

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

November 2018

1. Would you like your response to be confidential?

N

2. What is your name?

Christina Wells

3. What is your email address?

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4. What is your organisation?

Heart of London Business Alliance

5. 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):

- Other (not for profit Business Improvement District)

6. Do you support the proposal to introduce a ban on the distribution and/or sale of plastic drinking straws in England?

Yes

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

Yes

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

Yes, the impacts of any plastic straw on the environment are the same therefore this exception to the sale and purchase does not need to be different. If such cartons are imported for sale this will have a bigger more effective impact and encourage other countries to participate given that the majority of plastic ocean waste is sourced from southern Asia.

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)

Yes, as this would support the retail and purchasing chains to adapt to the change.

Please share any evidence or views on the potential design and marketing implications of a ban on beverage carton straws.

If the plastic straw on a beverage carton can be designed-out then this would be a practical global solution. Implementing a ban on carton straws will help to push forward innovative designs for this.

Please share any evidence or views on the potential implications and costs for imports and supply chains

If less material (plastic) is needed for the cartons the weight difference and disposal would be minimal although less materials could lead to a decrease in the cost of the product for purchasers.

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

No, this is not needed. To align a single message and for the communications to those affected to be nationwide it would have a quicker and less longer-term resource needed to implement. The benefit to a slow roll out for banning low cost items such as plastic straws where there are suitable alternatives already on the market is not tangible.

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. Until a suitable alternative is found for the specialist uses this concept is supported. By introducing this ban (with medical and specialist exception) a trend or change in design, use of materials and supply chain may encourage design of a suitable alternative.

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, this proposal is practical.

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?

No, there are suitable alternatives such as paper straws for any catering establishments and a lot of Heart of London Business Alliance members already implement these such as McDonalds, Weatherspoons and The Cavendish Hotel.

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

No, this may affect the integrity of the ban if not regulated correctly. If straws are needed for specialist reasons there are other ways for them to be distributed rather than online.

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

No, no others than those mentioned in the ban exemption

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

Government offered straws could be a specific colour or brand to identify the specific need of the individual.

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

Yes

Please give reasons and any evidence that might be helpful. Are there environmental or economic reasons why these should not be banned?

Biodegradable plastic has many impractical considerations. Firstly, it has a very confused perception to the public who may not dispose of it to its fullest potential therefore damages any environmental credential the product has. Secondly the conditions needed for biodegradable plastic to degrade is specific and not widely facilitated therefore quite a niche disposal technique.

<https://www.theguardian.com/environment/2016/may/23/biodegradable-plastic-false-solution-for-ocean-waste-problem>

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

Yes the Impact Assessment is credible and based on the results of the plastic bag tax there is supporting evidence to suggest this large scale impact.

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

Not if implemented correctly with advanced notice for affected industries.

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

Yes

21. 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. How should compliance with the ban be monitored? Who should enforce the ban? (for example, Local Authorities, Trading Standards or Office for Product Safety and Standards)

Trading standards should enforce the ban. Non-compliance of the ban will likely be stigmatised therefore public and other businesses should have a way to report non-compliance to the monitoring body.

22. Are there any risks that alternatives to plastic straws 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.

Yes, as waste is still produced using straws despite the material, given the nature of disposal currently used. Alternative materials still need to be disposed of unless they are re-usable. Promotion of re-usable straws (such as metal ones) could be incorporated into messages with the ban to mitigate changing the waste stream of straw waste from plastic to paper. If the focus of the plastic straw ban message is on reducing waste altogether it will have a greater impact on waste minimisation.

23. Is there anything else you would like to tell us relating to the proposed ban on the distribution and/or sale of plastic straws?

Collectively, the business community is supportive of banning items such plastic straws, demonstrated by the current self-imposed changes that have already happened to many pubs and hospitality businesses. Businesses are keen to demonstrate their commitment to the environment and would be encouraged to see the government to support these plans.

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?

No, there is no evidence to suggest that this will change without a ban however we are unable to provide evidence to support a counter argument.

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

Yes given the current market and infrastructure in place for these exemptions.

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?

Yes, this is a balanced estimate given current markets. However as alternatives are sourced and a waste minimisation in relation to these products could potentially see a lower figure. No evidence available to support this hypothesis.

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

Yes

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)?

No, but only if the correct waste minimisation message is put across during the implementation of the ban. This would be hard to quantify.

29. N/A as above

30. Do you support the proposal to introduce a ban on the distribution and/or sale of plastic stemmed cotton buds in England?

Yes, partly. As per plastic straws there are already alternatives on the market to replace these items therefore a suitable alternative with an infrastructure already in place and a ban would help to reduce current environmental impacts. The proposal for exemption is not needed therefore only a partial agreement. There are no suitable exemptions to the ban.

31. Do you agree with our proposed date for the ban (October 2019)

Yes

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

Yes. As per Q17 the same applies: Firstly, it has a very confused perception to the public who may not dispose of it to its fullest potential therefore damages any environmental credential the product has. Secondly the conditions needed for biodegradable plastic to degrade is specific and not widely facilitated therefore quite a niche disposal technique. <https://www.theguardian.com/environment/2016/may/23/biodegradable-plastic-false-solution-for-ocean-waste-problem>

33. Can you provide supporting evidence of any expected additional costs and or constraints to industry from this proposed ban?

No

34. Are there any risks that alternatives to plastic stemmed cotton buds will themselves have significant environmental impacts?

Yes. Research has shown that plastic stemmed cotton buds are found present on beaches and in water systems due to a large proportion being thrown down the toilet. This is not a correct method of disposal and only highlights potential pressures on the sewage system.

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)

No, there are no feasible reasons for exemptions to banning plastic stemmed cotton buds.

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

No

37. 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. How should compliance with the ban be monitored? Who should enforce the ban? (for example, Local Authorities, Trading Standards or Office for Product Safety and Standards)

As per Q21: Trading standards should enforce the ban. Non-compliance of the ban will likely be stigmatised therefore public and other businesses should have a way to report non-compliance to the monitoring body also.

38. Is there anything else you would like to tell us relating to the proposed ban on the distribution and/or sale of plastic stemmed cotton buds?

The business community is supportive of the ban given the environmental impact of these materials and that a suitable alternative for consumers already available.

39. N/A as per above

40. Do you support the proposal to introduce a ban on the distribution and/or sale of plastic drink stirrers in England?

Yes. This supports the ban for plastic stemmed cotton buds and plastic straws. There are suitable alternatives in place and the quantity, cost and impact to changing these materials is relatively small scale.

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

Yes

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

Yes. As per Q17 and Q32 the same applies: Firstly, it has a very confused perception to the public who may not dispose of it to its fullest potential therefore damages any environmental credential the product has. Secondly the conditions needed for biodegradable plastic to degrade is specific and not widely facilitated therefore quite a niche disposal technique. <https://www.theguardian.com/environment/2016/may/23/biodegradable-plastic-false-solution-for-ocean-waste-problem>

43. Can you provide supporting evidence of any expected additional costs and or constraints to industry from this proposed ban?

No

44. Are there any risks that alternatives to plastic drinks 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

Yes, there are currently wooden stirrers in circulation. These wooden stirrers are still generating waste that cannot get recycled in current infrastructure. This could be mitigated by banning all single use stirrers (regardless of material) and only providing cutlery or for the staff providing it to stir before passing onto the customer taking away the need for any stirrer.

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. How should compliance with the

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

As per Q21 and Q37: Trading standards should enforce the ban. Non-compliance of the ban will likely be stigmatised therefore public and other businesses should have a way to report non-compliance to the monitoring body also.

46. Is there anything else you would like to tell us relating to the proposed ban on the distribution and/or sale of plastic drink stirrers?

Businesses and our members are supportive of proposals such as these that improve the environment with minimal impact to business practice. All of the plastic banning proposals suggested in this consultation have suitable alternatives that lots of our members already implement with awareness to the ultimate environmental impact therefore it is demonstratable to adjust a business model for these items. Government backing of this would be encouraged particularly as it supports the move in direction for sustainable business practices.