

**CALL FOR EVIDENCE ON A PLAN TO ELIMINATE PLASTIC POLLUTION
RESPONSE**
30 September 2021

Introduction

The systemic cause of plastic waste is disposability. Therefore, measures aimed at preventing unnecessary single use plastic should be prioritized in the proposed Plan to Eliminate Plastic Pollution, in line with the waste hierarchy.

That said, there are also environmental gains to be made from recycling plastic already in circulation however these gains are dependent on the level of contamination of the recovered plastics, therefore the Plan must also consider strategies to optimise the volume of plastic recovered through recycling. Furthermore it must address 'unmanaged' plastic that ends up in the environment through littering and the mishandling of plastic.

The Plan must therefore provide a holistic strategy to the management of plastic waste. Key opportunities include: -

- Banning non-essential single use plastic products
- Financial penalties to promote a reuse culture to deal with avoidable single use packaging (e.g., disposable cup levy)
- Targets to eliminate unrecyclable plastic packaging and use packaging that is fully recyclable or compostable
- Ensuring items containing plastic are better designed for recycling and material recovery with financial responsibility on producers for the recovery of their products (Extended Producer Responsibility)
- More collaboration between sectors on tackling plastic pollution, covering the lifecycle of plastic products (production, consumption, disposal and reprocessing)
- Strong policy to encourage private sector investment in sorting and reprocessing capacity for flexible plastic packaging and bioplastics in Northern Ireland
- Funding and innovative pilots aimed at increasing litter enforcement and education, to reverse the litter culture that exists in Northern Ireland
- Increased collection and sorting of PET bottles and trays, be it via kerbside collection or deposit schemes, to ensure circularity of PET packaging
- Consistent, clear, and universal recycling labeling on products so that citizens know which type of bin to use for which product
- Consistent, clear and universal domestic and commercial recycling protocols through statutory guidance to Councils on minimum service standards for waste management
- More on the go recycling facilities alongside measures to reduce contamination
- Requiring the tourism industry to take responsibility for litter arising from tourism activity

Response

1. Detail any actions that you or your organisation has been involved in with the aim of tackling plastic pollution in Northern Ireland and which could be used as an exemplar in the Northern Ireland plastic pollution plan. Please provide supporting evidence where possible. These actions could range from large scale operations such as implementing a policy or removing single use plastic from an organisation, to smaller grassroots actions, such as organised litter picks.

Sustainable Northern Ireland was involved in the DAERA sponsored 'Tackling Plastic NI' initiative, supporting councils and government to develop strategies to remove single use plastic from their organisations. We circulated template policies, contract clauses, staff engagement and performance management tools to address corporate single use plastic.

Example actions:

- Plastic Reduction Action Plan for the NI government estate
- Refill.ie solutions for plastic free events e.g. bottle-free hydration stations
- Integrated online 'tap map' to signpost the citizens to water refill locations
- Derry City and Strabane mini-deposit return scheme for closed-loop events
- Councils trialling eco-friendly food and drink packaging in local businesses
- Ards and North Down Borough Council 'seabins' and engagement with supermarkets to reduce unnecessary plastic packaging
- Several councils secured funding for water refill stations

Further examples: <https://www.keepnorthernirelandbeautiful.org/cgi-bin/generic?instanceID=62>

2. Have you any plastic pollution suggestions that you would like to include in the Northern Ireland plan which you feel have not been addressed by government or by another scheme? Please provide supporting evidence where relevant.

Reuse as the first line of defence

A system based on reuse will not only reduce humanity's ecological footprint, but also create lucrative new sources of economic value. We therefore support measures aimed at promoting reusable products and packaging over single use items. When re-use isn't possible, eco-friendly alternatives can be provided. In these situations, the appropriate recycling infrastructure must be available to deal with these items (see more on this later).

Proposed measure: *Government can lower the barriers to innovative reuse and recycling companies by developing the necessary infrastructure, establishing regulatory standards and forming public-private partnerships centred on reuse.*

Proposed measure: *Establish a public-private forum to share ideas, inform policy and exchange information between different sectors working to tackle plastic pollution.*

Plastic pollution from the fishing industry

It is reported that a large proportion of the plastic pollution in our oceans comes from discarded fishing equipment. However, there little data available to validate this claim.

Proposed measure: Commission an independent study to review all sources of marine and freshwater plastic pollution in Northern Ireland (not just plastic found on beaches). This would help build an evidence base for the proposed policy options in the Plan to Reduce Plastic Pollution.

Tackling nurdles

Nurdles are small plastic pellets about the size of a lentil. Billions are used each year to make nearly all our plastic products but many end up washing up on our shores. The most effective solution is to tackle this problem at source, working with the shipping and freight industries to stop the loss of pellets into the environment.

Proposed measure: *Work with the UK government to introduce regulations on the shipping and handling of nurdles, to prevent unintended spillages into waterways and oceans.*

Plastic food and drink packaging

All food and drink packaging, whether plastic or another material (e.g. glass or aluminium), has an environmental impact. There is a lot of emphasis on plastic waste and pollution, but other impacts such as carbon emissions must also be considered when determining which materials are most suitable for certain applications. In some cases, plastic may be the most suitable material, if waste is properly managed. A lifecycle approach is necessary to ensure that when producers and retailers are considering packaging materials, they are informed about the wider environmental impacts.

Proposed measure: *Commission a study to compare the environmental impacts of common food and drink packaging materials using a lifecycle approach. The study should review existing research, including on the environmental impacts of production, transportation, and waste management. Rather than pinpointing which materials should be used, this study should present evidence that retailers and consumers can use to make informed choices.*

The failure of plastics recycling

Despite decades of investment in infrastructure and technology in the UK, the overall rate of plastic packaging collected for recycling was just 30% in 2018 (WRAP, WWF UK, 2019). Of this less than half was recycled as much plastic is exported to destinations that are not capable of effective recycling.

When it comes to flexible plastic packaging - of the sort used widely in microwave meals, bags of freezer food and the linings of cereal boxes - the rate of collection and recycling drops to 4% (WRAP 2018). The rest of these materials end up in landfill, incineration, our oceans and natural habitats where they remain for centuries, causing environmental damage.

These materials, because of their light weight and zero value, are extremely difficult to collect and recycle. Moreover, as they are often used for food packaging, they are often stuck to food or contain food, which makes them impossible to recycle in the plastic waste stream.

Compostable packaging

Compostable packaging provides an alternative to materials not suitable for plastics recycling. Compostable materials shift away from the inefficient mechanical recycling stream, into a nature-based solution that biodegrades naturally under composting conditions.

As food waste collection is expanded, government and local authorities need to recognise compostable packaging as part of the waste stream. Very few compostable cups are currently making it to compost. There is an increasing requirement for industrial composting infrastructure to deal with this waste stream alongside clear product labels to provide clarity on which bin to put these products into.

The packaging industry needs to think about end of life, about how these products integrate with the existing system and work with the waste sector to develop a new system to deal with compostable products. The ideal model is to combine anaerobic digestion (AD) with traditional in-vessel composting, as is done in The Maltings in Selby in the UK. Both systems work together, which means there is the energetic value from the compostable products and the food waste, and then the secondary soil remediation benefit from the composting phase.

Another problem is that there is no recognisable standard and timeframe to verify claims made for the biodegradability of packaging materials. By contrast, there are well established British standards for compostable material. It is therefore essential to distinguish between 'biodegradable' and 'compostable' and not use these terms interchangeably.

Proposed measure: *Introduce a recognisable standard for the process and timeframe to verify claims made just for the biodegradability of packaging materials.*

Proposed measure: *Ensure appropriate treatment infrastructure is in place before adding compostable plastics to the core list of materials to be collected for recycling. Until this point, it may be necessary for consumers to be advised to put this type of packaging in the residual waste bin. Longer term, combined AD and IVC infrastructure should be explored.*

Plastic packaging tax

SNI supports the introduction of a plastic packaging tax, as confirmed by the Chancellor at the Budget on 11th March 2020. The tax must treat compostable and conventional plastics differently given their different environmental impact and physical composition.

Proposed measure: *Introduction of plastic tax and clarify the exemption of all compostable plastics, and not just cellulosic compostables, from the application of the Plastic Tax*

Conventional plastic packaging

We support a move toward a reduction in conventional plastic packaging and a distinction between conventional and compostable plastics, to enable the latter in certain uses. Italy, for example, is encouraging a shift to compostable plastic bags by excluding them from the ban on the sale of single-use bags. France mandates the use of compostable fruit and vegetable bags in shops; and plastic bag bans, excluding compostable bags, are in force in many countries, states and cities including China, California, and New York.

Proposed measure: *Set a specific target for reduction in the import and production of conventional single use plastic packaging.*

Charges for carrier bags

The introduction of a levy for carrier bags in Northern Ireland has been a major success in reducing the use of conventional single-use carrier bags, but far too many 'bags for life' are being used. We support proposals to increase the price and scope of the carrier bag levy and suggest an exemption from the plastic bag tax for recyclable and compostable bags.

Proposed measure: Encourage a transition from conventional to reusable carrier bags and include provision to exclude recyclable and compostable bags from the carrier bag levy if industrial recycling and / or composting infrastructure is available.

Charges for all Single Use Plastic Items

We welcome the concept of charges for single-use plastic items. Levies on single-use items at the point of sale will complement the proposed deposit return scheme, to encourage a refill and take back culture. Funds raised through levies and taxes should be ring-fenced for initiatives aimed at waste and litter prevention.

Proposed measure: Introduction of levies or charges for single use plastic items with exemptions for recyclable or compostable items.

Litter prevention

Every year councils spend significantly more on street cleansing than environmental enforcement and education. The Plan must identify funding and support for councils to take a more active role in litter prevention.

Proposed measure: Pilot litter-spy cameras and automated penalty notices to discourage littering on our streets.

3. Have you, or your organisation, any solutions or sources of evidence and expertise that could be used to help eliminate the problem of plastic pollution in Northern Ireland? These could include examples from elsewhere that have benefited or discouraged action on plastic pollution, or any challenges or opportunities you have identified.

Best practice policies

The UN has compiled a list of what other countries are doing – and the success they are having – in a report called [Single-use Plastics: A Roadmap for Sustainability](#). The aim of the report is to give governments a benchmark for effective policy making.

India's Prime Minister has pledged to [eliminate all single-use plastic](#) in the country by 2022, with an immediate ban in urban Delhi. The plan announced by Narendra Modi is by far the most ambitious of any nation to date, due to the sheer size of the Indian population and the fact that the country is the fastest growing economy in the world. Many other European countries have introduced a levy on plastic bags, including Northern Ireland, while China, Kenya and Morocco have implemented a ban on thin plastic bags.

Government levies and bans – when properly planned and enforced – have been among the most effective strategies to limit the overuse of disposable plastic products. However, some countries, such as Bangladesh and Cameroon, have introduced a ban on plastic bags but have not followed through with appropriate enforcement. This can lead to a rise in the black market of the bags, or the use of thicker plastic bags that are not covered by the bans, which can end up causing even more damage to the environment.

Fostering a reuse culture

The [Future of Reusable Consumption Models insight report](#), published by The World Economic Forum's [Future of Consumption Platform](#), highlights innovative solutions for reuse. The report shows that reuse models are not only viable, but also capable of generating added value across the economy. The report lays out three possible scenarios for the development of reuse by 2030. In scenario 1, at least 10% of all packaging would be shifted away from single-use and toward reusables – the equivalent of at least 7 million tonnes of plastic. In scenario 3, as much as 26-46 million tonnes would be shifted away from disposables, and plastic waste would be virtually eliminated from our oceans.

Innovation in the private sector

One of the pioneers of reuse is 'Loop' a subsidiary of Terracycle that is taking advantage of the potential of reuse to create value. Loop has established partnerships with leading retailers to allow customers to borrow brand-name packaging, which is fully recyclable after 20 to 100 uses. Loop has enlisted over 100 brands globally and offers over 400 products through a [reusable system](#).

Chilean startup [Algramo](#) has recently broken into the US market with its innovative refill-on-the-go distribution model. After a one-time container purchase, a customer may refill a range of liquid cleansers from dispensing machines at participating stores. Producers signing onto the program include many household brands.

Governments and NGOs worldwide are partnering with companies to demonstrate reuse models. In Seoul, [Share Hub](#) connects municipal agencies, companies, and residents who can exchange knowledge, present initiatives, and connect with resources to advance circular solutions. [ReLondon](#) is a partnership between the mayor of London and the city's boroughs

that offers grants and consulting advice to businesses seeking to implement reuse programs.

Scale and commitment

Large-scale reuse programmes attain a level of value that a low-scale approach simply cannot match. Achieving that scale will require both ingenuity and commitment from a variety of market participants. The public sector can lower the barriers to companies scaling up these initiatives by developing the necessary infrastructure, establishing regulatory standards and forming public-private partnerships.

Public-private coalitions

[Consumers Beyond Disposability](#) is a multistakeholder initiative facilitated by the World Economic Forum's Future of Consumption platform. It brings together leading private, public and civil society sector actors committed to empowering consumers to access innovative consumption models at scale that offer aspirational, affordable and more sustainable alternatives to single-use.

To do so, the coalition focuses its efforts specifically on reuse and durability-based solutions and provides a platform for stakeholders to identify, guide and enable the testing and scaling of such models. The initiative is designed to drive learning and impact on the ground, partnering with leading cities to model and test the viability of new models in specific geographies.

Consumers Beyond Disposability closely collaborates with other related efforts, such as the [Platform for Accelerating the Circular Economy \(PACE\)](#), the [Global Plastics Action Partnership \(GPAP\)](#) and the Ellen MacArthur Foundation's [New Plastic Economy](#) initiative.

4. Any other comments or contributions that will help inform the plan and the commitment by the NI Executive to eliminate plastic pollution.

We have no further comments.