

April 2022: Scotland: Call for evidence tackling consumption of single-use food containers & commonly littered problematic single use items
AVA Response

Part 1 - Single-use food containers

The first section of this call for evidence focuses on single-use food containers, with a particular interest in single-use plastic food containers as part of our drive to reduce the environmental impact of single-use plastic items.

While our focus is on tackling single-use plastic food containers, we are also interested in evidence on non-plastic single-use food containers. This information will help inform future decisions to implement measures in line with waste hierarchy principles of prioritising prevention and re-use over recycling and disposal to tackle consumption of single-use food containers in general.

[Related information](#)

1. Do you have any evidence of the environmental impact of single-use (plastic or non-plastic) food containers?

Please provide your evidence below

2. Do you have any evidence of the size and nature of the single-use (plastic and non-plastic) food containers market in Scotland?

Please provide your evidence below

AVA: The Vending & Automated Retail Association is the trade association of the vending industry and automated retail industry, representing machine and ingredient manufacturers and suppliers, cup manufacturers and vending machine operating companies throughout the United Kingdom. Vending operator companies in membership represent over 75% of the turnover of the vending industry in the UK.

The UK vending & automated retail industry has an annual turnover of £2.1bn, with a turnover in Scotland of approximately £129millions. It is an industry employing 24,500 people directly in the UK with over 2,000 in Scotland; a figure which is supplemented by those employed within the wider vending channel supply chain. AVA members operate over 420,000 vending machines in the UK of which approximately 35,000 are in Scotland (AVA Census 2021), vending snacks, food, soft drinks, water, hot and cold beverages.

Vending operator companies, those who provide, fill and maintain vending machines are, with one or two exceptions, small or medium sized companies, often family owned. There are 64 such companies operating in Scotland.

The vending industry uses single use plastic containers for meals in vending machines and micromarkets. Plastic plates are used for plated salad meals and bowls and trays are used for meals that need to be reheated in a microwave before consumption. Chilled vending

machines and micromarkets are installed in locations in business premises which do not have other meal provision. These locations would also not have the facility to wash up reusable crockery. The meals are intended for consumption on site, so the trays and plates do not contribute to litter. However, at present even paper-based items cannot be recycled due to the food waste and they are not suitable for industrial composting because they must have a plastic lining.

Single use containers are essential for the provision of meals from vending machines and micromarkets.

Vended food in the UK is worth £46m per year. This equates to almost 2 million meals per year in Scotland or 8,300 meals per day (AVA 2021 Census). This includes out of hours food provision in business and NHS locations.

The AVA supports The Scottish Government and all other governments in reducing litter. So long as measures recognise the role of the public in littering and are always matched by measures such as enforcing Fixed Penalty Notices for litter offending by the public whether on land, in cars or on sea. Measures to reduce litter should deal with the most frequently littered items rather than cherry pick items that make a small contribution to litter because they are simpler to target while ignoring those items making the biggest contribution either because they are items to which the public will respond negatively to bans or charges or because they producers of these items are able to harness huge funds to lobby against legislation.

If the intention is to replace plastic food containers with non-plastic ones then there is no evidence that replacing one material with another will make a difference to the volume of litter and we do not agree with the conclusion made by some for a ban on food boxes in plastic the effect of switching from say plastic to fibre would be to reduce litter disamenity and its impact on the environment, because, as some allege 'plastic-free items would disintegrate within significantly shorter timescales'. No litter is acceptable irrespective of material, product category and circumstances, a position that should be endorsed by Scottish Government.

We suspect that packaging which claims to be better if disposed of in the natural environment encourages littering and so strongly urge Scottish Government to ban the use of such packaging and associated claims. An example being the use of oxo-degradable additives which we very much hope Scotland will take a global lead in banning its use.

The purpose of EPR modulated fees is to discourage more difficult to recycle packaging, while Scotland is considering a further modulation and charge based on litter propensity. Modulation should be allowed to be implemented and run before further actions on specific packaging formats are considered. We strongly believe EPR will be very effective in encouraging more collection and will encourage more schemes to collect food boxes just as has been the case for paper cups for which UK EPR proposes the mandatory takeback of cups by obligated retailers.

Switching from one material to another makes no difference to littering behavior and many alternative use more carbon in manufacture and supply and are more problematic to recycle than the materials they replace.

3. Do you have any evidence of effective actions taken in Scotland or other nations to reduce consumption of single-use (plastic or non-plastic) food containers?

Please provide your evidence below

4. Do you have any evidence of barriers to implementing policy measures to reduce the consumption of single-use food containers?

Please provide your evidence below

The vending industry is promoting sustainability and reduction of carbon footprint and most drinks vending machines now have the facility to allow consumers to use their own cup or mug. However, at present we can see no alternative to single use containers for meals from vending machines because they are sited in locations without catering facilities. Most chilled food in vending machines and micromarkets is provided by chilled food suppliers who manage just the chilled food while the vending operator manages all the other products. However, there is one company in Scotland that both prepares food and operates vending machines.

5. Do you have any evidence related to the impact on businesses (positive or negative) that policy measures to reduce the consumption of single-use food containers could have?

Please provide your evidence below

The proposed measures would make it impossible to provide meals from vending machines or micromarkets. This would have an impact on the financial position of some vending companies, but it would make meal provision, such as salad, in some smaller businesses much more complicated and expensive since they do not have canteens.

Vended food in the UK is worth £46m per year. This equates to almost 2 million meals per year in Scotland or 8,300 meals per day (AVA 2021 Census). This includes out-of-hours food provision in business and NHS locations. Often with lower paid staff who are part of essential services.

6. Do you have any evidence of the impact that policy measures to reduce the consumption of single-use food containers might have on people with protected characteristics or who experience socio-economic disadvantage?

The protected characteristics laid down by the Equality Act 2020 are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation. Your answer might also include evidence of where single-use food containers are considered essential.

Please provide your evidence below

Upload any evidence relating to the above questions here

upload evidence

Please make sure your file is under 25MB

Part 2 - Other single-use plastic products

The second section of this call for evidence focuses on other single-use plastic products supplied in Scotland.

Evidence is also requested on the alternatives to single-use plastic products. This will help / support the move away from the current linear consumption model of take, make and consume to a circular economy approach that promotes re-use, repair and recycling to reduce waste and move to a more circular economy.

[Related Information](#)

7. Do you have any evidence of the environmental impact of the single-use items set out in Part 2 of the call for evidence paper:

a) Single-use plastic bowls, trays and platters?

Over 90% of vending machines are in 'closed' environments, such as offices or warehouses (AVA 2021 Census), therefore do not cause litter as the buildings should already have contracted recycling and waste collection services.

b) Single-use plastic period and incontinence products?

c) Single-use plastic sachets?

d) Single-use plastic tobacco filters?

e) Single-use plastic packaging on fruit and vegetables?

8. Do you have any evidence of the size and nature of the market for the single-use items set out in Part 2 of the call for evidence paper:

a) Single-use plastic bowls, trays and platters?

Vended food in the UK is worth £46m per year. This equates to almost 2 million meals per year in Scotland or 8,300 meals per day (AVA 2021 Census). This includes out-of-hours food provision in business and NHS locations. Often with lower paid staff who are part of essential services.

b) Single-use plastic period and incontinence products?

c) Single-use plastic sachets?

d) Single-use plastic tobacco filters?

e) Single-use plastic packaging on fruit and vegetables?

9. Do you have any evidence on what alternatives to single-use items set out in Part 2 of the call for evidence paper are available and any negative impacts (environmental or other) that increased use of these alternatives could have:

a) Single-use plastic bowls, trays and platters?

Vending machines are used to provide a range of meal options in locations where no canteen is available for either financial or logistical reasons. The food container for hot meals has to be sufficiently robust to allow the meal to be heated in a microwave and then to be carried safely from the microwave to the table without spilling or scalding the consumer. A reusable container could be used but it would have to be cleaned properly between each use.

Alternative materials exist such as paper and board but may not be as effective where prepared meals are reheated in a microwave, or where sauces and oils are in contact with the material, unless they include some form of lining including a plastic lining. Some may be heavier and use more carbon in their creation. Each material when used for these items has an effective role depending on the situation and the food type. Many alternative options are more expensive and may not be as easy to recycle as the original plastic versions.

b) Single-use plastic period and incontinence products?

c) Single-use plastic sachets?

d) Single-use plastic tobacco filters?

e) Single-use plastic packaging on fruit and vegetables?

10. Do you have any evidence of effective action taken to reduce the consumption of the single-use items set out in Part 2 of the call for evidence paper:

a) Single-use plastic bowls, trays and platters?

b) Single-use plastic period and incontinence products?

c) Single-use plastic sachets?

d) Single-use plastic tobacco filters?

e) Single-use plastic packaging on fruit and vegetables?

11. Do you have any evidence related to barriers to implementing policy measures to reduce the consumption of the single-use items set out in Part 2 of the call for evidence paper:

a) Single-use plastic bowls, trays and platters?

Sites which use vending machines for the provision of meals typically have no facilities or staff to clean reusable food containers or plates. The food is usually provided by a food provider, which is generally a small company operating locally to the site. These companies do not have the facilities to collect dirty plates and wash and clean

them. Setting up to collect dirty containers, deal with food waste and clean the containers would add to the cost and complexity of their business.

b) Single-use plastic period and incontinence products?

c) Single-use plastic sachets?

d) Single-use plastic tobacco filters?

e) Single-use plastic packaging on fruit and vegetables?

12. Do you have any evidence related to the impact on businesses (positive or negative) of policy measures to reduce the consumption of the single-use items set out in Part 2 of the call for evidence paper:

a) Single-use plastic bowls, trays and platters?

Vended food in the UK is worth £46m per year. This equates to almost 2 million meals per year in Scotland or 8,300 meals per day (AVA 2021 Census). This includes out-of-hours food provision in business and NHS locations. Often with lower paid staff who are part of essential services.

b) Single-use plastic period and incontinence products?

c) Single-use plastic sachets?

d) Single-use plastic tobacco filters?

e) Single-use plastic packaging on fruit and vegetables?

13. Do you have any evidence of the impact that policy measures to reduce the consumption of the single-use items set out in Part 2 might have on people with protected characteristics or who experience socio-economic disadvantage of the call for evidence paper:

The purpose of vended provision of food is to cater workers and employees who must work long or unsocial hours. Restrictions on this facility will impact those who buy the 8,300 meals per day provided through vending.

The protected characteristics laid down by the Equality Act 2020 are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

a) Single-use plastic bowls, trays and platters?

b) Single-use plastic period and incontinence products?

c) Single-use plastic sachets?

d) Single-use plastic tobacco filters?

e) Single-use plastic packaging on fruit and vegetables?

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About you

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To find out how we handle your personal data, please see our [privacy policy](#). By clicking submit you agree to our privacy policy.

What is your name?

Name: **David Llewellyn**

What is your email address? **david.llewellyn@the-ava.com**

Entering your email address allows you to return to edit your consultation at any time until you submit it. You will also receive an acknowledgement email when you complete the consultation.

Email(Required) **david.llewellyn@the-ava.com**

Are you responding as an individual or an organisation?

(Required) Individual Organisation

What is your organisation?

If responding on behalf of an organisation, please enter the organisation's name here.

Organisation: **AVA: The Vending & Automated Retail Association**

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

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Publish response with name

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Information for organisations only:

The option '*Publish response only (without name)*' refers only to your name, not your organisation's name. If this option is selected, the organisation name will still be published.

If you choose the option '*Do not publish response*', your organisation name may still be listed as having responded to the consultation in, for example, the analysis report.

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

(Required)

Yes No

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