

# Call for evidence on commonly littered and problematic plastic items

## ***AVA: The Vending & Automated Retail Association*** Response

Introduction

### 1. Would you like your response to be confidential?

(Required)

Yes

**No**

If you answered yes to this question, please give your reason.

### 2. What is your name?

Name: *David Llewellyn*

### 3. What is your email address?

If you enter your email address then you will automatically receive an acknowledgement email when you submit your response.

Email: *David.Llewellyn@the-ava.com*

### 4. It would be helpful for our analysis if you could indicate which of these sectors you most align yourself/your organisation with for the purpose of this consultation (please tick one which is most applicable to you):

- public body
- non-governmental organisation
- retail industry
- manufacturing industry
- member of the general public
- other (please state) *Trade Association*

### 5. If you are responding on behalf of an organisation, what is its name?

Organisation (Required)

*AVA: The Vending & Automated Retail Association*

## **Wet wipes**

*No Response*

## **Tobacco filters**

*No Response*

## **Single-use plastic sachets**

*No Response*

## Single-use cups

The Environment Audit Committee's enquiry into coffee cups found the UK uses 2.5 billion disposable coffee cups per year.<sup>6</sup> As well as having low recycling rates,<sup>[1]</sup> cups frequently end up as litter, causing harm to the environment. Defra's 2020 Litter Composition Analysis, conducted by Keep Britain Tidy, found that 'coffee cups' were the fourth most littered item by volume in England, making up 7.8% of dropped litter volume.<sup>[2]</sup>

In our consultation on Extended Producer Responsibility for Packaging, which ran from 24 March to 4 June 2021, we proposed to introduce a mandatory takeback obligation for single-use disposable cups from 2023. This would require all businesses placing filled disposable cups on the market to provide separate collection of used cups through dedicated collection points, and to arrange for the collection and recycling of these cups. This obligation would require these businesses to accept all disposable cups, irrespective of where the drink was purchased.

Sellers of disposable cups will be responsible for the cost of collecting and recycling disposable cups. It is anticipated that they may join an existing cup recycling scheme or set up their own arrangements for the collection and recycling of disposable cups. The National Cup Recycling Scheme (NCRS), set up and funded by eight major brands,<sup>[3]</sup> already works with waste management companies and reprocessors to collect and recycle cups. 1767 tonnes of disposable cups have been recycled since 2018. A mandatory takeback scheme would also work in conjunction with two other EPR proposals to:

- Obligate producers to report tonnages of fibre-based composites placed on the market as part of their reporting obligations under EPR
- Introduce a recycling target for fibre-based composite packaging including disposable cups

Complementary to our Extended Producer Responsibility proposals, we are now considering the introduction of a charge on single-use cups. A charge would target consumers' behaviour, complementing obligations introduced through EPR, which will target producers. Studies<sup>[4]</sup>,<sup>[5]</sup> indicate that a clear single-use cup charge can have a greater impact than reusable cup discounts on driving uptake of reusable cups, though this could be due to a lack of awareness of discounts.

<sup>[3]</sup> Costa Coffee, McDonald's, Caffè Nero, Pret A Manger, Greggs, Burger King, Pure and Lavazza Professional.

<sup>[4]</sup> Fisher. Signalling change: Studying the effect of price signals on disposable hot beverage cup consumption. Honors thesis. Tufts University, Medford. 2008.

<sup>[5]</sup> Sidhu et al. Single-use items reduction: Disposable cups. UBC Social Ecological Economic Development Studies (SEEDS) Sustainability Program. 2018.

The Environment Act introduces powers in England and Wales to place charges on single-use items, which could be used to introduce a charge in the future. The aim of this charge would be to increase the use of reusable cups, in line with the waste hierarchy. We also want to see a reduction in the numbers of cups that are littered.

### 28. Would you support the government consulting on a proposal to introduce a charge for single-use cups?

- Yes
- No**
- Don't know

Please give reasons and supporting evidence.

*There are three main reasons. The first relates to the number of other pieces of legislation currently under consideration at present.*

*Extended Producer Responsibility is scheduled to be implemented from 2023 and within EPR there is a proposal to direct funds to tackle items most likely to be littered and to modulate fees accordingly. As a result of this policy industry estimate £2.7 billion to be available to address littering and promote recycling.*

*Measures planned already, including a plastic packaging tax, reform of EPR, harmonisation of domestic waste collection, the collection of all plastic packaging and a Deposit Return Scheme, provide a comprehensive suite of measures that will ensure greater resource efficiency and circularity. They should be given time to work through before introducing yet another measure.*

*Indeed, a mandatory take back scheme would be more effective rather than a charge on single use cups in meeting the goals of a significant reduction in numbers of single use cups littered and an increase in number recycled. The voluntary take back scheme for single use paper cups is already proving valuable and should be reinforced. The vending industry has supported cup recycling for more than 20 years and understands the aspects of a scheme that are needed to make it work effectively. The industry started and funded the first take back scheme – Save-a-Cup, currently operated by Options Vending.*

*The second concerns the alternative to a single use cup.*

*Most modern automatic vending machines have sensors so that they will not vend unless a cup is present in the cup station. This cup could be dispensed by the machine or provided by the consumer so there is no technical reason connected to the machine why a reusable cup could not be used and introducing a charge on single use cups might be an encouragement to turn to reusable cups.*

*However, vending is often the sole or main provision of drinks during the working day in factories. Where in a factory would there be facilities to wash a reusable cup? In office environments where there is a kitchen with a dishwasher the job of washing reusable cups is rarely one done willingly. Such cups are usually china. These are relatively fragile and difficult to transport. More robust reusable cups are currently being offered but it has been shown that some with apparently good environmental claims are actually melamine formaldehyde resin with a bamboo fibre filler which leach formaldehyde, a known carcinogen, into the drink. Some cups of this type have been banned in the EU. The replacement of single use with reusable is not straightforward. In universities where they have provided a free reusable mug many consumers still prefer to pay for a single use cup that they do not have to carry around all day.*

*The third reason is cost.*

*The average consumer price of a cup of coffee from a vending machine is 31p in the UK. In addition, many sites provide free coffee to clients or staff; such machines do not have a payment system. The imposition of a charge on the cup would have obvious issues. If the company chose to absorb the cost it would increase the cost of hospitality, and the alternative of a reusable cup would require the installation of cup washing facilities. If the company chose to charge the staff or client this would require the installation of payment systems or a significant increase in the price of the drink with resultant industrial relations implications. For a factory where vending was the main source of drinks during the day, where industry evidence is that people drink from 5 to 7 drinks a day, the increase in cost would be of the order of £1.50 a day or £7.50 a week. In the current financial climate that might well precipitate some industrial unrest.*

**29. Do you think this charge should be for both hot and cold drinks?**

- Yes
- No**
- Don't know

Please give reasons and supporting evidence.

*As per our rationale given in Q28*

**30. Do you think this charge should apply to businesses of all sizes?**

- Yes
- No**
- Don't know

Please give reasons and supporting evidence.

*As per our rationale given in Q28*

**31. Are you aware of any situations where the use of a single-use cup is essential and could be considered for exemptions from the charge in the future? E.g., because of business location, business type, type of product in the cup. Please give reasons and supporting evidence.**

*The AVA believes that single use is essential in settings where alternatives might pose a risk or have higher environmental impacts. Examples include in medical settings, prisons and aviation and train travel.*

*We also consider that single use cups served in closed loop vending locations should be excluded from the proposal. Single use cups served in these locations are disposed of at the point of service; they can be collected, consolidated and returned for recycling. There is sufficient recycling resource within the UK to recycle all the paper single use cups served through vending machines and facilities are under development for the reprocessing of polystyrene. These single use cups do not contribute to or cause littering issues in the wider environment.*

## **Additional items**

We are interested in seeking your views on future targeted action. Please provide evidence in support of your response, including the environmental impact of these items.

**32. Please state any further single-use plastic items that you think should be considered for targeted future policy actions, and your reasons for this.**

**33. Regarding any additional items that you have provided, are you aware of any environmentally friendly Alternatives that could be used instead?**

*Current single use cups can be made from fossil or renewable sources. There are schemes collecting both paper and polystyrene cups in the UK. Efforts need to be concentrated on maximising the recycling of the existing cups rather than inventing new materials. The issues with recycling arise at the MRF where cups make up such a small proportion of the recycled material that they are rejected rather than separated into different types. This is the reason why specific recycling streams have been such a success and should be encouraged. Contrary to some reports there is currently no single use paper cup that can be recycled along with normal paper but all paper cups can be recycled through the national scheme. There is ample capacity for these cups, the fibre of which is in demand. The recycling of polystyrene cups is less developed but is nevertheless effective and the recyclate is valuable.*

## Re-use and Refill

In line with the waste hierarchy (priority goes to preventing the creation of waste, followed by preparing waste for reuse; to recycling, and then recovery, with disposal regarded as the worst option), we would like to see a shift away from single-use items to reusable or refillable Alternatives. Therefore, in this section, we are scoping out views on how this could be achieved.

### **34. What are the barriers to reuse and how could they be addressed? Please provide any supporting evidence.**

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*There is also the issue of hygiene with regard to reusable cups. In many sites there may not be adequate facilities to ensure that reusable cups/mugs are cleaned correctly. Plus the issue of liability in the event that a contaminated cup is used – either causing injury to the consumer or contamination of the dispense equipment – who is liable? This would be unclear under current legislation.*

### **35. What are the barriers to refill and how could they be addressed? Please provide any supporting evidence.**

*Response as Question 34.*

### **36. How can government incentivise increased reuse and refill?**

### **37. How could businesses incentivise customers to support reuse and refill?**

### **38. Please provide information about any successful case studies of reuse and refill.**

### **39. Would you support the government consulting on regulating that restaurants cannot provide customers with any single-use products in eat-in settings? The existing exemption for straws would remain.**

- Yes
- No**
- Don't know