

Number: WG41757



Llywodraeth Cymru
Welsh Government

Welsh Government

Consultation – summary of responses

Reducing single use plastics

Proposals to ban nine single use plastic products in Wales

August 2022

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.
This document is also available in Welsh.

OGI © Crown Copyright Digital ISBN 978-1-80195-887-5



Contents

Introduction	4
How data is reviewed and presented in this document	4
Responses to the consultation	4
Campaigns, campaigners and group responses	5
Language of response	5
Responses to the full consultation document	6
Question 1: Do you support our proposal to ban each of the single use plastic items listed above? If not, please give reasons and where possible evidence to support this view.	6
Straws	7
Expanded/ Extruded Polystyrene food containers and cups	7
Plates and cutlery.....	7
Products made of oxo-degradable plastic	8
Question 2: Do you agree the potential environmental and social benefits of our proposals outweigh the potential impacts on people in Wales? Please give reasons and where possible evidence to support this view.	10
Question 4: Should oxo-degradable plastics be included on the list of items to be banned? Please provide evidence to support this view.	16
Question 5: Do you believe the COVID-19 pandemic has resulted in changes to the market that are currently not accounted for in our research? Please give reasons and where possible evidence to support this view.	19
Question 6: Do you agree with the exemptions we are proposing and how we make them as clear and practicable as possible to apply? Please give reasons and where possible evidence to support this view.	21
Question 7: Are there other exemptions we should consider in relation to all of the single use plastic items in our proposal? Please provide as much detail as you can.....	24
Question 8: Do you agree the proposed timescale for the implementation of the bans provides sufficient time for businesses of all types to adapt? Please give reasons and where possible evidence to support this view.	26
Question 9: Do you agree with the use of Civil Sanctions?	28
Question 10: Do you agree that Local Authorities should enforce the ban?	30
Question 11: Should wet wipes be included in future proposals for further bans or are there other measures which could be introduced to address them, for example Extended Producer Responsibility? Please give reasons and where possible evidence to support this view.....	32

Question 12: Are there any other items that should be included in any future policy proposals to tackle single use plastics? Please give reasons and where possible evidence to support this view.....	35
Question 13: What effects do you think there would be on the Welsh language? How could positive effects be increased, or negative effects be mitigated?	37
Question 14: Please also explain how you believe the proposed policy for banning the distribution and /or sale of the proposed single use plastic items could be formulated or changed so as to have positive effects, or increased positive effects, on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.....	38
Question 15: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.	39
Responses to the Easy Read Version of the SUP consultation	41
Question 1: Do you agree with our plan to reduce the amount of single use plastic in Wales? If no, could you tell us why?	41
Question 2: Can you think of any other single use plastic items we should include on the list we gave you at the beginning of this questionnaire?	42
Question 3: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.	43
Government response – next steps.....	44
ANNEX 1	46
Senedd Leuencid Cymru / Welsh Youth Parliament - Litter consultation workshop	46
Wales Environment Platform Workshop Event	48
Community Event for Reducing Single Use Plastic Consultation – Pontypridd	49

Introduction

We would like to thank everyone who responded to our consultation. It is not the intent, nor would it be possible, to reflect every comment received in this report. The purpose is to give an overview of the responses, an indication of the kinds of issues and concerns raised in relation to our proposals.

How data is reviewed and presented in this document

This Summary of Response document covers both the full and easy read versions of the consultation document. As both documents were distinct, they have been summarised and handled in this response as separate elements. However, views and comments expressed in both have been taken into account.

In addition, we held a number of online meetings with different groups, including with representatives of the Youth Parliament, large businesses operating in Wales, a number of local community groups and an online workshop with academics and other experts hosted by Environment Platform Wales. A summary of the outcome of these events is included in the annex section of this document.

Responses to the consultation

There were a total of 3,581 responses to the consultation made up from the following categories:

Full consultation, including partial responses (not all questions were answered)	3,429
Easy Read consultation, including partial responses (not all questions were answered)	152
Total number of responses	3,581

There were a number of instances where the same person submitted more than one response. For the purposes of the statistics in this report, where we identified multiple responses, we only counted one of them, taking the data from the most recently submitted, fully completed response. Where only partial responses were recorded, data from the most complete form has been used. Where respondents only answered some questions, this is reflected in the tables and charts. To provide a good balance between accuracy and readability, percentages in the tables have been rounded. Therefore, they may not add up to 100.

Protected Characteristic Individuals and Groups

We received a number of responses from disabled people and their representatives as well as from representatives for older people, children and young people.

Campaigns, campaigners and group responses

We received responses from a number of organised campaigns, which included environmental Non-Government Organisations (NGOs), those representing manufacturers/producers, a number of staff and customers of Dŵr Cymru Welsh Water and a combined response from members of the Chartered Institution of Waste Management (CIWM). We also received responses by campaigners for specific issues, such as plastic-free periods, who kindly shared the results of their own surveys with us.

Some respondents, particularly those representing manufacturers or those providing specialist or expert input, submitted detailed information covering the themes in the consultation in essay format. The Welsh Government is very grateful to have received these detailed responses.

Language of response

The full and easy-read versions of the consultation were available in English and Welsh with individuals having a choice to respond in the language of their preference. One response was received in both Welsh and English. Responses were split between the two languages as follows:

English	3,556
Welsh	25

Responses to the full consultation document

Question 1: Do you support our proposal to ban each of the single use plastic items listed above? If not, please give reasons and where possible evidence to support this view.

Q1				
	Yes	No	No answer	Response total
Cotton buds	3,010 88%	95 3%	324 9%	3,429
Plates	2,995 87%	103 3%	331 10%	3,429
Cutlery	2,993 87%	102 3%	334 10%	3,429
Drinks stirrers	3,062 89%	38 1%	329 10%	3,429
Straws	2,983 87%	113 3%	333 10%	3,429
Sticks for balloons	3,063 89%	30 1%	336 10%	3,429
Beverage cups made of EPS	3,043 89%	44 1%	342 10%	3,429
Food containers made of EPS	3,039 89%	58 2%	332 10%	3,429
Products made of oxo-degradable plastic	2,992 87%	80 2%	357 10%	3,429

The calculations above are a percentage of the total responses to the full consultation (3,429)

The table above shows an overwhelming level of support for a ban on all of the single use plastic items listed in the consultation. Where respondents gave a reason, agreement was based primarily on concerns over the environmental impacts of the items once littered due to the persistence of plastic in the environment. The difficulty of recycling the items and the availability of affordable and sustainable alternatives was also cited. A number of respondents felt the bans should already be in place and were disappointed action had not already been taken.

A small number of respondents raised concerns over the potential negative impacts of a ban. A number of respondents, including those in the manufacturing sectors, academia, environmental NGOs and the government sector, highlighted the need to support such action with life cycle analysis (LCA) studies. This was to ensure any alternatives did not have a greater impact on the environment than plastic. Some also pointed to plastic being more lightweight and cheaper than commonly available

alternatives, which meant it was comparable with some alternative materials. Others suggested publishing guidance to help sellers identify suitable alternatives.

Other respondents were happy overall with the suggested bans, however they raised concerns in relation to a particular item or suggested they should be made available via another mechanism. A brief overview of these concerns are provided below and some are discussed in more detail under the relevant question.

Straws

For straws, concerns were focussed primarily on the unsuitability and/or cost of alternative materials or reusable straws. For example, rigid straws made of metal or glass posed a potential injury risk for some disabled people and paper straws were inadequate for hot drinks. Whilst some respondents were opposed to any form of ban or restriction on single use plastic straws, others referred to the need for exemptions. The inclusion in English regulations of the requirement for straws to be available only on request at a restaurant/café/pub was cited as example of this approach. Others suggested straws could be made available via prescription, or only sold in pharmacies. One respondent, a manufacturer of plant based compostable foodservice products, requested for straws made from compostable material to be exempted from the regulations.

A number of respondents highlighted the exemption of medical straws included in the European Union's Single Use Plastics Directive and asked for a similar provision to be made in Wales. A small number of respondents raised concerns over the inclusion of carton straws in the proposals and the timescales needed for manufacturers to develop alternative solutions, although others suggested solutions were currently being developed and implemented. Particular reference was made to the difficulties likely to arise with the provision of milk cartons to schools in Wales.

Expanded/Extruded Polystyrene food containers and cups

Respondents from the manufacturing sector highlighted a recent increase in demand for single use plastic products in healthcare settings as the result of the COVID-19 pandemic. Several respondents made specific reference to the increased usage of food and drink containers made of expanded polystyrene (EPS) in the NHS and the potential additional costs alternative materials would incur for this sector if these items were banned.

Concerns were also raised on whether alternative materials could pose a risk to food or consumer safety and there was a suggestion further research was needed in this area. This included consideration of the thermal and insulation properties of EPS (which can prevent injury from hot liquid) and its relative cheap cost when compared with alternative materials. The latter was raised in relation to the potential financial impact on smaller, independent food businesses or their customers.

Plates and cutlery

As with food and drinks containers, the increased use of these types of single use plastic items during the COVID-19 pandemic was provided as a reason not to bring

in a ban on these items. Disability groups highlighted potential negative impacts on individuals who were currently reliant on these types of items.

Products made of oxo-degradable plastic

In general, there was a high level of support for including products made of this material due to the understanding it hastened the creation of micro-plastics. However, a minority of respondents were opposed to their inclusion. Of these, many either did not provide a reason or indicated they felt there was not enough evidence of their harm in Wales.

A number of respondents suggested greater clarification was required on the definitions currently being used to label certain products, for example, oxo-degradable, compostable and oxo-biodegradable, to help businesses and consumers make informed choices in this area. For consistency, one respondent recommended following the definitions used by the European Union's Single Use Plastic Directive. These points are discussed further under Question 4 which specifically asked about oxo-degradable plastics.

A number of respondents used this question to suggest additional items which could be included in the bans. These have been considered under responses to Question 12.

Indicative quotes

*“Straws is tricky. Disabled and very ill people need straws and paper ones don't work in such circumstances whilst metal ones are hazardous and multiple use plastic ones are very difficult to clean properly. During my mum's recent and sadly terminal illness, we struggled to find straws for her to be able to drink.” **Anonymous***

*“No mention of plastic drinks bottles, probably the biggest source of plastic in the environment.” **Greg Nuttgens***

*“I believe all of the above objects can either be made reusable or made of a different material than plastic. Therefore, I don't see any reason for them to exist as single use plastic items. I believe the slight increase in cost of alternative materials is worth it for the benefit of having reduced single use plastic in existence. I also believe that the increased demand for these alternatives following a single use plastic ban would result in increased innovation in production, and reduced prices through economies of scale.” **Anonymous (Non-Governmental Organisation)***

“Yes – we need to consider ‘environmental costs’ as ‘what would the cost be of attempting to remove this litter from our pipes, rivers and seas?’ And what has the cost already been so far? These costs have been passed on to the public as statutory bodies need to deal with clean up and absorb those costs through public funds. Much of our litter is picked up by volunteers – organised by NGOs like Keep Wales Tidy and Marine Conservation Society – or by council workers or by statutory bodies like Dŵr Cymru. All of that energy and time could have been put towards other improvements in our environment and is instead spent on cleaning up. Businesses have been benefitting from the good nature of volunteers and not paying

the real environmental price of their products.” **Anonymous (Environmental Non-Governmental Organisation)**

Question 2: Do you agree the potential environmental and social benefits of our proposals outweigh the potential impacts on people in Wales? Please give reasons and where possible evidence to support this view.

Q2				
	Y	N	Answered neither yes nor no	No answer
Numbers	2,757	59	76	537
Percentage	80%	2%	2%	16%
<i>The calculations above are a percentage of the total responses to the full consultation (3,429)</i>				

There was clear agreement with the assumptions made in our Preliminary Impact Assessment that the regulations would help limit the environmental impact of these products in Wales and benefit society as a whole. A number of respondents suggested any inconvenience resulting from the bans would be short lived and people would adapt quickly. The introduction of the single use carrier bag charge was frequently cited as an example of a policy that led to long-term environmental benefits despite short-term disruption for retailers and the public. Others felt the availability of alternatives meant any inconvenience would be minor and the regulations were necessary for the good of the planet.

Some respondents used this question to highlight a need for targeted behaviour change measures to help reduce littering, noting this would still occur regardless of the material. Others suggested there was a need to improve recycling provision in public areas, particularly in tourist areas, to help increase the “capture” of on-the-go packaging and products.

A small number of responses questioned whether Wales had a big enough share of the consumer market to shift global consumption and manufacture of these products. Some also expressed concern Welsh consumers would ultimately pay more if manufacturers and retailers passed on any costs by increasing prices of the goods they sold. However, others felt the Welsh Government should be leading the way and Welsh businesses making reusable/ more sustainable products could benefit if other countries then followed with similar bans. This in turn would create jobs for people in Wales.

A number of responses from the manufacturing sector raised concerns over the potential environmental impacts of alternative materials if the appropriate life cycle analysis (LCA) studies had not been undertaken. Reference was made to the difficulties in recycling paper cups lined with plastic (cited as a potential replacement of EPS cups) and alternative materials being heavier or more energy intensive than plastic (which can result in a higher carbon footprint). It was felt full Environmental Impact Assessments (EIA) and LCAs were needed before alternatives could be recommended for wider production.

Other respondents also urged caution around the use of alternative materials and the risk of unforeseen environmental impacts elsewhere in the supply chain. Some felt this particularly relevant given the Welsh Government’s declaration of a Climate

Emergency. A complete shift away from single use to reusable packaging and products, as part of a wider move towards a circular economy in Wales, was considered key to addressing any potential environmental impacts.

Whilst Question 5 was included in the consultation to help understand the potential impacts of the COVID-19 pandemic, several respondents chose to refer to this issue under this question. These were mainly in relation to concerns of the potential economic impacts on the manufacturing, retail and hospitality sectors if alternative products were more costly during an already challenging time. One respondent noted the uncertainties in relation to future EU trade negotiations at the time of the consultation had not been factored into the initial Impact Assessment work.

Indicative quotes

“Many of these things are not difficult to do. Small changes can have a big impact. It’s a tiny investment of time and effort when you consider what is at stake. We would therefore support a ban in the long term, subject to adequate transitional arrangements/a temporary exemption until alternative products can be developed by manufacturers. If there is a viable alternative to plastic straws, providers will use them, but any additional cost will need to be considered as part of the funding of the sector.” **Anonymous respondent from the care sector**

“Any proposed legislation and regulation must ensure we avoid any unintended consequences and focus on all single use disposable items not just plastic ones. It would be sensible for the Welsh Government to actively incentivise the use of more durable, re-usable products (and packaging) or new formats for which a mainstream recycling solution already exists is simple to implement any necessary adaptations.” **SUEZ Recycling and Recovery UK Ltd**

“If businesses took greater responsibility for the design of products to minimise the environmental impact, maximise recycling and encourage reuse there would be a greater balance in the responsibility for managing the plastic waste between manufacturers, retailers and local authorities. This could result in significant savings for local authorities which could then be directed towards other essential services. With a shift away from the use of some single use plastic the impact on local amenity of littered items is unlikely to change as litter will continue to be dropped and the costs to local authorities of clearing the littered items will remain unchanged. The longer-term impact on the environment of these items which remain in the environment for a longer period could however be less, depending on the composition of the alternative product.” **Local Authority Recycling Advisory Committee (LARAC)**

“We support this initiative to reduce litter and waste generation and feels it aligns closely with the Wellbeing of Future Generations Act supporting a sustainable, healthier Wales and a global Wales. Furthermore, there is considerable evidence that plastic litter entering the aquatic and marine environment will break down and eventually produce micro and nano plastic fragments, with the potential to adversely impact aquatic and marine organisms and enter food chains with potential for human consumption. Much more work is required to evaluate the effects of micro and nano plastics, particularly around their potential impact upon human health. Initiatives such

as described in this consultation can help to reduce new plastics entering the environment and raise awareness of the issues around such wastes and litter. It is felt however that this should be part of a wider strategy to evaluate existing risks and look at ways of reducing other sources of plastic entering the environment.”

Anonymous public sector body

Question 3: Do you agree with our assessment of the potential benefits and impacts our proposals will have on businesses, including manufacturing, in Wales? Please give reasons and where possible evidence to support this view.

Q3				
	Y	N	Answered neither yes nor no	No answer
Numbers	2,580	72	54	723
Percentage	75%	2%	2%	21%
<i>The calculations above are a percentage of the total responses to the full consultation (3,429)</i>				

Whilst there was a high level of support for the economic benefits element of our Preliminary Impact Assessment, almost 21% of respondents (723) either did not respond to the question or suggested they were not in a position to comment either way.

Of those who did respond positively, most believed the regulations offered Welsh businesses a potential to invest and manufacture alternatives to the products being banned. Some felt this could create local employment opportunities and help support wider economic growth in Wales.

A number of respondents, particularly those from the plastic and packaging manufacturing sectors, cautioned developing new and innovative solutions was often costly, especially if significant investment was required to fund research and make changes to infrastructure. The production of drink cartons with attached straws was provided as an example of generating significant costs for businesses if alternative materials were required. Other respondents suggested such investments would require financial support from Government or additional regulatory action to prevent cheaper products being imported into Wales.

Concerns were raised by some respondents about the possible environmental costs of any shift towards the manufacturing of other single use items made of different materials, for example paper or biodegradable plastic. This was due to the potential for these materials to have equal, or in some cases higher, energy costs to produce, transport and recycle. It was felt this approach was inconsistent with the Welsh Government's aim of establishing a circular economy and support should instead be focussed on those companies developing reusable alternatives.

A small number of respondents highlighted potential limitations in the data presented in the Preliminary Impact Assessment, in particular consideration of wider impacts if existing companies were unable to adapt their production lines. Others commented on the need for further detailed assessment of specific items, for example straws. One respondent questioned whether consideration had been given to impacts on other aspects of the supply chain, including wholesalers and importers.

Whilst a specific question was included in the consultation relating to the potential wider economic impacts of the COVID-19 pandemic (Question 5), several

respondents highlighted the need to consider this when deciding when to introduce the regulations.

Although responses from businesses who had already made changes to how they operate in Wales were limited, one respondent (a local pub owner) suggested some additional costs had been incurred from changing from plastic to paper straws. However, these had been minimal and had not negatively impacted their business.

A common theme running throughout the comments was the belief Welsh businesses can adapt and innovate to the regulations provided they were clear, consistent and published in a reasonable timescale. The introduction of the single use carrier bag charge was again cited as an example to support this view.

Indicative quotes

*“I have bought takeaway food in 'papier-mâché' and cardboard boxes without plastic linings why can't every take away food place use them. We have been told we are particularly good in wales at recycling, recycled rubbish should be made into other useful thing by local business in Wales e.g. why can't coffee grounds from coffee shops etc... be collected on mass and made into green fuel coffee logs for wood burners.” **Anonymous***

*“Wales could become a leader in Green Economic recovery if businesses and manufacturing embraced and adapted to these changes.” **Anonymous***

*“We have many innovative businesses in Wales, the move to find new sustainable products and end uses could prove lucrative for the manufacturing sector.” **Laura Palmer***

*“Getting rid of the biggest problem means that the producers have to look at alternative solutions. Investment will have to be made into R&D and a commitment to follow through on more environmentally sustainable solutions. Keeping the status-quo is not an option as the environment will continue to struggle and the wildlife will suffer.” **Anonymous***

*“Yes -There will be a massive new market for alternatives to single use plastic, which will encourage innovation and entrepreneurial action with Wales. I believe this should be coincided with support to encourage new startups in the field, as well as aiding current single use plastics producers to switch to a more sustainable business model.” **Phil Lansdown***

“As identified in the consultation, there may be some minor costs (both to manufacturers/consumers and in terms of life cycle impacts), but these will be significantly outweighed by the social and environmental benefits. There remain many unanswered questions relating to the potential for unintended consequences (e.g. the impact on individual behaviour) when considered in terms of life cycle assessment (e.g. as has happened in relation to consumers switching from single use plastic bags to treating 'bags for life' as being disposable), but even in totality the life cycle impacts of the products proposed to be banned are relatively minor. Consequently, as long as it is accepted that these measures are being taken

because of issues such as littering and plastic pollution, potential negative LCA outcomes are not a great concern. Implementing these measures in Wales will send a clear and unambiguous signal to other administrations, and in doing so will drive innovation in the material design and manufacture of these items.” **Bio-feedstock and Bio-based Economy Researchers, Institute of Biological, Environmental and Rural Sciences, Aberystwyth University**

Question 4: Should oxo-degradable plastics be included on the list of items to be banned? Please provide evidence to support this view.

Q4				
	Y	N	Answered neither yes nor no	No answer
Numbers	2,390	147	42	850
Percentage	70%	4%	1%	25%
<i>The calculations above are a percentage of the total responses to the full consultation (3,429)</i>				

In total, 850 respondents provided no answer to this question. However, a number of those responses commented they did not know enough about the type of plastic being referred to and, therefore, did not feel able to offer an opinion.

Of those who did respond, the majority highlighted concerns of using plastics which were made to break into smaller pieces (micro-plastics) and the potential impact they will have on aquatic life and other ecosystems for generations to come. Further concerns were raised about the risk of micro-plastics entering the food chain and the potential implications for human health, the effect of which is not fully understood.

Respondents from the environmental NGO sector and academia supported bans on the basis they believed there was a lack of certainty as to how such materials behaved in the environment. Others referenced research papers which evidenced the additional harm, over and above that of plastic, the additives used in oxo-degradable products caused. A number of respondents noted the timescales required to breakdown such products would not address the visual aspects of littering and could indeed encourage more of this type of behaviour if people considered such products to be “less harmful” to the environment.

A number of respondents used this question to highlight the complex and confusing terminology surrounding different types of plastics. They felt this led to confusion among consumers and retailers, which some suggested was deliberately cultivated, about the source, origin and environmental impact of ‘alternative’ plastics. They suggested the unintended consequence of this confusion is that purchasing decisions would be made under false assumptions, leading to potential environmental harm.

Examples provided of this included the use of the term ‘bio-plastic’ which is used to describe either materials derived from plant-based materials, such as corn-starch, or plastic which is ‘biodegradable’ under specific conditions. This ‘degradability’ can apply to traditional or plant-derived plastics. One respondent, an environmental charity, referred to academic studies and research which had found materials certified to internationally recognised ‘degradability’ standards had failed to meet that standard under the various environmental conditions tested.

Of the respondents who opposed a ban, a number wished to see support given to other products to allow market forces to change usage and others were uncertain of

the impact of these products. A small number viewed oxo-degradable plastics as a potential stepping-stone to an eventual wider ban on all plastics.

One submission suggested there was a need to differentiate between 'oxo-degradable' and 'oxo-biodegradable' plastics. They stated no plastic is sold as 'oxo-degradable', a term which describes the process by which all plastic breaks down (see quote below).

Indicative quotes

"The difference between oxo-biodegradable and compostable is really subtle. While compostable bags decompose completely, the oxo-biodegradable bags leave small particles behind as they decompose, and those particles can be problematic (often made from petroleum products). Ultimately, oxo-degradable plastics are worse than plastics themselves and in the long term will cause more harm to our environment than good. The small particles will be prevalent in our food chain at a much quicker rate and at a higher percentage than they already do, as they break down faster but never completely decompose." **Anonymous**

"Currently the marketing world is rife with green-washing and mixed messaging surrounding the compostable or bio-degradable ability of bio-plastics. This needs to be stopped at the source by setting clearly defined parameters around how these products should be classified and advertised and communicating this to consumers and retailers effectively to ensure appropriate disposal. As oxo-plastics fit neither of these descriptions (compostable or bio-degradable, in line with biological processes), then they should be considered equally as harmful as single-use petrochemical plastics." **Charlotte Rhodes**

"Oxo-degradation" is defined by CEN (the European Standards authority) in TR15351 as "degradation identified as resulting from oxidative cleavage of macromolecules." This describes ordinary plastics, which degrade by oxidation under the influence of light and heat in the open environment and create microplastics, but do not become biodegradable except over a very long period of time. Oxo-degradable (as distinct from oxo-biodegradable) plastic has been banned for good reason in Saudi Arabia, the UAE, and elsewhere for a wide range of everyday plastic products, and it should also be banned in Wales. Nobody makes plastic and sells it as "oxo-degradable" but this terminology is used by the Ellen MacArthur Foundation, the EU Commission, and others who are reluctant to acknowledge the difference between oxo-degradable and oxo-biodegradable plastic. "Oxo-biodegradation" is defined by CEN as "degradation resulting from oxidative and cell-mediated phenomena, either simultaneously or successively". This means that the plastic degrades by oxidation until its molecular weight is low enough to be accessible to bacteria and fungi, who then recycle it back into nature by cell-mediated phenomena. It does not leave microplastics. Oxo-biodegradable plastics are tested according to ASTM D6954; BS 8472, PAS 9017 and similar Standards, which prescribe tests for biodegradation as well as abiotic degradation. They also include tests to ensure that there is no toxicity, and no prohibited metals or gel content above the prescribed level. Plastic should not therefore be banned if it is proved to be oxo-biodegradable by tests performed according to these Standards." **Oxo-biodegradable Plastics Association**

“The public do not understand the differences between plastics and the terms biodegradable, degradable and compostable. Industry plays on this naivety to ‘sell products’ which are perceived to be environmentally friendly when they are not. The evidence for this is on our high streets. Small businesses proudly use the oxo-degradable plastic bags and tell customers that they are bio-degradable. Industry does nothing to dispel this myth. There is no clear instruction on how to dispose of such items. Instead ‘degradable’ is used purposefully because the general public misconceive this to be an eco-friendly process.” **Anonymous reducing plastic campaign group**

Question 5: Do you believe the COVID-19 pandemic has resulted in changes to the market that are currently not accounted for in our research? Please give reasons and where possible evidence to support this view.

Q5				
	Y	N	Answered neither yes nor no	No answer
Numbers	1,478	971	39	941
Percentage	43%	28%	1%	27%
<i>The calculations above are a percentage of the total responses to the full consultation (3,429)</i>				

A significant number of responses highlighted the increased use of single use plastic during the COVID-19 pandemic and the potential environmental implications of this. Of particular concern was the increased littering of single use face coverings (masks and visors) and takeaway food containers, the latter being the result of businesses having to adapt to various operational restrictions due to the pandemic. Other indirect impacts noted included the increase in packaging from online deliveries (one Local Authority noted a marked increase in kerbside recycling) and an increased use of single use plastic carrier bags by supermarkets for their home delivery services.

Whilst some respondents suggested these changes were likely to be short lived, others expressed concern over the longer-term impacts of these changes and questioned whether the pandemic had reversed the recent shift towards reusable items. Other respondents noted there was a risk more “environmentally friendly” products could potentially be overlooked if the economic recovery was focussed purely on supporting companies who produced existing, plastic single use items. A number of respondents suggested better guidance was needed to help reassure businesses that reusable items could be used if the appropriate hygiene measures were followed.

Those representing businesses and the manufacturing sector suggested the COVID-19 pandemic has highlighted the importance of single use plastic products, citing an increased demand of single use cutlery, EPS food containers and cups in the NHS, social care settings and schools. It was considered such items were vital to help reduce the transmission of the virus as it reduced the handling of reusable items between users. However, other respondents disputed such claims and often referred to published evidence, [e.g. ‘How long will Coronavirus Survive on Surfaces’](#), which indicated the virus actually survives longer on plastic surfaces and good hygiene practice effectively reduced any risk of transmission.

Responses from those in the plastic and packaging manufacturing sector also expressed concerns over the timing of any ban, noting if the pandemic was still ongoing at the time of its introduction, there was likely to be high levels of wastage due to unused stock.

We received several responses to this particular question from, or on behalf of children and young people. Some of these responses focused on the positive environmental impacts during the first national lockdown, noting a reduction in litter as people remained at home. Other respondents shared similar sentiments, noting

the pandemic had made them reassess their shopping habits and had raised their environmental awareness of the damage caused by overconsumption.

Whilst no specific comments were made in relation to our Preliminary Impact Assessment, some respondents suggested amendments may be required to reflect the recent increase in usage of some of the products included in our regulations.

Indicative quotes

“I think that the positive environmental impacts that were evident during lockdowns in the UK and around the globe clearly shown the adverse effects we have on the planet. (cleaner air, disappearance of smogs etc.) It has made us reflect on the damage we do to the planet and strengthened the resolve to take action. It is an ideal opportunity for everyone, especially governments, to put pressure on manufacturing to come up with more sustainable products and a drive towards the circular economy.” **Anonymous**

“The use of single-use plastic masks and plastic antibacterial wipes needs to be considered. This has of course skyrocketed due to the pandemic, and yet the terrible effects on nature remain. A push needs to be made to encourage people to use reusable masks where possible (or to make these available to poorer people), and to ban plastic wipes. Biodegradable wipes and suitable alternatives should be made available.” **Dr Siriol McAvoy**

“It’s probably too early to know fully. They may be a perception that packaged items are safer as contents not open to manhandling. Lots of people are losing jobs - especially women- and may struggle with price increases if manufacturers seek to pass on the costs of turning to biodegradable products.” **Anonymous**

“Covid-19 presented an unprecedented demand for products which had been put on the back shelves awaiting legislation to ban. The demand for plastic straws for nursing homes, medical environments etc went through the roof, as has individually wrapped plastic cutlery packs. I agree that moving forward, these products need to go but at this stage in the pandemic, I believe more time needs to be given before the hopefully inevitable change.” **Anonymous (Manufacturing sector)**

“Yes. The global pandemic has greatly brought the importance of hygiene and safety into sharp focus with an increased demand for disposable packaging and items considered by many of the public, retailers and others to reduce the risk of disease transmission. Many retailers believe reusable items put their serving teams at risk as unlike single use packaging there are no regulations governing their handling and use. The demand for EPS packaging, plastic plates and wrapped plastic cutlery has greatly increased. In addition to Covid impacts the legal requirements surrounding food safety should also be assessed.” **Anonymous (Manufacturing sector)**

Question 6: Do you agree with the exemptions we are proposing and how we make them as clear and practicable as possible to apply? Please give reasons and where possible evidence to support this view.

Q6				
	Y	N	Answered neither yes nor no	No answer
Numbers	1,927	308	42	1,152
Percentage	56%	9%	1%	34%
<i>The calculations above are a percentage of the total responses to the full consultation (3,429)</i>				

There was general support for the inclusion of exemptions. Respondents agreed that for most individuals, a ban on SUP straws would result in their decision to use alternative straws such as metal, paper, glass, silicone, acrylic, pasta/rice, bamboo, and other biodegradable materials. However, a number of respondents were concerned that, for some of the population, especially older or disabled people, alternative SUP drinking straws were not suitable for a number of reasons:

- Some older and disabled groups rely on flexible plastic straws to eat and drink safely or independently, in a variety of settings.
- Some types of alternative items, such as glass or metal, could cause injury for some individuals who have conditions that cause tremors and spasms.
- Single use alternative straws do not provide the same flexibility/functionality as plastic straws and therefore are unlikely to be a suitable alternative item for people who are bedbound, those that cannot re-position themselves to drink from cups or tilt their head back, those with dexterity problems or painful conditions.
- Purchasing straws made from other materials could impose additional costs to the user.
- Items sold that are suitable for re-use would require them to be cleaned/sterilised between each use creating inconvenience for the user.

Some respondents opposed this approach. This opposition was based primarily on the view that suitable alternatives were either already available or would likely become available once the regulations came into force. Some respondents suggested the Welsh Government and businesses should ensure this by focussing their attention on providing environmentally friendly alternatives for people who need these products. Other respondents felt a strict ban was needed so as to prevent any further environmental damage from these items.

Others expressed concern some manufacturers and businesses would view any exemption as a potential “loophole” in the law and continue to produce the items thus undermining the aim of reducing their usage. To address this, some respondents suggested if exemptions were introduced, these should be time limited and supported by stringent enforcement action to ensure full compliance.

Of those respondents who were in favour of exemptions, most preferred for these to be kept to a minimum, with health and social care settings considered to be the most appropriate focus. However, some respondents expressed concern over medicalising the listed items and the potential barriers this could present to disabled people. It was also questioned whether this approach was compatible with the [Social Model of Disability](#), which the Senedd and the Welsh Government have adopted. A number of respondents suggested any supporting guidance and communications should include sufficient explanation around why some individuals needed access to any exempted items, so as to avoid becoming stigmatised or subject to harassment for using them. One respondent sought clarification as to whether businesses would still need to make reasonable adjustments under the Equality Act 2010 by retaining a small supply of plastic drinking straws in case a disabled customer requests them.

A number of responses from Local Authorities highlighted the need for clear definitions in the regulations and in any supporting guidance to ensure effective enforcement. Some respondents referred to the perceived ambiguity of the terminology used in the consultation document. Clarity was also sought on how the proposals and exemptions would apply to online shopping and goods imported. Another respondent suggested any guidance should also be made available in other languages besides English and Welsh given the multi-national nature of the hospitality and catering sectors. Consistency with other UK administrations was also considered important so as to ensure customers understood what items were available and how they could be accessed if needed.

A number of respondents provided specific comments under this question. This included the need to consider the impact on people with severe food allergies. Another expressed the need for further consultation with the health and social services sector to ensure any alternatives were safe and hygienic to use in those settings.

Indicative quotes

*“I don't agree with the exemptions, there are already many products made of alternatives materials and straws are included in this list. For example, your research says that straws are needed in the hospital and care homes, there are already biodegradable straws available commercially, why hospitals and care homes are not buying them? Because at the moment plastic is used everywhere and therefore is cheap. The laws of economics will work for the biodegradable products in the same way, as soon as the plastic is removed and the alternative products are allowed to flood the market the price of production and distribution will decrease.” **Anonymous***

“Where no suitable alternative exists and the need is clear, we support the exemptions listed. For example, paper straws may not be practicable to use to assist disabled or sick people to eat and drink. Presumably these straws would be provided via the NHS or social care. Metal straws or similar are currently available.”
Llandrindod Wells Town Council

“We would welcome clarity on the exemptions for attached plastic straws – i.e. those used on cartons and pouches – as these may be used in different settings to standard ‘loose’ plastic straws. We believe there are likely to be grounds for to

exempt plastic straws for medical enabling and other specialist uses from any sales bans or restrictions. Consumers who would require a straw for medical or other specialist purpose should have easy access to these in all catering establishments. We also request clarity on exemptions for the use of attached plastic straws by children in schools and nurseries. How such exemptions are operated in practice would be best informed by the views and experience of the service sector, which would be most informed to provide a response.” **British Soft Drinks Association**

“As set out in the response to question one in line with recent legislation for England we support an exemption of the ban for those with medical needs, however, in order not to stigmatise those with disabilities and in order not to leave it to hospitality serving staff to make decisions on whether a customer is ‘deserving’ of a plastic straw, they should be made available to anyone on request. This would be on the condition straws are stored behind the counter not in public view no visual reference to their availability on public display. Guidance notes in English, Welsh and multiple languages to reflect the multi-national nature of the hospitality sector should be published. The latter because English language skills vary among operators within the various cuisines.” **Anonymous**

“Any exemptions for bans are problematic as it doesn’t not promote a clear message. However, we understand the concerns that some members of the disabled community have with the proposed ban on plastic straws and recognise the reliance that some people with mobility issues have on the use of these items. Whilst supporting the exemption, we would also not want this to be used as a ‘loophole’ for manufacturers and retailers. We therefore propose that the Welsh Government adopt stringent and clear guidance for these exemptions and would recommend that these only be applicable to hospitals, registered care homes and registered care agencies.” **Wales Environment Link**

Question 7: Are there other exemptions we should consider in relation to all of the single use plastic items in our proposal? Please provide as much detail as you can.

Q7				
	Yes	No	No answer	Response total
Cotton buds	426 12%	1,599 47%	1,404 41%	3,429
Plates	435 13%	1,585 46%	1,409 41%	3,429
Cutlery	422 12%	1,590 46%	1,417 41%	3,429
Drinks stirrers	393 11%	1,617 47%	1,419 41%	3,429
Straws	472 14%	1,546 45%	1,411 41%	3,429
Sticks for balloons	390 11%	1,616 47%	1,423 41%	3,429
Beverage cups made of EPS	397 12%	1,614 47%	1,418 41%	3,429
Food containers made of EPS	407 12%	1,603 47%	1,419 41%	3,429
Products made of oxo-degradable plastic	431 13%	1,563 46%	1,435 42%	3,429
<i>The calculations above are a percentage of the total responses to the full consultation (3,429)</i>				

A number of responses provided under this question covered similar ground to those provided under Question 6. For instance, respondents were either against exemptions altogether or supported them for health and social care purposes.

Very few respondents suggested exemptions beyond those discussed for single use plastic straws in Question 6. However, some disability groups suggested exemptions should be provided for the majority of items listed in our proposals given the potential implications this would have on day-to-day activities.

The additional suggestions put forward focussed predominantly on EPS food containers as well as beverage cups and cotton buds. For the former, support for exemptions of these items came mainly from the manufacturing and food-packaging sector where it was suggested a minimum two-year moratorium should be provided to allow small businesses (for example the independent fish and chip sector) to adjust and reduce any potential economic impact during a difficult period. This sector also provided an example of a Welsh specialist ice-cream producer, which could be

impacted by our proposals. Another suggested an exemption for EPS boxes and cups used to feed homeless people.

Concern was raised by one company about the difficulty some businesses may have in allowing staff to bring in reusable drinks' containers (due to lack of storage facilities) or where dependent on single use cups (for example, in healthcare settings). It was suggested these cups were unlikely to be littered and, therefore, should be subject to exemption.

Other respondents requested exemptions for specific plastic materials which could be composted, for example, bio-based and compostable polymers. Reference was made to other European countries and their proposals under the EU's Single Use Plastics Directive. For example, it was noted the Italian Government were not intending to ban compostable plastic materials and had mandated their use in certain situations, such as for events, where recycling by a specific collection method could be assured.

The other strongest support for the inclusion of exemptions were in relation to cotton buds and this was predominately for medical reasons. However, there was an acknowledgement that paper cotton buds were already on the market, and these could readily be adopted as an alternative in most settings.

Indicative quotes

"Non plastic solutions exist for all of the above. Our green spaces are reducing at an alarming rate and wildlife has to get a break. We are increasingly aware of the dangers to our planet, let Wales be brave and demand that manufacturers have environmental and conservation principles are the forefront." **Anonymous**

"There should be no exemptions. Perhaps temporarily, whilst alternatives are made more readily available (such as encouraging new businesses in Wales to make these items), but eventually (and as soon as possible!) all these single use items (and more!) should be banned in Wales." **Julia Ziomek**

"COVID -19 has introduced a new dynamic to the requirements surrounding single use items. Whereas straws and their medical exemptions have been outlined in the consultation document - there are other areas where this could also be required i.e. for food and drink distribution in light of cross contamination of viruses such as COVID-19. Clear guidance is needed with regards to suitable alternatives for such items to ensure they meet relevant requirements and can easily be disposed of in a correct means to not negatively effect the environment." **Pembrokeshire County Council**

"There are plenty of better, biodegradable materials that can be used for these things. Items made from cornstarch, mushroom, hemp and seaweed are all strong and environmentally friendly materials." **Carys Griffiths**

Question 8: Do you agree the proposed timescale for the implementation of the bans provides sufficient time for businesses of all types to adapt? Please give reasons and where possible evidence to support this view.

Q8				
	Y	N	Answered neither yes nor no	No answer
Numbers	2,079	201	50	1,099
Percentage	61%	6%	1%	32%
<i>The calculations above are a percentage of the total responses to the full consultation (3,429)</i>				

The vast majority of respondents were in favour of the timescales originally outlined in our proposals and supported the introduction of legislation by autumn 2021. However, a small number of respondents opposed this timescale, with some respondents arguing action was needed immediately and others suggesting more time was needed to allow businesses to adapt. In relation to the former, concerns were expressed around the perceived ongoing delays in taking action and that by waiting the environmental damage associated with the littering of these items would continue. These views were predominantly expressed by members of the public and environmental non-government organisations such as Surfers Against Sewage.

Of those who felt the timescales were insufficient, a number cited the impact of COVID-19 on businesses and in particular the current reliance on takeaway food packaging. In particular, concerns were raised over the potential stockpiling of these items during this period and the risk of these items being discarded once a ban came into effect. To address this, the Association of Convenience Stores suggested a 12-month transitional period should be adopted to allow businesses to sell through remaining stock. A number of other food and drink manufacturing companies supported this view, noting that identifying and trialling alternative packaging can often take longer than 12-months. Those who raised these concerns considered communication with the sector on our intentions and which items would be banned to be crucial.

A number of responses received as part of a campaign from the plastics industry highlighted the need for an exemption or longer period for compliance for independent kebab and fish and chip shops. They suggested these businesses have been severely affected by the pandemic and would not stand up to extra demands and costs at the present time. However, other respondents countered these views with concerns that the continuing use of single use plastics was putting an unacceptable pressure on the environment and reusable alternatives were safe to use.

On the particular issue of straws on cartons, a number of manufacturers and food and drink industry responses highlighted they had developed paper straws for carton drinks which are either in the pipeline or already in production. These respondents did not see an issue with the rest of the market adapting in the proposed timescale. However, others suggested pushing the timescale too much may result in a switch to

more plastic heavy options, such as plastic bottles. As discussed under Question 1, the timescale was raised as a particular concern in relation to on-carton straws provided for school milk. A number of respondents also noted legislation to restrict the sale of straws in England was, at the time of the consultation, due to be introduced and this was likely to drive forward wider industry change. Respondents from across the packaging and manufacturing sector expressed reservations as to whether the bans on their own would address the littering issue and education, enforcement and punitive actions were also needed.

Indicative quotes

*“I realise businesses need time to adjust and find alternative methods but unless they are pushed this will be a slow process. It needs to be driven by government and we need to have a massive push to make a better world now before it’s too late. It’s never too early to start. Businesses should be made to accept the social and moral implications of selling products that are harmful to the environment and every living thing on this planet and for too long this has not been the case. The sugar tax has recently been introduced to force companies to face this and it’s about time businesses were forced to change and acknowledge the harm they are doing to the environment with their products and waste.” **Anonymous***

*“You obviously need to allow a bit of time to implement these measures, but the sooner it's done the better.” **Swansea Greenpeace***

Question 9: Do you agree with the use of Civil Sanctions?

Q9				
	Y	N	Answered neither yes nor no	No answer
Numbers	2,103	104	37	1,185
Percentage	61%	3%	1%	35%
<i>The calculations above are a percentage of the total responses to the full consultation (3,429)</i>				

There was clear support for the use of Civil Sanctions by respondents, with many agreeing this would provide a proportionate response to any breaches of the regulations. It was noted similar measures had been used for enforcing other environmental regulations such as the single use carrier bag charge and the microbeads ban. One respondent noted utilising the civil courts would help reduce the burden already placed on Magistrate and Crown courts. However, a small number felt this approach was too lenient and criminal sanctions/ large fines were required to ensure compliance.

A number of responses welcomed our proposal for enforcement bodies to work closely with retailers to help improve awareness and understanding of the regulations before enforcement action was undertaken. It was suggested the provision of guidance would help retailers make informed choices about the alternatives. Others felt this approach was also required for the wider public to help shift consumer behaviour away from single use and towards reusable products.

Some respondents raised the potential resource implications required to undertake this enforcement action and the likely impact this would have on monitoring compliance. This was a particular concern for those responding on behalf of Local Authorities. It was felt additional funding and/ or guidance would be needed to address this issue.

No views were provided on the type of civil sanction system which should be introduced, however, there was general sentiment that any penalties should be flexible rather than fixed. It was felt this would ensure fairness between small and larger businesses and operating a sliding scale would encourage businesses to comply rather than ignore the regulations.

Respondents also suggested fines or penalties should be ring-fenced for environmental, anti-pollution or litter picking purposes rather than taken as income by government.

Indicative quotes

*“For businesses to change we need a reward scheme or grants that make alternative methods a more attractive option. Mass producers of plastics and pollutants should be penalised through heavier taxing etc..” **Anonymous***

“Businesses will generally not comply if it is likely to cost them money, or if they think it likely. Enforcement is the only way forward. See your own example of the reduction of the usage of plastic bags.” **Jan Underwood**

“If a ban were imposed there would be a need for a deterrent for breaches. Practicality of enforcement and imposition of Civil Sanctions may render the ban unenforceable, especially in light of other pressures on enforcement staff in local authorities for the foreseeable future.” **Welsh Local Government Association**

“Yes, we agree with the proposed use of Civil Sanctions subject to regular reviews as to their effectiveness and with a commitment to changing the sanctions to more effective ones if the proposed ones are proven not to be effective.” **Friends of the Earth Cymru**

“I would like to say no, but... If sufficient support is given- including financial- to Wales businesses, there will be less resistance to supplying replacement products. However, it is likely the case that most single use plastics are coming into Wales, rather than being made here. So organisations supplying the single use stuff to consumers will likely be trying hard to resist the change.” **Anonymous**

“Yes, and enforcement should use whatever methods are deemed appropriate by the enforcement unit (for example, annual audits/compliance checks). We suggest aligning sanctions and enforcement with the corresponding bans in England, as far as practicable, so that it is easier to understand and comply with for both businesses and consumers. Clear guidance should also be provided to businesses across the supply chain well in advance of the onset on any ban.” **British Soft Drinks Association**

Question 10: Do you agree that Local Authorities should enforce the ban?

Q10				
	Y	N	Answered neither yes nor no	No answer
Numbers	2,160	131	32	1,106
Percentage	63%	4%	1%	32%
<i>The calculations above are a percentage of the total responses to the full consultation (3,429)</i>				

There was broad support for our proposal, with respondents acknowledging the existing expertise and experience in Local Authority officers enforcing these types of regulations. However, this support was often caveated with concerns on the likely pressures these additional monitoring and inspection duties would place on existing Local Authority resources, particularly in light of the COVID-19 pandemic. To help address this, there were numerous calls for additional funding and resources to be provided to Local Authorities. Some respondents also suggested extending enforcement capabilities to others to help ease the burden, whilst others stressed the need for public education and information campaigns to support the regulations.

Another respondent advocated the use of community groups to work alongside retailers to help provide support for sellers in finding suitable alternative products.

Other concerns raised by respondents included the potential for inconsistency between Local Authorities in how the regulations were enforced and a small number of respondents recommended an all-Wales approach was needed to enforce the ban.

Indicative quotes

“However I do want to see an actual enforcement strategy with actual results. Litter fines already exist but with very little actual enforcement they do not work as a deterrent evidenced by the large amount of litter in Wales. So if local authorities are responsible for enforcement, the enforcement needs to actually happen. I would also want to see this combined with an education campaign promoting anti littering and minimising usage if plastic.” **Anonymous**

“Yes, we agree. It is important that Local Authorities do not suffer financially through any extra responsibilities however, so it is important that they receive financial help in order to provide the most effective service possible. We recommend the Welsh Government introduce a Latte Levy on single use cups in Wales and use some of this money to pay for other waste reduction and minimisation initiatives such as enforcing these bans.” **Friends of the Earth Cymru**

“There is an expectation within the consultation document that local authorities will carry out the enforcement role ‘given their experience enforcing broadly similar, existing requirements’ and however there is no reference to the resources required to undertake this role. This is possible however with stretched resources across LA's in Wales consideration needs to be given to resource capacity not just experience.

“Assurance is required to ensure there this is adequate resources/funding to ensure the capacity to undertake what is an already stretched resource. Further information is also required surrounding the method and point of enforcement i.e. manufacture, sale or distribution. Consideration also needs to be given to the monitoring of new "green" products - compostable/ biodegradable containers are an area where we have seen recent innovation but without the evidence to support the recyclable claims from an "easily recyclable" perspective - this may be an area which is supported through Extended Producer Responsibility (EPR). The consultation document also makes no reference to how this would be undertaken - is this at the point of manufacturer or point of sale? Many of these products are manufactured outside the UK and the number of outlets at which these 9 products are sold or used is significant and this would need to be covered in the legislation and guidance associated with the ban.” **Pembrokeshire County Council**

“LARAC agree Local Authorities should enforce the ban which would be consistent with similar interventions in Wales and the SUP plastic ban for England. Local Authorities must be appropriately resourced to deliver against this additional burden.” **Local Authorities Recycling Advisory Committee (LARAC)**

Question 11: Should wet wipes be included in future proposals for further bans or are there other measures which could be introduced to address them, for example Extended Producer Responsibility? Please give reasons and where possible evidence to support this view.

Q11				
	Y	N	Answered neither yes nor no	No answer
Numbers	2,166	161	46	1,056
Percentage	63%	5%	1%	31%
<i>The calculations above are a percentage of the total responses to the full consultation (3,429)</i>				

There was very strong support for the inclusion of wet wipes in our proposals and whilst views varied on the timing, a large number suggested they should be included in the first phase of action. Some respondents suggested a more nuanced approach was needed with wet wipes, with regulations targeting those products advertised as “flushable” but which did not biodegrade or break down in the same way as toilet tissue. A number of campaign responses by Dŵr Cymru Welsh Water supported the use of the ‘fine-to-flush’ standard, although those from environmental groups and others suggested other measures may also be required.

There were strong calls to maintain access to wipes for hygiene purposes, with particular reference to their importance to some disabled and older people as well as those caring for infants or young children. One manufacturer of specialist wipes used in healthcare settings explained how the materials used are chosen for their unique properties, with each type of wipe designed for a specific cleaning or disinfecting purpose. They cited research as to how a change to natural materials can reduce effectiveness and listed specialist applications which should be exempted from any ban on plastic content. They highlighted disposal of wipes in these types of settings were more controlled than in a domestic situation.

In general, concerns were raised from respondents around the increased use of wipes during the COVID-19 pandemic and how those wipes were being disposed of. Taking some of this into account, some respondents suggested alternative strategies other than a ban, which would allow wipes to remain on sale. These included:

- An Extended Producer Responsibility (EPR) scheme for wet-wipes;
- Taxation on producers for every wipe produced which would be ring-fenced to deal with issues in the wastewater system (similar to EPR);
- More education and clear labelling that these items are not to be flushed;
- Better regulations and standards, banning the phrase ‘flushable’;
- Switching to non-plastic-based wipes e.g. bamboo wipes or washable cloths, where possible; and
- Allowing the sale of wipes which biodegrade within a set time limits.

Indicative quotes

“Unless a demand is created for non-plastic containing wet wipes and other disposable items then companies cannot be expected to make them. Such wholesale changes need to come in a top down approach, as many consumers are not aware of the issue, in a position to change or, sadly, care enough to do so. Responsibilities need to be placed on everyone, especially those with the power to make real change such as government and local authorities to set the example and drive change. As an ecologist, I am constantly asked to prove that I practice in my personal life what I preach in my professional life and it is only because I am able to show this that my advice is taken more seriously. I expect my government to do the same and lead the way for others to follow.” **Samantha Shove**

“Wet wipes should be banned now and not sold. Most on the ingredients in a wet wipe are plastic. I've used them extensively over the years but I'm making a conscious effort not to use them anymore. I don't believe wet wipe manufacturers communicate that wet wipes are made from plastic on their packaging and only communicate the ingredients that are on the wipe, i.e. the cleaning agent.”

Anonymous

“What is critical is that whatever action is agreed, it is applied swiftly, and monitored for its effectiveness to ensure it is adequate and effective at protecting the environment. In the year 2018-19 in Dŵr Cymru’s operational area alone, there were 21,979 sewer blockages, these blockages caused 250 internal flooding events and 4162 external flooding events, data collected by [Dŵr Cymru and Water UK study on Sewer Abuse](#). The cause of the blockages was overwhelmingly what we refer to as ‘sewer misuse’. Misuse includes improper fat, oil and grease disposal, but we note that more than 30% of blockages have wet wipes as their primary cause. It is also noteworthy that the majority of all blockages have wet wipes as a component, banning their use or having a progressive levy would dramatically reduce the number of blockage and impact on customers. This would reduce flooding events and all the pollution and misery caused by wet wipe blockages.” **Dŵr Cymru/Welsh Water**

“Not all wet wipes are composed of “plastic” materials or synthetic polymers. Some wet wipes do contain natural polymers such as cotton, viscose, lyocell and wood pulp. Some wipes are blends of synthetic and natural polymers. The vast majority of healthcare wipes that GAMA Healthcare supply are blends of synthetic and natural polymers. The non-woven wipe substrates have been designed and engineered for specific cleaning and disinfection tasks. Wipes made of entirely natural fibres can interfere with the action of disinfectants, allowing microorganisms to survive. Instead, synthetic fibres reduce active agent adsorption from the disinfectant solution. ([Efficacy of disinfectant-impregnated wipes used for surface disinfection in hospitals](#)).” **GAMMA Healthcare**

“During the pandemic wipes and specifically antibacterial products have played an important role in helping to keep the population healthy by providing convenient access to hygiene when access to soap and water is limited. The value and effectiveness of hygienic wipes in the quest for sanitisation (both within and away from the home) has led retailers to restrict purchasing of these necessary products on numerous occasions during the pandemic. Single use wipes remove and prevent

the spread of harmful pathogens, hence promoting health and wellbeing. ([Improving Cleaning and Disinfection of High-Touch Surfaces in Intensive Care during Carbapenem-Resistant *Acinetobacter baumannii* Endemo-Epidemic Situations](#)). The domestic and medical use of wipes plays an important part in preventing the spread of many potentially fatal infections.” **Body representing some manufacturers**

Question 12: Are there any other items that should be included in any future policy proposals to tackle single use plastics? Please give reasons and where possible evidence to support this view.

Q12				
	Y	N	Answered neither yes nor no	No answer
Numbers	1,316	672	40	1,401
Percentage	38%	20%	1%	41%
<i>The calculations above are a percentage of the total responses to the full consultation (3,429)</i>				

There was support for a move towards a deposit return scheme for drinks bottles and cans, along with greater action to remove other single use plastics from our lives. A number of additional items were suggested for action and whilst some of these items can be found littered, others appeared to be identified on the basis they were considered single use or an unnecessary use of material. However, for the most part no specific rationale was provided when people nominated an item for future action.

The items suggested included:

- Plastic drinks bottles including milk bottles with a return to glass bottles or non-plastic lids;
- Disposable razors, lighters and other products;
- Packaging on fruit and vegetables e.g. cucumbers;
- Farm/silage wrap and feed bags;
- Coffee cups, plastic 'safety lids' and paper cups with a non-recyclable plastic lining;
- Take away/single serving condiment sachets, the plastic stand used in takeaway pizzas to stop the lid being crushed onto the pizza and similar items;
- Toothbrushes;
- Glitter, balloons, confetti, bunting and similar temporary decorative items;
- Multi-buy wrapping e.g. around tins of baked beans or beer tins;
- Poo bags for dogs, baby nappy sacks and non-biodegradable bin bags;
- Makeup / baby wipes, non-reusable nappies and similar;
- Plastic ties, packaging and supports on children's toys which are not part of the toy;
- Astro turf and plastic coatings for homes and driveways;
- Laminated paper adverts in newspapers and magazines or junk mail;
- Sandwich packets and black plastic ready meal trays;
- Cellophane wrappers e.g. on cigarette packets and non-recyclable packaging for sweets and crisps;
- Single use sanitary products;
- Plastic tags e.g. to hold price or size labels on clothing;
- Plastic clothes hangers in shops;
- Single use bags and plastic 'Bags for Life';

- Fishing nets and lines (commercial and leisure);
- Tea bags and coffee pods;
- Plastic tampon applicators;
- Bottle tops and milk carton lids;
- Food wrappings including shrink wrapped vegetables and washed salad bags;
- Lollypop sticks, sweet wrappers and similar items;
- Takeaway coffee cups with plastic liners;
- Single serving sauce sachets and tubs;
- Disposable nappies;
- Face masks and gloves in non-medical settings;
- Disposable aprons;
- Plastic cigarette butts;
- Chewing gum;
- Fishing gear; and
- Microfibres from clothing.

Question 13: What effects do you think there would be on the Welsh language?
How could positive effects be increased, or negative effects be mitigated?

This question sought a narrative response. Of the 180 respondents who answered, a majority of were unable to identify any adverse impacts our proposals would have on the Welsh language. A very small minority of respondents used this question to raise a point about the costs of producing information bilingually.

A number of respondents offered broader views on the potential for the proposals to have an indirect benefit on the language. For example, by providing an opportunity for greater bilingualism on packaging of alternative products made in or produced for Wales.

Indicative quotes

“I’m welsh and speak fluent welsh and I see no negative impact on the welsh language or to Wales. This may be an opportunity for welsh business owner to produce their own reusable utensils which are branded by their welsh business bilingual.” **Anonymous**

“I can't foresee a negative or positive impact.” **Anonymous**

“Methods to ensure a more positive impact on the Welsh language could be integrated such as bilingual guidelines, bilingual awareness raising campaigns.”
Alun Morgan Owen, Anglesey County Council

Question 14: Please also explain how you believe the proposed policy for banning the distribution and /or sale of the proposed single use plastic items could be formulated or changed so as to have positive effects, or increased positive effects, on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

This question sought a narrative response. Of the 760 respondents who provided an answer to this question, all agreed the proposals did not treat the Welsh language less favourably than the English language.

Some general points were raised in relation to ensuring the use of the Welsh language in any communication campaigns to support the regulation, the potential for the proposals to show Wales in a positive light and the need to protect our cultural heritage.

Indicative quotes

*“I don't really see how language and this issue are linked, but of course, taking progressive measures puts Wales on the map globally and this in turn solidifies people's pride in their Welsh identity.” **Anonymous***

*“Welsh Government assistance could be proactive for businesses that would wish to have Welsh language translation services available to promote the non-plastic USP on their products.” **Anonymous***

*“Wales could be seen to be leading the way in this and perhaps Welsh language could be used to educate people in finding alternatives - translations for other products or tag-words and "slogans" that could be incorporated into everyday use and/or learning at school.” **Anonymous***

Question 15: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

This question sought a narrative response. There were 371 responses to this question and these covered a wide range of issues, comments and suggestions in relation to single use plastics. A number of respondents provided a list of items in response to this question. A number of respondents also provided responses independent of the web forms provided and these were often in the form of wider observations rather than in relation to specific questions. For ease of reference, some of these responses have been included under this question. A summary overview of both the direct and indirect responses to this question is provided below:

- For the proposals to be introduced as quickly as possible, as there was an urgent need to address the environmental impacts associated with the use and littering of single use plastic. This was considered particularly relevant in light of the recent changes in consumer behaviour as a consequence of the COVID-19 pandemic (for example, greater use of take-away food services).
- A need for consistency in how any regulations would be implemented and enforced in Wales. Others noted this consistency should also extend to other nations in the UK (should they follow a similar approach) to ensure the policy would have the maximum impact in reducing reliance on single use plastics. One respondent also noted the potential implications of the UK Government's Internal Market Bill on the proposals.
- Wales should not wait for the rest of the UK and take the lead as we did with the single use carrier bag charge. However, some respondents felt as the issue of plastic pollution was a UK and global one, there was a need to ensure collaboration with others in relation to research and sharing best practice.
- Food packaging and plastic manufacturing organisations highlighted the need to ensure the proposals did not impact upon public safety or food safety and hygiene.
- The need for LCAs to be undertaken for alternative materials to ensure they also do not also pose a risk to the environment. Similar concerns over the potential for products to include more plastic packaging to replace items that were banned, for example, the need for drinks cartons to have caps if plastic straws were banned.
- For the proposals to be designed and delivered as part of a holistic approach to tackling the issues associated with single use plastics. This included the needed for wider interventions such as the use of taxes, charges or levies, the introduction of a Deposit Return Scheme for drinks containers, an Extended Producer Responsibility Scheme and a move towards a circular economy.
- Greater support was needed for retailers who promote 'bring your own containers' or refill options as an alternative to plastic.

- Focus on the big businesses and importers who generate much of this waste not small local business who sell the products.

A number of respondents also took the opportunity to raise concerns and/ or provide comments on a range of environmental issues outside the scope of this consultation. These included:

- The need to address fishing gear washing up on the beaches;
- The impact of cleaning products and their effects on human and animal health as well as the environment;
- The impact of microfibres and the need to mandate filters on washing machines;
- Stricter enforcement on litter and fly tipping;
- Increased electric charging points on council / Welsh Government land to promote electric vehicle use, especially in rural areas;
- More recycling of soft plastics in Wales to provide jobs and remove the environmental impact of vehicle mileage; and
- Clarification on what happens to single use plastics if they are placed in recycling bins.

Responses to the Easy Read Version of the SUP consultation

Question 1: Do you agree with our plan to reduce the amount of single use plastic in Wales? If no, could you tell us why?

Easy Read – Q1			
	Y	N	Answered neither yes nor no
Numbers	93	4	55
Percentage	61%	3%	36%
<i>The calculations above are a percentage of the total responses to the easy read consultation (152)</i>			

As outlined above, the majority of respondents supported our proposals. Only a small number of respondents provided a reason for their answer (8). Those agreeing with our proposals gave reasons centred around protecting the environment and reducing litter. There was a suggestion in relation to building specialist recycling plants in Wales (see below). Another suggested banning plastic bags would potentially cause problems for those needing home deliveries. However, this was considered a problem which could be addressed by industry.

Indicative quotes

“We need to consider alternative methods. Why not insist all single use plastic is all 100% recyclable, and build specialised recycling plants in Wales to take care of all Wales products, plus income generate from our English neighbour. Not an overnight solution, but the sooner the ball starts rolling...” **Ken Jones**

“Manufacturers are already legally responsible for disposal of their products. Enforce 1990s EC laws as intended. Brexit is not an excuse as laws still stand until they are changed. Plant based plastics are already on the market, so ban all other plastic manufacture. There should be no exemptions, not even for medical devices. 1993 EC law for devices considers the environment and these laws still need to be applied and chemical plastics need to be excluded from the environment altogether.”
Anonymous

Question 2: Can you think of any other single use plastic items we should include on the list we gave you at the beginning of this questionnaire?

This question didn't ask a yes or no question, so there is no table to show. There were 67 positive responses to this question and a range of additional items were suggested. These are summarised below:

- Wet wipes, including baby wipes and 'flushable' wipes;
- Packaging on vegetables e.g. cucumbers and peel off plastic 'tops' on packs of soft fruits;
- False nails, eyelashes;
- Sanitary products including tampon applicators;
- Blister packs for medicines or vitamins and similar packaging;
- Crisp and sweet wrappers including mixed paper products e.g. Pringles tubes;
- Plastic bottles for drinks, plastic lined cardboard single use cups from takeaways;
- Multipack wrapping and six/four pack plastic rings on drinks cans;
- Thin plastic bags e.g. for vegetables or used to cover meat which is already packaged in plastic at the supermarket till;
- Plastic where cardboard boxes are already in place to protect goods e.g. children's toys;
- Non-recyclable plastic including items labelled 'compostable' or 'biodegradable' where no waste disposal stream exists for kerbside collection;
- Disposable / single use facemasks outside of the medical sphere;
- Balloons;
- Laundry / dishwasher pods and microfiber shedding from laundry;
- Expanded polystyrene packaging in all forms;
- Yoghurt pots;
- Condiments or milk packaged in single portion packs; and
- Hay / silage wrapping.

Question 3: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

This question didn't ask a yes or no question, so there is no table to show. We received a total of 25 positive responses to this question. However, several respondents also provided responses more appropriate to this question in other sections of the response form, these have been consolidated into this question.

There was general support for banning single use plastics while also going further and looking at more items. Several respondents noted that while it remains cheaper for companies to use non-recyclable plastics, there is no incentive to change their behaviour. A number of responses called for clearer guidance on recycling and better labelling of products with recycling instructions. Some respondents raised concerns over the amount of packaging of food for commercial / logistical ease was contributing to many people's household waste.

Bottled water was also highlighted as an issue, with questions as to the unsustainable nature of shipping a product which is easily available from a tap. The environment was a concern for several respondents, particularly litter on the coastlines and in the seas and the effects of micro-plastics on animals. There were also calls for increased bin and recycling provision at tourist spots and along the coasts.

A number of respondents asked for government to 'think outside the box' to help reduce waste and promote recycled goods, including financial penalties / support for manufacturers and an increase in the use of Welsh on packaging used in Wales. There were also calls to provide more education on the issues and where possible link the effects to local situations relevant to people.

Government response – next steps

Urgent change is needed in both our use of plastics and the law regarding their sale to avoid a toxic legacy being left for future generations. Many people in Wales are already taking action to reduce our reliance on single use plastics, changing habits and making products and services more sustainable. As a government we are committed to supporting their efforts. This includes using the powers available to us to abolish the use of more single use plastics and encouraging more communities and businesses to make positive changes that reduce plastic waste.

Plastic products are often difficult to recycle, frequently disposed of inappropriately and persist for many years, resulting in them accumulating on our streets, in our countryside and on our beaches. Once they do break down, they cause harm to our wildlife, with growing evidence of plastic being found in fish, shellfish, sea birds and marine mammals, some of which are part of the human food chain. Research shows plastic in the environment attracts and absorbs other pollutants, such as heavy metals, making it even more dangerous to the animals, microbes and plants which come into contact with it. The long-lasting, wide-ranging, uncertain and rapidly accumulating impacts of plastic pollution demands a radical and resolute approach.

We therefore welcome the large number of responses and views received to this consultation. It was evident from the feedback provided that there is strong support for our legislative proposals, with many urging us to go further. This demand for action is evident in the growing number of “Plastic Free Communities” being established across Wales, and the many young people are championing action to tackle plastic pollution, including those in the Welsh Youth Parliament.

On 5 July 2022, the First Minister of Wales announced that the first phase of work to tackle littered plastic pollution will be delivered through the Single Use Plastic Products Bill, to be introduced during the second year of this Senedd term. This is the first step in a programme of measures aimed at tackling plastic pollution and delivering on our Programme for Government commitment to abolish commonly littered single use plastic products.

The proposals in our consultation were to ban single use plastic cutlery, plates, stirrers, drinking straws, cotton buds, balloon sticks, expanded and extruded polystyrene cups, food containers and products made of oxo-degradable plastic. Following feedback from the consultation, I am keen to go further and intend to use this legislation to drive our wider waste ambitions set out in our [Circular Economy Strategy, Beyond Recycling](#) and our draft [Litter & Fly-tipping Prevention Plan](#). This includes actions for Wales to become the first country to send zero plastic to landfill and to reduce our reliance on fossil fuel derived products contributing to the climate and nature emergencies.

Shifting away from using plastics will require us to change our habits, to become used to accessing products and services in different ways. Such change is entirely possible, as many innovative businesses and enthusiastic communities across Wales demonstrate to us every day. We are mindful of the fact that some people and businesses will find the changes more difficult than others and will need time and support. There is, however, an urgent need to accelerate the rate of change in order to prevent creating environmental damage at significant cost to present and future generations. Equally, there are opportunities for local economic benefit, for communities to come together around the desire for a cleaner local environment.

The consultation on single use plastics reflects the extent to which the public in Wales demand change, their commitment to realising these benefits and to overcoming the challenges. We are committed to ensuring the reforms we bring forward in this area respond to the leadership shown by the Welsh public, to bring about a decisive shift in our use of plastics for a greener, fairer and more prosperous Wales.

ANNEX 1

Senedd Ieuenctid Cymru / Welsh Youth Parliament - Litter consultation workshop

The Deputy Minister for Housing and Local Government, along with Welsh Government representatives, attended a virtual workshop of the Welsh Youth Parliament on 3 October 2020 to discuss and seek feedback on the Reducing Single Use Plastics consultation. Attendees were presented with an overview of the proposals and invited to offer their comments/ feedback.

The Welsh Youth Parliament had also launched its own consultation on plastic litter and waste prior to the Welsh Government's consultation. The outcome of this can be found in their [REDUCE, REUSE, RECYCLE report](#).

Consultation

General views were provided on how the Welsh Government currently engaged with young people through its consultation processes. A number of comments were made on the potential for young people to be deterred by large formal documents and the provision of an easy read version for this consultation was welcomed. However, suggestions were also made for the Welsh Government to consider using alternative methods of engagement, for example through the use of various social media platforms like Instagram and Tik Tok.

There was broad support from the attendees of the need to take action on all the items listed in the consultation. However, concerns were raised by some regarding potential negative impacts on disabled people from banning straws. There was broad support for retaining access to single use straws for those individuals who needed them. Similar concerns were raised in relation to wet wipes as they were considered a vital asset to maintaining hygiene and independence. There were calls to move towards supporting more eco-friendly alternatives and more education on disposal and the whole supply chain impact of these wipes. Some Youth Parliament members also highlighted the potential risk of those who opposed such bans on health and disability grounds being stigmatised for not caring about the environment when this was not the case.

One Youth Parliament member noted there were often socio-economic barriers to young people doing the right thing when it came to buying alternative products. For example, those living in less affluent areas may not have plastic free shops or may find alternative products too expensive. It was felt more could be done to improve the access and affordability of these products.

There were concerns raised over whether products marketed as being more "eco-friendly" were as claimed. An example was provided of products made of cotton, as these often required large amounts of energy and resources. Comments were made around the growing trend of 'greenwashing'. For instance, products being sold as being beneficial for the environment when this may not necessarily be the case. The group suggested more information was required to help people to make the right decisions.

Members were then asked to consider other additional products they would like to see included in our proposals. A number of items were referenced including:

- Single use sanitary products – specifically tampon applicators;
- Crisp packets and baby food pouches – These were suggested as it was noted that whilst these items can be recycled, there were very limited numbers of recycling plants across the UK which could do so. The idea of increasing the cost of products in non- or difficult to recycle packets was suggested;
- Food packaging and wrapping found in supermarkets; and
- Plastic tags on clothing.

Other comments

There was broad support for other Welsh Government proposals including the proposed introduction of a Deposit Return Scheme for drinks containers. The principle of 'polluter pays' and extended polluter responsibility for the whole of an items life, for plastics and other goods, was also supported.

Wales Environment Platform Workshop Event

The purpose of the event was to gather some technical input from academics and other stakeholders regarding some of the more technical aspects of bringing forward regulations to ban single use plastics.

As part of the workshop, we had some discussions around the definitions of plastic we may use in the regulations.

We also sought views as to other items we could potentially act on in the future. The items suggested have been included in the responses to question 12.

The output from the day consisted of 6 'online whiteboard' outputs answering the following questions:

- How should we define "plastic"? and what should we be considering as "single use" plastics?
- Should we consider oxo-degradable plastics and/or biodegradable plastics as part of the ban?
- How prevalent are these currently?
- What are they used for currently?
- Should we be concerned about increasing use of oxo-degradable and/or biodegradable plastics in the future?
- What are the likely future uses?

The attendees also considered how single use plastic items could be prioritised for future action.

Community Event for Reducing Single Use Plastic Consultation – Pontypridd

The Deputy Minister for Housing and Local Government attended a community event focused on reducing single on 15 October 2020.

The following discussion points were raised in response to the Deputy Minister's introduction as to what the Welsh Government is doing to reduce single use plastic and develop a circular economy in Wales.

1. Widespread support was given for the proposed bans included in the *Reducing Single Use Plastics* consultation and wider efforts to reducing littering / waste.
2. One attendee suggested people could be encouraged to bring in their own, reusable metal (or other alternatives) drinking straws into restaurants, cafes and pubs if plastic ones were banned.
3. There was some acknowledgement reusable items were becoming more mainstream, however, zero waste options were still hard to find and often more expensive. This was a potential barrier for those in lower socio-economic groups who wanted to do the right thing. It was felt the Welsh Government could do more to ensure sustainable / more environmentally friendly alternatives are widely and cheaply available.
4. Another suggestion was for water / drinks refills to be extended to any food outlet. Perhaps even make it mandatory for businesses to offer this service.
5. An observation was made that "eco-education" on reducing waste and anti-littering messages worked well at primary school level, however, this could be improved at secondary school level.
6. There was a discussion on the issue of littering, which highlighted eco lessons are optional for secondary school pupils. It was suggested some were 'too cool' to choose this option, creating problems in pro-environmental messaging reaching those who perhaps needed to hear it most. It was suggested social media could be used to reach such students. For instance, Zac Efron's Instagram film and previous reports of him picking litter.
7. Another suggestion was for an incentive scheme to be developed in schools where good environmental behaviour throughout the term would be rewarded (for example a free school trip).
8. One participant presented a light-up, large bin they had made from repurposed plastic bottles and suggested this itself could be used as to collect plastic recycling. They felt if schools offered the opportunity to make such a bin or similar items, it would be educational on a number of levels by highlighting the issue of recycling, reuse and repurposing of waste materials while teaching craft/engineering skills.

9. Another participant highlighted the issue of over packaging from online companies. They suggested this was further exacerbated by warehouse practices, which required suppliers to package their items for sale in plastic bags to make picking easier. There was general consensus greater pressure and responsibility needed to be placed on producers and manufacturers.
10. The issue of the use of plastic in schools to serve school meals was raised. This included the issue of cling film and plastic cutlery.