including plastic bowls and plastic trays	X		
Plastic cutlery	X		
Plastic balloon sticks	X		
EPS food containers	X		
EPS beverage containers	X		

Yes, we agree with the proposed bans.

This is because items like these are regularly found by Surfers Against Sewage volunteers who take part in beach, river, street and mountain cleans across the country.

In 2018 over 36,000 volunteers removed 63 tonnes of plastic pollution from UK beaches, 27% of this was avoidable plastic. As part of the 2021 Million Mile Clean 150,000 volunteers removed 400,000 kilos of pollution from over 1,100,000 miles of beaches, mountains and rivers. Much of which was single-use plastic pollution such as plates, bowls and balloon sticks.

Things to think about in your answer:

- Have you organized your own cleans? How many? How much material did you remove?
- Do you frequently see any of these items in the environment?
- In your own life/community/business have you already stopped using these items?
- Do you know of a local café or fast food restaurant which uses these items? Is there a problem with these items in the environment nearby?
- What effect does plastic pollution have on your health and wellbeing when you are confronted by it?

8. We propose the ban should cover all single-use 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	All	None
Plastic plates				X	
Plastic cutlery				X	
Plastic balloon sticks				X	
EPS food containers				X	
EPS beverage containers				X	

We agree single-use plastics in all their forms should be banned.

This is for three key reasons:

1. There is no standard for what bio-based, compostable, and biodegradable actually means. Many think that this material will simply decompose in your compost bin at home. However, often that's not the case. Most compostable plastics need high temperature industrial composting facilities to properly breakdown and very few places have these facilities which mean bioplastics often end up in landfills or incinerated anyway.
2. Because the term is confusing it can lead to more littering with people assuming the material will just decompose in the environment.
3. Making single-use bioplastics etc. still requires lots of energy, land, water and fertilisers. This all contributes to climate change and reduces biodiversity.

Things to think about:

- Instead of using bioplastics, what reusable items have you used instead?
- Do you see just as many bioplastics on the beaches and streets as you see normal plastics?

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

	Agree	Disagree	Don't know
Exclude plates used as packaging		X	
Exclude plates used as packaging, with the exception of those used in 'eatin' settings		X	

We disagree with these exemptions and argue that's ban should be applied on all plastic plates. This is because single-use items have the same potential to cause harm to the environment through carbon emissions and pollution in whatever form they are provided to the consumer.

It is therefore important to tackle single-use items in all settings to ensure a cultural shift away from single-use and towards refill and reuse alternatives.

Impact on alternatives to banned items

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

- Yes – Go to question 11
- No – Go to question 12

If you run or work for a business that supplies these items you can answer question number 6 but if not just skip the next question.

11. In the event of a ban on the proposed items, which product(s) would you provide to customers as an alternative? Please tick all that apply.

	Paper/card (single-use)	Wood (single-use)	Reusable alternative	Other alternative (please specify)	Will not supply any alternative
Plastic plates			X		
Plastic cutlery			X		
Plastic balloon sticks			X		
EPS food containers			X		
EPS beverage containers			x		

Things to think about:

- If you have already shifted away from plastic and single-use items this would be a good opportunity to highlight what you have done and what benefits this has had for your business and customers.
- However, if you are still using these items we would recommend that rather than switching to other single-use items like paper or wood that you offer reusable alternatives, or ask that customers bring their own reusable items.
- You can find plenty of help on how to do this when you become a [Plastic Free Community Business Champion](#)

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

(If you think an alternative will have a significant environmental impact, please specify the alternative. Please provide supporting evidence. If so, how could these risks be avoided, minimised or mitigated? Please supply any evidence to support your answer.)

	Yes	No	Don't know
Plastic plates	X		
Plastic cutlery	X		
Plastic balloon sticks	X		
EPS food containers	X		
EPS beverage containers	X		

There is a risk that banning single-use plastics alone may lead to business simply switching to using other single-use alternatives such as paper and wood.

These items may have equal, or in some cases higher, energy costs to produce and their increased use will undermine efforts to tackle climate change. For example, switching all plastic packaging to other materials currently used for packaging in the UK could almost triple associated carbon emissions.

This however doesn't mean we shouldn't introduce these bans. Instead we need to ensure plastic reduction is not looked at on its own but as part of a wider drive to reduce consumption of all non-essential single-use items. As part of this government should look to support and incentivise businesses to adopt reuse alternatives.

Things to think about could include:

- What could the government do to support you to move away from single-use items?
- Could grants to buy reusable alternatives help?

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.

	Geographic location	Socioeconomic status	Type of job	Protected characteristic	Other (please specify)	No	Don't know
Plastic plates						X	
Plastic cutlery						X	
Plastic balloon sticks						X	
EPS food containers						X	
EPS beverage containers						X	

It is important that measures to reduce plastics do not impact marginalised communities such as people with disabilities. Surfers Against Sewage however have not identified any particular groups that this proposed ban will have a negative impact on.

If you think otherwise please feel free to include it here.

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

	Yes	No	Don't know
Plastic plates		X	
Plastic cutlery		X	
Plastic balloon sticks		X	
EPS food containers		X	
EPS beverage containers		X	

We have not come across any need for exemptions to this ban.

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.

	Agree	Disagree	Don't know
Plastic plates	X		
Plastic cutlery	X		
Plastic balloon sticks	X		
EPS food containers	X		
EPS beverage containers	X		

We know businesses will need time to get ready for the introduction of these bans. However, we know that the transition is already well underway. Plastic Free Communities have already helped

to remove 43.3 million single-use plastic items and there are currently over 4,000 Surfers Against Sewage Plastic Free Business Champions who have already taken significant steps to move away from single-use plastic items. This clearly demonstrates both business desire and ability to deliver rapid change.

We therefore think the introduction of these bans should be brought forward. Scotland are set to introduce an equivalent ban in June 2022 and England should look to match this example.

Things to think about could include:

- In your business or community how long did it take to move away from single-use plastics?

Impact assessment

The next bunch of questions are detailed questions based around the accompanying impact assessments which unless you have got lots of time we won't ask you to answer in full.

But if you can respond as part of a business it would be good to answer questions 23 and 25 to highlight that you have, or will move to using reuse alternatives rather than buying single-use alternatives.

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

Seek to buy single-use plates and cutlery made of alternative material domestically	
Seek to import single-use plates and cutlery made of alternative material	
Don't know	
Stop using single-use plates and cutlery in your business	X

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

Seek to buy containers made of alternative material domestically	
Seek to import containers made of alternative material	
Don't know	
Stop using containers in your business	X