

Response ID ANON-NTSF-3KQJ-M

Submitted to Consultation on proposals to ban commonly littered single-use plastic items in England
Submitted on 2021-12-01 15:04:17

Introduction

1 Would you like your response to be confidential?

No

Blank free text box for answer:

2 What is your name?

Name:
Daniel Instone

3 What is your email address?

Email:
danielinstone@gmail.com

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 the one which is most applicable to you):

non-governmental organisation

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

Organisation:
London Forum of Amenity and Civic Societies

Proposals

Questions

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

Agree

Blank free text box for answer:

Sounds plausible; but we are not technical experts.

7 Do you agree or disagree with the proposal to introduce a ban on the supply of the following single-use items in England?

Agree with introducing bans - Plastic plates only:

Agree

Agree with introducing bans - Plastic plates, including plastic bowls:

Agree

Agree with introducing bans - Plastic plates, including plastic trays:

Agree

Agree with introducing bans - Plastic plates, including plastic bowls and plastic trays:

Agree

Agree with introducing bans - Plastic cutlery:

Agree

Agree with introducing bans - Plastic balloon sticks:

Agree

Agree with introducing bans - EPS food containers:

Agree

Agree with introducing bans - EPS beverage containers:

Agree

Blank free text box for answer:

For clear environmental benefits; and alternatives are available in each case

8 We propose that the ban should cover all 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 - Plastic plates:

All

Bio-based, compostable, biodegradable - Plastic cutlery:

All

Bio-based, compostable, biodegradable - Plastic balloon sticks:

All

Bio-based, compostable, biodegradable - EPS food containers:

All

Bio-based, compostable, biodegradable - EPS beverage containers:

All

Text box:

For environmental benefits; these apply also to bio based, compostable and biodegradable items as well

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

Exclude packaging - Exclude plates used as packaging:

Disagree

Exclude packaging - Exclude plates used as packaging, with the exception of those used in 'eat-in' settings:

Disagree

Blank free text box for answer:

We can see many environmental benefits in extending the ban to cover wider settings than eat-in ones. In addition, enforcement appears to be likely to be difficult if those providing plastic equipment can argue that there is a dimension to their provision which goes beyond eat-in settings, especially in relation to take-away food, which may be served in a similar way to food for eating in,

Impact on alternatives to banned items

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

No

Impact of alternatives to banned items

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

Risk of alternatives having environmental impacts - Plastic plates:

Don't know

Risk of alternatives having environmental impacts - Plastic cutlery:

Don't know

Risk of alternatives having environmental impacts - Plastic balloon sticks:

Don't know

Risk of alternatives having environmental impacts - EPS food containers:

Don't know

Risk of alternatives having environmental impacts - EPS beverage containers:

Don't know

Blank free text box for answer:

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.

Will any of the proposed item bans have a negative impact on certain people? - Plastic plates:

Don't know

Will any of the proposed item bans have a negative impact on certain people? - Plastic cutlery:

Don't know

Will any of the proposed item bans have a negative impact on certain people? - Plastic balloon sticks:

Don't know

Will any of the proposed item bans have a negative impact on certain people? - EPS food containers:

Don't know

Will any of the proposed item bans have a negative impact on certain people? - EPS beverage containers:

Don't know

Blank free text box for answer:

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

Should there be any exemptions from any ban? - Plastic plates:

No

Should there be any exemptions from any ban? - Plastic cutlery:

No

Should there be any exemptions from any ban? - Plastic balloon sticks:

No

Should there be any exemptions from any ban? - EPS food containers:

No

Should there be any exemptions from any ban? - EPS beverage containers:

No

Blank free text box for answer:

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.

Timing of the ban - Plastic plates:

Agree

Timing of the ban - Plastic cutlery:

Agree

Timing of the ban - Plastic balloon sticks:

Agree

Timing of the ban - EPS food containers:

Agree

Timing of the ban - EPS beverage containers:

Agree

Blank free text box for answer:

Impact assessment

16 Do you agree or disagree with our estimations that in 2018, 20 single-use plates, 75 pieces of single-use cutlery, 3 EPS boxes, 8 EPS cups, 6 EPS pots and 3 EPS trays and cones were consumed per person in England?

Do you agree or disagree with our estimations that in 2018, 20 single-use plastic plates, 75 pieces of single-use plastic cutlery, 3 EPS boxes, 8 EPS cups, 6 EPS pots and 3 EPS trays and cones were consumed per person in England? - Plastic plates:

Don't know

Do you agree or disagree with our estimations that in 2018, 20 single-use plastic plates, 75 pieces of single-use plastic cutlery, 3 EPS boxes, 8 EPS cups, 6 EPS pots and 3 EPS trays and cones were consumed per person in England? - Plastic cutlery:
Don't know

Do you agree or disagree with our estimations that in 2018, 20 single-use plastic plates, 75 pieces of single-use plastic cutlery, 3 EPS boxes, 8 EPS cups, 6 EPS pots and 3 EPS trays and cones were consumed per person in England? - Plastic balloon sticks:
Don't know

Do you agree or disagree with our estimations that in 2018, 20 single-use plastic plates, 75 pieces of single-use plastic cutlery, 3 EPS boxes, 8 EPS cups, 6 EPS pots and 3 EPS trays and cones were consumed per person in England? - EPS food containers:
Don't know

Do you agree or disagree with our estimations that in 2018, 20 single-use plastic plates, 75 pieces of single-use plastic cutlery, 3 EPS boxes, 8 EPS cups, 6 EPS pots and 3 EPS trays and cones were consumed per person in England? - EPS beverage containers:
Don't know

Blank free text box for answer:

17 Under our baseline scenario where there is no ban of single-use plastic plates and cutlery, we have forecast a 10% reduction per annum in the market share of the products to reflect a shift away from single-use plastics. Do you agree or disagree with this assumption?

Don't know

Blank free text box for answer:

18 Under our baseline scenario where there is no ban of EPS items, we have forecast a 5% reduction per annum in EPS market share to reflect a shift away from single-use plastics. Do you agree or disagree with this assumption?

Don't know

Blank free text box for answer:

19 Do you agree or disagree with our assumption that in 2018 50% of single-use plates and 90% of single-use cutlery in England were made from plastic?

Do you agree or disagree with our assumption that in 2018 50% of single-use plates and 90% of single-use cutlery in England were made from plastic? - Plates:
Don't know

Do you agree or disagree with our assumption that in 2018 50% of single-use plates and 90% of single-use cutlery in England were made from plastic? - Cutlery:
Don't know

Blank free text box for answer:

20 Do you agree or disagree with our assumption that in 2020, 80% of all food and beverage boxes, cups, pots and trays and cones in England were made from EPS?

Do you agree or disagree with our assumption that in 2020, 80% of all food and beverage boxes, cups, pots and trays and cones in England were made from EPS? - Box:
Don't know

Do you agree or disagree with our assumption that in 2020, 80% of all food and beverage boxes, cups, pots and trays and cones in England were made from EPS? - Cup:
Don't know

Do you agree or disagree with our assumption that in 2020, 80% of all food and beverage boxes, cups, pots and trays and cones in England were made from EPS? - Pot:
Don't know

Do you agree or disagree with our assumption that in 2020, 80% of all food and beverage boxes, cups, pots and trays and cones in England were made from EPS? - Tray:
Don't know

Do you agree or disagree with our assumption that in 2020, 80% of all food and beverage boxes, cups, pots and trays and cones in England were made from EPS? - Cone:
Don't know

Blank free text box for answer:

21 We have assumed that 10% of single-use plastic plates and cutlery are produced in the UK. Do you agree or disagree with this assumption?

We have assumed that 10% of single-use plastic plates and cutlery are produced in the UK - Plastic plates:
Don't know

We have assumed that 10% of single-use plastic plates and cutlery are produced in the UK - Plastic cutlery:
Don't know

Blank free text box for answer:

22 We have assumed that 95% of EPS food and beverage containers are produced in the UK. Do you agree or disagree with this assumption?

We have assumed that 95% of EPS food and beverage containers are produced in the UK. - EPS food containers:
Don't know

We have assumed that 95% of EPS food and beverage containers are produced in the UK. - EPS beverage containers:
Don't know

Blank free text box for answer:

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

Not Answered

24 If you manufacture single-use plates and cutlery domestically, how would you expect a ban on these items to affect your activity?

Not Answered

Blank free text box for answer:

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

26 If you manufacture EPS food and beverage containers domestically, how would you expect a ban on these items to affect your activity?

Not Answered

Blank free text box for answer:

27 Our estimations of the costs of single-use plastic plates and cutlery compared with alternatives are shown in the below table. Do you agree or disagree with our estimations?

Our estimations of the costs of single-use plastic plates and cutlery compared with alternatives are shown in the below table. - Plate (plastic):
Don't know

Our estimations of the costs of single-use plastic plates and cutlery compared with alternatives are shown in the below table. - Cutlery (plastic):
Don't know

Our estimations of the costs of single-use plastic plates and cutlery compared with alternatives are shown in the below table. - Plate (alternative):
Don't know

Our estimations of the costs of single-use plastic plates and cutlery compared with alternatives are shown in the below table. - Cutlery (alternative):
Don't know

Blank free text box for answer:

28 Our estimations of the costs of EPS compared with paper alternatives are shown in the below table. Do you agree or disagree with our estimations?

Estimations of the costs of EPS compared with paper alternatives - Box (EPS):
Don't know

Estimations of the costs of EPS compared with paper alternatives - Cup (EPS):
Don't know

Estimations of the costs of EPS compared with paper alternatives - Pot (EPS):
Don't know

Estimations of the costs of EPS compared with paper alternatives - Trays (EPS):
Don't know

Estimations of the costs of EPS compared with paper alternatives - Cones (EPS):
Don't know

Estimations of the costs of EPS compared with paper alternatives - Box (Paper):
Don't know

Estimations of the costs of EPS compared with paper alternatives - Cup (Paper):
Don't know

Estimations of the costs of EPS compared with paper alternatives - Pot (Paper):
Don't know

Estimations of the costs of EPS compared with paper alternatives - Trays (Paper):
Don't know

Estimations of the costs of EPS compared with paper alternatives - Cones (Paper):
Don't know

Blank free text box for answer:

29 Do you agree or disagree with our assumption (outlined in the accompanying impact assessments) that the additional costs from alternative materials will remain the same for the appraisal period?

11. Do you agree or disagree with our assumption (outlined in the accompanying impact assessments) that the additional costs from alternative materials will remain the same? - Plastic plates:
Don't know

11. Do you agree or disagree with our assumption (outlined in the accompanying impact assessments) that the additional costs from alternative materials will remain the same? - Plastic cutlery:
Don't know

11. Do you agree or disagree with our assumption (outlined in the accompanying impact assessments) that the additional costs from alternative materials will remain the same? - Plastic balloon sticks:
Don't know

11. Do you agree or disagree with our assumption (outlined in the accompanying impact assessments) that the additional costs from alternative materials will remain the same? - EPS food containers:
Don't know

11. Do you agree or disagree with our assumption (outlined in the accompanying impact assessments) that the additional costs from alternative materials will remain the same? - EPS beverage containers:
Don't know

Blank free text box for answer:

30 At end of life, we have assumed the below outcomes for plastic and wooden cutlery. Do you agree or disagree with these assumptions?

Don't know

Blank free text box for answer:

31 At end of life, we have assumed the below outcomes for plastic and paper plates. Do you agree or disagree with these assumptions?

Don't know

Blank free text box for answer:

32 At end of life, we have assumed the below outcomes for EPS and paper alternative products. Do you agree or disagree with these assumptions?

Don't know

Blank free text box for answer:

33 Do you agree or disagree with our assumption that litter disamenity values remain the same for the appraisal period?

Agree

Blank free text box for answer:

No reason to disagree with your assumptions

34 In determining the number of businesses that will be affected by a ban on EPS food and drink containers and single-use plastic plates and cutlery, we used Standard Industrialisation Codes (SICs) to identify categories of businesses likely to be affected. However, we have assumed that fast-food restaurants are more likely to use EPS food and beverage containers and single-use plastic plates and cutlery than restaurants

and therefore estimated the number of fast-food restaurants in England rather than using all the businesses in the “restaurants and mobile food service activities” SIC. Do you agree or disagree with this assumption?

SIC codes - Plastic plates:

Agree

SIC codes - Plastic cutlery:

Agree

SIC codes - EPS food containers:

Agree

SIC codes - EPS beverage containers:

Agree

Blank free text box for answer:

Your assumption sounds plausible

35 Do you agree or disagree with our estimation that 144,342 businesses will be affected by familiarisation costs for a ban on EPS containers?

Don't know

Blank free text box for answer:

36 Do you agree or disagree with our estimation that 90,650 businesses will be affected by familiarisation costs for a ban on single-use plastic plates and cutlery?

Don't know

Blank free text box for answer:

37 We have assumed that, on average, it would take 30 minutes of a full-time employee's time for businesses to familiarise themselves with the ban. Do you agree or disagree with this assumption?

Don't know

Blank free text box for answer:

38 In calculating additional fuel costs to businesses from transporting heavier paper items, we have assumed a mean distance travelled of 100km. Do you agree or disagree with this assumption?

Don't know

Blank free text box for answer:

39 For our central scenario for costs being passed from businesses to consumers, we have assumed that 60% of the costs businesses incur as a result of a greater unit price of alternative items will be passed to consumers. Do you agree or disagree with this assumption?

For our central scenario for costs being passed from businesses to consumers, we have assumed that 60% of the costs businesses incur as a result of a greater unit price of alternative items will be passed to consumers - Plastic plates and cutlery:

Don't know

For our central scenario for costs being passed from businesses to consumers, we have assumed that 60% of the costs businesses incur as a result of a greater unit price of alternative items will be passed to consumers - EPS containers:

Don't know

For our central scenario for costs being passed from businesses to consumers, we have assumed that 60% of the costs businesses incur as a result of a greater unit price of alternative items will be passed to consumers - Plastic balloon sticks:

Don't know

Blank free text box for answer:

40 Do you anticipate any additional costs and/or constraints to a) industry and b) consumers from this proposed ban on single-use plastic plates, plastic cutlery, plastic balloon sticks, EPS food containers, and EPS beverage containers?

Do you anticipate any additional costs and/or constraints - Plastic plates (industry):

Don't know

Do you anticipate any additional costs and/or constraints - Plastic cutlery (industry):

Don't know

Do you anticipate any additional costs and/or constraints - Plastic balloon sticks (industry):
Don't know

Do you anticipate any additional costs and/or constraints - EPS food containers (industry):
Don't know

Do you anticipate any additional costs and/or constraints - EPS beverage containers (industry):
Don't know

Do you anticipate any additional costs and/or constraints - Plastic plates (consumers):
Don't know

Do you anticipate any additional costs and/or constraints - Plastic cutlery (consumers):
Don't know

Do you anticipate any additional costs and/or constraints - Plastic balloon sticks (consumers):
Don't know

Do you anticipate any additional costs and/or constraints - EPS food containers (consumers):
Don't know

Do you anticipate any additional costs and/or constraints - EPS beverage containers (consumers):
Don't know

Blank free text box for answer:

Additional questions

41 Apart from a ban, are there any other approaches that Government should consider? Please provide any evidence in support of your recommended approach.

Blank free text box for answer:

We would encourage you to consider actively other kinds of plastic bans that might be plausible outside your current two consultations. For example, bans on certain kinds of packaging materials, such as lightweight plastic foam commonly used inside boxes being delivered and which are a major source of litter.

42 Is there anything else you would like to tell us relating to the proposed ban on the supply of single-use plastic plates, cutlery, balloon sticks and food and beverage containers made out of EPS?

Blank free text box for answer: