

## Scottish Government Consultation:

### Single-use plastic items - market restrictions

Scottish Youth Parliament response - December 2020

#### Question 1(a):

Do you support the proposal to introduce a restriction on the supply by businesses in a commercial capacity in Scotland on each of the single-use plastic items listed and all oxo-degradable products?

	Yes	No
Single-use plastic cutlery (forks, knives, spoons, chopsticks)		
Single-use plastic plates (plates, trays/platters, bowls)		
Single-use plastic straws		
Single-use plastic beverage stirrers		
Single-use plastic balloon sticks		
Single-use food containers made of expanded polystyrene		
Single-use cups and other beverage containers made of expanded polystyrene, including their covers, caps and lids		
All oxo-degradable products		

#### Question 1(b):

Please give reasons and where possible provide evidence to support the view expressed in response to Question 1(a).

The Scottish Youth Parliament has a large amount of policy relating to single-use packaging, suggesting that the majority of young people are generally supportive of restrictions on the supply of single-use plastic items in Scotland. However, as outlined below, we do not have enough evidence to suggest young people are fully supportive of a ban on the specific items outlined in this consultation.

The Scottish Youth Parliament's *Pack it up, Pack it in* report outlines young people's views and experiences of litter, single-use packaging, and recycling in Scotland, and makes eight recommendations to reduce pollution levels which contribute to climate change in Scotland. Although our research does not show clear evidence to support a full ban on items being made out of plastic, we recommend the Scottish Government should carry out a full review of how to reduce the use of plastic, with consideration of a full or partial ban for certain products in Scotland. Further research should also be carried out to explore the reasons why people may support or oppose a ban on products being made out of plastic.

The report asked respondents a number of questions in relation to single-use packaging. In particular, we asked if respondents would support or oppose a ban on sixteen items which commonly contain plastic. Overall, the majority of respondents supported a ban on all of the items listed being made out of plastic, with the exception of yoghurt pots (49.9% support) and sanitary products (39.8% support). The responses specifically relating to this consultation are:

- Disposable coffee cups (66.1% agree, 21.2% disagree, 12.6% not sure)
- Takeaway containers (57.1% agree, 27.5% disagree, 15.4% not sure)
- Drinking straws (53.3% agree, 36.5% disagree, 10.3% not sure)

Respondents were asked to explain why they support and/or oppose banning these products being made out of plastic. The main reasons given for supporting a ban included the view that the majority of these items do not need to be made out of plastic and therefore could be made with non-plastic materials; or that these items are harmful to the environment and therefore should be replaced with non-harmful or recyclable materials. Some respondents felt banning the use of plastic in these products would force manufacturers and others to change how they make and use packaging materials in a more sustainable way.

On the other hand, a small number opposed banning plastic straws because of concerns relating to the accessibility of alternatives such as paper straws for people with disabilities, and because they felt paper straws disintegrate too quickly. One young person told us *“Don’t ban plastic straws. People with disabilities need them to be able eat/drink without assistance or just to eat and drink. Although there are alternatives, these don’t work for all disabled people - e.g. metal straws are really hard and disabled people can hurt themselves, paper straws can’t handle hot liquids, bamboo straws can’t be sterilised etc.”* With this in mind, although we broadly support restrictions on drinking straws, these restrictions must be flexible to ensure safe and accessible alternatives are available to people who need them.

The *Pack it up, Pack it in* consultation also asked young people if there were any other packaging items they believe are damaging to the environment. Around one third of survey respondents (655 young people) commented. Nearly three quarters (71.3%) of responses related to plastic products, with over one tenth (12.8%) saying all plastic is damaging. Other respondents commented specifically on particular items that are commonly made of plastic, such as plastic bottles, food containers, bags, rings and wrappings on multipack cans, and takeaway packaging.

*(Pack it up, Pack it in report, available at <https://bit.ly/3m951od> - results of a survey with 2,051 young people aged 12-25 in Scotland between September and November 2019).*

Further to our *Pack it up, Pack it in* findings, our *From Scotland’s Young People 2021-26* manifesto includes the following calls:

- *‘The food and retail industry should make it possible for people to rely less on packaging that can only be used once.’ (85.8% agree)*
- *‘The food and retail industry should make it possible for people to rely less on packaging made out of plastic.’ (89.3% agree)*
- *‘The food and retail industry should make it possible to recycle and reuse packaging.’ (93.5% agree)*
- *‘The food and retail industry should avoid using too much packaging in their products.’ (90.7% agree)*

*(From Scotland’s Young People manifesto - available at <https://bit.ly/2lyStZq>)*

**Question 1(c):**

Do you support the introduction of a restriction on the supply in a non-commercial capacity (rather than only in the course of commercial activity) of the specified single-use plastic and oxo-degradable items?

- (Yes/No)
- Please give reasons.

**Question 1(d):**

Do you support the introduction of a restriction on the manufacturing of the specified single-use plastic and oxo-degradable items, excluding those for which exemptions will be introduced?

- (Yes/No)
- Please give reasons.

**Question 2:**

To your knowledge, are any of the oxo-degradable products identified in this document present on the Scottish market? Are there any additional oxo-degradable products available on the Scottish market that we have not identified? Please provide evidence to support your answer.

**Question 3:**

The SUP Directive includes limited exemptions for single-use plastic straws and balloon sticks. Are there other exemptions we should consider in relation to the market restrictions being proposed?

- (Yes/No)
- Please give reasons.

#### Question 4:

How can we make sure disabled people have access to plastic straws if they require them for medical reasons or to support independent living, whilst at the same time restricting wider access for environmental purposes in a way that fulfils the SUP Directive requirements?

The Scottish Youth Parliament is a rights-based organisation, and our mission, vision, and values are firmly grounded in the United Nations Convention on the Rights of the Child (UNCRC), particularly Article 12: that young people have the right to express their views freely and have their opinions listened to in all matters affecting them. With this and the following SYP policy statements in mind, we recommend the Scottish Government actively consults disabled young people on this issue to ensure they are able to meaningfully participate in the consultation. All consultation should be carried out using inclusive approaches to ensure all disabled young people can participate, regardless of their disability.

Furthermore, our *From Scotland's Young People* manifesto includes the following calls:

*'Children and young people from seldom heard groups (such as immigrants and refugees, gypsy traveller communities, single parents, disabled people, Armed Forces, care experienced, and justice experienced) must be listened to by policymakers on issues that affect them.'* (80.4% agree)

*'The United Nations Convention on the Protection of Persons with Disabilities (CRPD) should be fully brought into Scots law to protect the rights of disabled children and young people, ensure access to independent living, support those with invisible disabilities and reduce stigma.'* (82.8% agree)

In support of this statement, a disabled young person told us: *"Disabled people are far too often an afterthought in the minds of the public and decision makers. We are still dangerously perceived as burdens and disposable. This is only exacerbated when you're a disabled young person as well."*

*(From Scotland's Young People manifesto - available at <https://bit.ly/2lyStZq>)*

## Question 5:

This consultation highlights other items that the Scottish Government intends to consider market restrictions for in future (plastic wet wipes, plastic tampon applicators and those other products contained in the UK Plastics Pact's list of items to be eliminated by end of 2020 which are not currently subject to existing or proposed market restrictions). Would you support the consideration of market restrictions on these items or any other items we haven't listed? Please provide reasons and evidence where possible.

The Scottish Youth Parliament's *Pack it up, Pack it in* consultation asked respondents a number of questions in relation to single-use packaging. In particular, we asked if respondents would support or oppose a ban on sixteen items which commonly contain plastic. Overall, the majority of respondents supported a ban on all of the items listed being made out of plastic, with the exception of yoghurt pots (49.9% support) and sanitary products (39.8% support). The items discussed are:

- Disposable coffee cups - 66.1% agree
- Plastic bags for fresh produce and pastries - 61.3% agree
- Cereal box liners - 58.1% agree
- Film lids (eg, from ready meals) - 57.6% agree
- Takeaway containers - 57.1% agree
- Egg boxes - 57.0% agree
- Sweet wrappers - 56.1% agree
- Cotton buds - 55.9% agree
- Condiment sachets (eg, ketchup, mayonnaise, etc) - 55.6% agree
- Crisp packets - 53.9% agree
- Drinking straws - 53.3% agree
- Wet wipes - 53.1% agree
- Cling film - 53.0% agree
- Bubble wrap - 52.0% agree
- Yoghurt pots - 49.9% agree
- Sanitary products (eg, tampons, pads, etc) - 39.8% agree

As previously discussed, although our research does not show clear evidence to support a full ban on items being made out of plastic, we recommend the Scottish Government should carry out a full review of how to reduce the use of plastic, with consideration of a full or partial ban for certain products in Scotland. Further research should also be carried out to explore the reasons why people may support or oppose a ban on products being made out of plastic.

## Question 6:

Taking into account the accompanying Impact Assessments, can you identify any environmental, economic or social impacts we have not identified when developing the proposals contained in this consultation?

- Yes/No
- Please give reasons.

Although the introduction of restrictions on single-use packaging items in Scotland has the potential to support young people's right to a clean environment (UNCRC Article 24), young people who responded to our *Pack it up, Pack it in* consultation expressed concern about the cost of non-plastic alternatives. The high cost of sustainable packaging alternatives may have a negative impact for some young people following the restriction on single-use plastic items. Our report calls on retailers and the food industry to ensure reusable packaging is affordable, more readily available, and easy to use, to reduce the reliance on single-use packaging and plastic items. However, we would also call on the Scottish Government to ensure support is available for businesses to enable them to reduce their reliance on single-use packaging and to avoid passing on any additional cost to consumers.

Whilst just over one tenth (10.9%) of respondents said the environmental benefits of using environmentally friendly alternatives would encourage them to use these items more often, the vast majority said they would use alternatives more often if they were cheaper or free (24.2%); if they were more readily available and visible in shops and eating establishments (19.5%); or if it was easier to use them, for example, if more establishments encouraged their use, if there were more water refill stations, or if there was somewhere to wash the items between uses (12.4%). Just over one tenth (11.6%) of respondents said the material the items are made out of is important, with some saying design or attractiveness of alternatives would encourage them to use them more often (4.8%).

We also believe that we cannot separate any new policy proposals from the context and impact of the COVID-19 pandemic. It is clear that Scotland's response to the pandemic has had a huge impact on the rights of children and young people. Whilst we acknowledge that decisions had to be made quickly, and for the safety of the country's residents, it is essential that thorough Children's Rights and Wellbeing Impact Assessments are carried out for *all* law and policy that affects Scotland's young people. We would encourage the Scottish Government to review the 'Independent Children's Rights Impact Assessment on the Response to COVID-19 in Scotland', published by the Children and Young People's Commissioner Scotland in July 2020 (available at <https://bit.ly/2X3llyu>) and to commit to taking a child and young person rights based approach to recovery from the pandemic. We welcome the work the Scottish Government has done so far to engage young people in this topic. We want to see a continuation of this as this consultation and policy further develops, and action to be taken to ensure the pandemic does not affect this happening in a meaningful way. In line with Scotland's commitment to uphold young people's rights, it is essential that young people are actively consulted, engaged, and involved in any decisions that will affect their lives.

**Question 7:**

Do you believe the COVID-19 pandemic has resulted in changes to the market or wider economy that are not fully accounted for through this consultation?

- Yes/No
- Please give reasons.

Since the beginning of the COVID-19 pandemic, and particularly since the wearing of face coverings became mandatory in Scotland, there has been a noticeable rise in the number of single-use face masks and gloves which have not been disposed of safely or responsibly. This irresponsible littering is likely to have a huge impact on Scotland's environment. We believe reusable face coverings should be more affordable and more readily available in shops. There should be stronger messaging around the harmful impacts of single-use face coverings on the environment, and more positive messaging around the safety and benefits of using reusable alternatives.

Similarly, there has been a noticeable increase in the amount of takeaway packaging, such as single-use cups, being used as companies refuse to allow customers to use reusable cups and other packaging due to fears about the spread of COVID-19. While we recognise the potential risk of this, we would like to see clarification of whether or not the risks are as high as, for example, the risk of handling money or touching other surfaces within a retail environment. We believe there should be clearer guidance for retailers on the safety of using reusable packaging, in an attempt to rebuild customer and retailer confidence to avoid using single-use packaging where possible.

**Question 8:**

Do you have any other comments that you would like to make, relevant to the subject of this consultation that you have not covered in your answers to other questions?