Response from Wrexham County Borough Council

Reducing Single Use Plastic Consultation Paper

Question 1: Do you support our proposal to ban each of the single use plastic items listed above?
In principle WCBC is supportive of the proposal to ban the use of the plastic items mentioned in the consultation document, and recognise the significant impact that this could make on our communities and the environment more generally. We believe it appropriate to make certain exemptions and clarifications, which will be explored further in this response.

Question 2: Do you agree the potential environmental and social benefits of our proposals will outweigh the potential impacts on people in Wales?

The potential positive environmental impacts are clear. However, we do have some concerns about the impact on local businesses (e.g. manufacturers of these goods), and on retailers/hospitality sector who use these items. Industry, retail and the hospitality sector have been impacted significantly be the Covid-19 pandemic, and we would ask Welsh Government to carefully consider the timing of this secondary legislation; as a decrease in production or increase in running costs could prove catastrophic for some businesses.

Question 3: Do you agree with our assessment of the potential benefits and impacts our proposals will have on businesses, including manufacturing, in Wales?

As described in Question 2, we would have some concerns about the potential impact on manufacturers, retailers and the hospitality sector – given the significant impact of Covid-19. That's not to say that we would be unsupportive of these bans, but that timing needs to be carefully considered. We believe there is opportunity for some SME to develop alterative products/solutions to single-use plastic, and would recommend that WG considers funding which supports these businesses to develop.

Question 4: Should oxo-degradable plastics be included on the list of items to be banned?

WCBC's view is that further research needs to be conducted to understand the current usage of these plastics prior to any ban being introduced. This research would help to identify potential impacts of a ban and identify any concerns about its implementation. We would also draw attention to the importance of greater clarity for the range of products currently available and advertised as alternatives to single-use plastics (e.g. compostable items), which are often not easy to dispose of and recycle.

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?

The impact of Covid-19 has been unprecedented and has far-reaching implications for the way that services are being delivered. For example, within our school meals service we are using 'disposable' items such as paper cups, cardboard trays,

compostable cutlery etc. However, there is still a need for us to use plastic trays for food presentation and storage (these are reused where possible but this is not always practical), and there are no suitable alternatives available. Covid has also seen an increase in use of other plastic based single-use items such as aprons and facemasks – all of which will have a significant environmental impact. In the retail and hospitality sector we have seen a return to the use of single use cups (for example), as the risk of contamination is to high when using re-usable items (e.g. customers presenting their own coffee cups

Question 6: Do you agree with the exemptions we are proposing and how can we make them as clear and practicable as possible to apply?

We agree with exemptions on medical grounds such as use of plastic, single-use straws within older people's care. We would also like to see clarification around other exempted usages such as within special education settings or in some prisons. We feel that there may be other exemptions necessary in order to maintain current strict hygiene practices in some instances; and even when Covid-19 pandemic is over, there should remain some provision for usage of single-use items in any similar circumstances where infection control becomes paramount. We would like to see a clearer definition of the exemptions, as this will be crucial to any proposed enforcement. We feel some of the language used within the consultation is too vague to allow any type of enforcement to take place (e.g. 'particularly impracticable').

Question 7: Are there other exemptions we should consider in relation to all of the single use plastic items in our proposal?

No, we have not identified any other exemptions except for those referred to above (in response to Question 6).

Question 8: Do you agree the proposed timescale for the implementation of bans gives sufficient time for businesses of all types to adapt?

We have concerns over the timescale proposed (i.e. Autumn 2021), which we feel is unachievable, or will place unnecessary hardship on businesses to implement. Given the significant impact of Covid-19, our economy (and particularly our hospitality sector) are likely to be adversely effected for some time. Our concern is that the proposal for businesses to be 'allowed to utilise existing stock' – may require longer than Autumn 2021. In addition, the additional costs to retailers and businesses of providing alternatives may prove difficult for them to meet, at a time when they require additional support and investment. We would prefer an extended timescale, which allows time for the impact of Covid-19 to be understood, and for businesses to be in recovery phase.

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

Yes, the use of civil sanctions (i.e. fine and enforcement notices) seems the most reasonable and proportion approach.

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

We have significant concern about the proposal for local authorities to enforce this ban. Our assumption is that there would be an expectation for trading standards, public health and licensing officers to play a role in this enforcement. Even before Covid-19, this would have been problematic for local authority officers to enforce, along with their other duties, working within ever-decreasing budgets. With the impact of the pandemic, we have seen our public protection officers stretched to their limits and beyond; therefore would have significant concern about this additional responsibility.

We would like to understand how Welsh Government expect to fund this additional work, and also understand the proposed practicalities of this role (e.g. at what point is enforcement appropriate? How would we monitor and respond to cases of breach?).

This area of the consultation contained very little detail, and would need significant work before implementation.

Question 11: Should wet wipes be included in future proposals for further bans, or are there other measures which should be introduced to address them, for example Extended Producer Responsibility?

It is well documented and understood that the use of wet-wipes causes a significant environmental concern, therefore we would be supportive of future moves to reduce their usage. However, we would be supportive of further research into this area to understand the wide-range of uses for these products, and further work with producers to develop alternatives and/or place further responsibility on them.

Question 12: Are there any other items that should be included in any future proposals to tackle single use plastics?

In addition to the items mentioned in the consultation, we would like to call for a ban on all plastic non-essential promotional materials (i.e. “freebies”). These items are often given out at events, with magazines, in shops etc. and are often targeted at children. They have no functional use, are often poor in quality and quickly discarded. They often unrecyclable. We believe that these items add unnecessary plastics to our waste, and promote a message which is at odds with the environmental responsibility we are otherwise teaching our younger generations. We would also like to see a ban on plastic confetti (used at weddings, celebrations and in greeting cards).