

By email only

Wednesday 20<sup>th</sup> December

Dear Paul

## **Plastic Waste and Recycling**

Following your attendance at the plastics recycling roundtable chaired by Michael Gove, Secretary of State at Defra, you have invited us to give initial answers to five questions which the Secretary of State posed.

We welcome the leadership that the Secretary of State is demonstrating on this issue and value the opportunity to contribute to this work. We would strongly welcome the opportunity for further engagement on this issue with the packaging supply chain, waste and resources management, reprocessors and other stakeholders early in the New Year.

We have provided initial responses to the questions he posed below, but we would also like to make three overarching points:

First, effective action to reduce waste – including, but not limited to, plastics – must be based on a long-term vision of how we manage waste and accelerate our move towards the circular economy. This foundation will allow all sectors involved in waste management to work together to innovate and provide excellence in the required services.

Second, raising the obligations for use of recycled plastic will support the market for these products. This will improve the business plan for plastic recycling for waste collection and disposal authorities, which will in turn incentivise greater recycling by householders when it is simple and they can see that it makes a difference. We need the whole market to function effectively.

Third, those producing plastic packaging and plastic products should be supported and challenged to operate in a circular fashion, looking at the full life cycle of plastics and taking on responsibility for the costs and risks that their products entail. Any proposals should not increase costs to local authorities and ideally should result in shifting the cost so that the polluter pays. At present local authority residents who struggle to pay their council tax are subsidising the consumer choices made by those residents who can afford to purchase goods and products, and who generate waste as a consequence. Local authorities are not in a position to control the recyclability of products, but given appropriate regulatory and financial support and a long-term policy framework we will aim to deliver services to our residents that also enable the circular economy.

(1) How can we reduce the demand for plastic in the first place?

- Reward and / or regulate producers for the recyclability of their products and packaging
- Encourage innovation in packaging to avoid plastic use
- Extend the successful plastic bag levy to other non-necessary plastic packaging and single use products
- Specifically in relation to water bottles, support networks of drinking fountains in discussion with the water industry

(2) How can we drive simplification so that we're not only reducing the amount but also the types of plastic used?

- Ban non-recyclable plastics
- Regulate to reduce the number of types of plastics used
- Change the PRN system such that they must be purchased for each polymer type used, so that recycling is in proportion to material use

(3) How do we ensure that what we are procuring is recyclable and recycled?

- Encourage and incentivise reusable products
- Regulate to significantly increase use of recyclable and recycled plastic
- Increase recycling obligations to strengthen the market for recycle, and thus support action by local authorities; as an example, the London Borough of Southwark estimated that they could have recycled about 500 more tonnes of plastic in 2017 if an end user could have been found
- Consider medium-term development of sustainable plastics reprocessing capacity in collaboration with waste disposal authorities, the waste industry, Defra (Government) and others
- Reform the PRN and PERN system by:
  - increasing transparency around the allocation of PRNs and PERNs and the destination of funds generated
  - creating a clear mechanism for the allocation of funds generated, for example through formation of a cross-sector governance body
  - removing the de minimis element that currently allows small scale producers to opt out
  - giving PRNs more value than PERNs to incentivise and promote the development of regional and national infrastructure over export
  - increasing the standard of evidence required

(4) What interventions do we need to have in order that people are incentivised to make the right choices; how can consumers play their part?

- Explore introduction of a deposit scheme for appropriate plastic items
- Regulate to make labelling more accessible for consumers
- Strengthen government messaging around the need to reduce plastic waste

(5) How can the system support and enable Local Authorities and other waste managers to play their part?

- Enforce comparable, higher standards for recycling collection across the country, to improve the business plan for plastic recycling for waste collection and disposal authorities
- Ensure that the PRN system enables local authorities to deliver the best possible recycling services and support the circular economy

I hope these initial responses are useful. The issues are complex and urgent but we should build on the public demand for simplification and the fact that they want to use less plastic (and other packaging), to recycle more and to reduce their impact on the environment. We look forward to further engagement on this issue early in the New Year.

Yours sincerely,

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