

Defra Consultation response: Call for evidence on commonly littered and problematic plastic items

Would you like your response to be confidential?

No

2. What is your name?

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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):

Other - National Governing Body

5. If you are responding on behalf of an organisation, what is its name?

Angling Trust

General points

The Angling Trust is recognised by the government as the National Governing Body for angling in England and partner with Visit Wales and Natural Resources Wales to promote fishing in Wales. We are a not-for-profit organisation representing anglers, fighting for fish, fishing and the environment, acting as the voice for some 3 million coarse, game and sea anglers in England.

We welcome Defra's consultation into commonly littered and plastic items in England and the recognition of the need to address litter pollution, which has a significant detrimental impact on wildlife and ecosystems in terrestrial and aquatic environments. We support the ban of all the items outlined within the consultation. However, we are disappointed with the narrow focus of the consultation. We believe more urgent and more comprehensive action is required to address the exponential growth of litter entering our environment. The public is increasingly aware of litter pollution's impact on the environment. Some 81% of the general public are angry and frustrated by the amount of litter present in the environment. Plastic pollution is cited as the top threat to the natural environment in the UK^{1,2}. This demonstrates a public willingness for a step-change in the government's approach to litter beyond the measures outlined within this consultation and the related consultation focused on [banning commonly littered items](#). Below we have outlined a series of additional measures that the government need to implement to ensure a more widespread, strategic approach to tackling all types of single-use plastic.

1. Need to address the 'throw away' culture and encourage a more circular economy

¹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/630999/litter-strategy-for-england-2017-v2.pdf

² <http://www.brightblue.org.uk/wp-content/uploads/2021/07/Nature-positive.pdf>

To make a substantial step towards tackling litter pollution in England, the current ‘throw away’ culture needs to be addressed and measures put in place to encourage a move towards a society that places reuse at its core. Replacing a single-use item with a ‘biodegradable’ alternative perpetuates the ‘use-once’ mentality and maintains the environmental costs that occur during its production and disposal.

Similarly, recycling will not be enough to resolve the current volumes of plastic and litter waste produced in the UK. At present, over 2 million tonnes of plastic packaging is used in the UK each year. Most of this is made from new rather than recycled materials. The government needs to incentivise and encourage a more circular economy, motivating the development of more sustainable, reusable products and materials. To support this, there is a greater need for funding for research into innovative products that includes consideration of the potential environmental costs of production, transport and use.

Reduction targets should be implemented for all products that include plastic, particularly those where there are currently no alternatives. The consumption of these products should be monitored to report progress in meeting these targets. To complement this target, the government should encourage responsible consumer behaviour by educating the public on the availability of reusable or non-plastic alternatives and using awareness-raising campaigns and labelling to highlight the impact of inappropriate disposal on the environment.

The Angling Trust support the proposition to introduce a charge on the use of single-cups (Q23 of the consultation) but feel this could be expanded to include other products. The money raised through this charge should be ring-fenced and dedicated to funding projects that remove litter from the environment and research new reusable alternatives.

2. Develop infrastructure to enable recycling of a wide range of products by manufacturers and the general public

In 2018, the UK generated 222.2 million tonnes of total waste, with England responsible for 84% of the UK total³. The current waste management systems in the UK do not have a sufficient capacity . Greater funding is required to support the development of infrastructure and innovative technologies to recycle plastic and other litter waste. A significant proportion of recycled waste is shipped overseas, contributing to other environmental impacts through carbon emissions. Therefore, this funding should focus on efforts that will facilitate the recycling of materials within the country.

In addition to this, greater efforts are required to support household waste recycling. In 2020, total ‘waste from households’ in the UK was 22.6 million tonnes, equivalent to 399 kg per person per year⁵, with recycling rates in households in England less than 50%⁴. To decrease the volume of litter entering landfill, there is needs to be focused efforts to educate the public and encourage responsible recycling at home. The government’s 2017 Litter Strategy for England recognised the

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1002246/UK_stats_on_waste_statistical_notice_July2021_accessible_FINAL.pdf

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1002246/UK_stats_on_waste_statistical_notice_July2021_accessible_FINAL.pdf

need 'to improve the quality of waste collection services and make it easier to recycle'⁵. To achieve this, the government will need to provide further resources to local councils to collect and recycle a wider range of products.

3. Implement an Extended Producer Responsibility (EPR) for a wide range of plastic products

We support the proposal outlined within the consultation to include the Extended Producer Responsibility for wet wipes and tobacco filters. However, we feel this should be extended to include a broader number of products that contain plastic. Having a mandatory take-back obligation for businesses that produce products for the market would incentivise manufacturers to review their product designs. The EU Directive on Single Plastic Pollution included information on the scope of the EPR, including producers covering the costs of 'waste management clean up, data gathering and awareness raising'. We feel the government should ensure the EPR includes these measures to help educate consumers and assist in the clean-up of litter already present in the environment. The EPR should complement the focus on a shift to reduce waste within the industry and a focus on driving the development of reusable products.

4. Have a clear strategy that tackles litter that is already present in our environment

Alongside measures to address production, there also needs to be a clear strategy on how England will deal with the vast volume of plastic already present in our system. At present, nearly 700 marine species and more than 50 freshwater species have been found to have ingested or become entangled in macroplastics^{6,7}. The UK has not achieved its aim for Good Environmental Status for litter under the Marine Strategy. Surveys of UK coastlines found trends in beach litter were stable in Celtic Seas but slightly increased in the Greater North Sea, with the predominant litter material being plastic.⁸

Our rivers and oceans act as sinks for litter. Here the plastic debris gradually breaks down into smaller sized particles, which present a human health risk, and the plastics are inhaled or ingested by aquatic species and enter the food chain. The presence of litter is also unsightly and negatively impacts people's feelings of wellbeing and safety. The government must allocate dedicated resources to remove litter already present in the environment and recycle these materials where possible. Some initiatives such as the Anglers National Line Recycling Scheme (ANLRS) demonstrate an approach where this can be undertaken for certain materials, with old fishing line and commercial nets collected through beach cleans being collected and sent off to be recycled into new products. The economic cost-benefit ratio for removing litter from the UK compared to allowing it to persist in the environment is +1.2 to +1.8⁹. The government should provide dedicated funding to support initiatives such as the ANLRS and provide other infrastructure and resources to facilitate the removal of litter pollution.

5. Resources and funding provided to support the single use ban and discourage littering

The Angling Trust welcome the inclusion of litter enforcement in the Environment Act. To ensure bans on single-use products are followed, adequate funding and resources must be provided. This includes

⁵ <https://www.gov.uk/government/statistics/local-authority-collected-waste-management-annual-results>

⁶ S. C. Gall, R. C. Thompson, The impact of debris on marine life. *Mar. Pollut. Bull.* **92**, 170–179 (2015).

⁷ C. M. Rochman, M. A. Browne, A. J. Underwood, J. A. van Franeker, R. C. Thompson, L. A. Amaral-Zettler, The ecological impacts of marine debris: Unravelling the demonstrated evidence from what is perceived. *Ecology* **97**, 302–312 (2016)

⁸ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/921262/marine-strategy-part1-october19.pdf

⁹ https://www.researchgate.net/profile/Jeo-Lee/publication/283680054_Economic_valuation_of_marine_litter_and_microplastic_pollution_in_the_marine_environment_An_initial_assessment_of_the_case_of_the_United_Kingdom/links/564328df08ae451880a31e52/Economic-valuation-of-marine-litter-and-microplastic-pollution-in-the-marine-environment-An-initial-assessment-of-the-case-of-the-United-Kingdom.pdf

funding to support the charge of fixed penalty notices for littering and depositing, treating and disposal of waste.

Wet wipes

An estimated 11 billion wet wipes are used per year in the UK, with 90% of these containing plastic. Along with the substantial negative impact wet wipes have on environments, they cause approximately 300,000 sewage blockages every year, resulting in significant damage to the water industry infrastructure. They account for more than 90% of material in fatbergs, costing water customers millions to resolve and increase the risk of flooding and pollution from sewer bursts and storm overflows.

We strongly support the proposal to ban wet wipes containing plastic. However, we feel that greater measures are required to tackle this common litter problem:

1. All wet wipes, including packaging, should be biodegradable and compostable as a minimum standard. By biodegradable, we refer to products made from natural materials such as regenerated fibres, wood pulp, and cotton. Currently, some products have been labelled as 'biodegradable' that still contain synthetic fibres, which prevent their breakdown when they are disposed of via the toilet. These products continue to clog up pipes and contribute to fatbergs¹⁰. There is a need to provide and communicate strict guidelines which define what is considered 'biodegradable' to provide clarity to the manufacturers and the public.
2. The Angling Trust support the introduction of mandatory labelling to educate the public on the safe disposal of products. The wording 'Do not flush' should be added to any wet wipe product. The current voluntary water industry 'fine to flush' standard is problematic given that many that are labelled as 'flushable' are currently not fully biodegradable (as outlined above). More importantly, it reinforces the belief that toilets and the sewage system present a rubbish bin for discarded materials, which then enter our rivers and oceans. The disposal of wet wipes and other biodegradable, non-recyclable products should be encouraged through their domestic bin or at designated collection points. We believe labelling should inform consumers that they should not dispose of products down toilets and outline the impact to the environment when wet wipes are disposed of incorrectly. This labelling should be placed clearly on the front of the packaging, standardised, and have a minimum size.
3. There should be targeted efforts to encourage consumers to adopt more sustainable behaviour, using re-usable alternatives where possible. These include but are not limited to reusable and washable cloths and cotton rounds, and compostable wipes. Although products such as wet wipes using bamboo or plant fibres are available and present an immediate alternative to wet wipes with plastic, consideration needs to be given to the environmental impacts associated with these products. For example, what area of land would need to be allocated to enable products to be made from bamboo, as well as carbon emissions generated from shipping and production costs. It is essential that alternative products do not result in greater environmental impacts through additional carbon

¹⁰ https://web.archive.org/web/20210217191101id_/https://assets.researchsquare.com/files/rs-154602/v1/13e9ac00-2acd-4d5f-8954-689bf8d07fc8.pdf

emissions through transport and/or production or require a substantial allocation of land resources.

4. In relation to the proposed exemption for use in medical purposes, the Angling Trust does not have extensive expertise on the use of wipes within the medical industry to provide a comprehensive comment. We recognise that the practice of alcohol wipe use in medical environments differs from every day public use and acknowledge the need to maintain a high standard of care and hygiene within medical environments. Alcohol wipes in medical settings are used for various purposes to disinfect equipment and surfaces. After use, they are collected as clinical waste for burning rather than being disposed of to go to landfill. Although this practice differs to those of wet wipes by the general public, we feel a review should be undertaken to determine the sustainability of current medical practices and the potential to implement alternatives where possible. For example, using recycled paper towels and alcohol spray instead of alcohol wipes may present a suitable alternative in particular scenarios. This would also provide additional benefits through the likely reductions in carbon emissions required to produce the alcohol wipes. Besides using alcohol wipes for medical purposes, we do not feel there should be any other exemptions for the use of wet wipes.

Additional items

As stated above, the Angling Trust feel that a more comprehensive strategy of single-use plastic is required, with efforts expanded to cover a broader range of products as well as encouraging a more circular economy that incorporates reduce, reuse, recycle practices.

Several initiatives have been set up within the UK to recycle plastic products which require funding and support to be maintained. For example, the Anglers National Line Recycling Scheme (ANLRS) is a national scheme set up by anglers in 2018 to tackle recreational fishing line and stop them from entering landfills. So far, this scheme has recycled over 20 million metres of line, which has been turned into new products such as garden planters and rod stands. This initiative is run by a network of volunteers and relies on donations and funding opportunities to continue to run. Similarly, in 2021 the company Waterhaul began a trial in partnership with the NHS in Cornwall in 2021 to recycle used face masks and turn them into litter pickers. The government should provide ring-fenced funding to support initiatives such as these that will help to address plastic issues.