Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith / Climate Change, Environment and Infrastructure Committee Bil drafft Diogelu'r Amgylchedd (Cynhyrchion Plastig Untro) (Cymru)/ Draft Environmental Protection (Single-use Plastic Products)(Wales) Bill SUP_22

Ymateb gan Ffederasiwn Plastigau Prydain / Evidence from British Plastics Federation (BPF)

The Environmental Protection (Single-use Plastic Products) (Wales) Bill – BPF Briefing Note

Established in 1933, the British Plastics Federation (BPF) is recognised as the single voice of the UK plastic industry with over 500 members across the plastics industry supply chain, including polymer producers and suppliers, additive manufacturers, recyclers, services providers, end users, plastics processors and machinery manufacturers, representing over 80% of the industry by turnover.

Speaking broadly on the Environmental Protection (Single-use Plastic Products) (Wales) Bill, it is important to note that the UK-wide Environment Bill sets out measures for all single use materials and not just single use plastics. Any new measures should align with this, as switching to alternative materials does not always have the best environmental outcome and should be based on a full Life Cycle Analysis (LCA), and be recyclable at the end of its life. This is also something WaterUK highlighted in their submission to DEFRA's 2022 consultation on commonly littered items when discussing the issue of wet wipes being incorrectly flushed. As an example, although there are alternatives to wet wipes containing plastics, they tend to be made from bamboo, compostable or biodegradable products which are likely to create the same issues in sewers if they are disposed of incorrectly such as littered or flushed down the toilet. Biodegradable and compostable materials require the correct conditions to completely compost or degrade, for example, the correct temperature, time, moisture level and anaerobic activity. Therefore, the policy proposals should discourage the incorrect disposal of plastic items otherwise the approach adopted will not meet the policy objective stated.

Reuse is another area which could aid the reduction in waste. Again, the adoption of reuse models should be based on a full LCAs to ensure that there are no adverse outcomes.

As the items listed in the Bill go beyond those listed in the EU Single Use Plastics Directive and include other 'takeaway containers', it is vital that full LCAs and impact assessments are undertaken to ensure that the items replacing them do not continue to cause littering and other adverse socio-environmental impacts. Legislation should also work holistically with the sustainability landscape, ensuring businesses and consumers have the means to meet other environmental goals such as Net Zero targets, without alternative products setting them back further on this journey.