PE1636/D

Keep Scotland Beautiful submission of 28 April 2017

1. Introduction

Keep Scotland Beautiful

Keep Scotland Beautiful is the Scottish charity that campaigns, acts and educates on a range of local, national and global issues to change behaviour and improve the quality of people's lives and the places they care for.

Having been part of the environmental landscape for over 50 years, we draw together government, local authorities, businesses, community groups and individuals in this common cause. We are present in every village, town, and city, and our activities are estimated to make a difference to 1 in 5 people living in Scotland.

This makes us uniquely placed in Scotland to work across sectors to address the environmental damage caused by littered items in our environment.

Consideration of petition PE1636

Calling on the Scottish Parliament to urge the Scottish Government to introduce legislation requiring that all single use drink cups (including all sleeves, labels & lids) be 100% biodegradable.

The Public Petitions Committee considered the above petition at its meeting on the 30 March 2017 and invited Keep Scotland Beautiful to provide its views on the action called for in the petition, and outline what action it is taking to address the issue raised by the petition.

We are pleased to have the opportunity to provide this written submission to the Public Petitions Committee.

2. General Comments

The problem

Keep Scotland Beautiful is aware of the challenge posed by the waste generated from single use cups, and the impact that this is having on the environment.

It is estimated that 2.5 billion single use cups are being used in the UK every year, equating to almost seven million cups per day and creating approximately 25,000 tonnes of waste per year. Approximately 1 in 400 single use cups are recycled.

Zero Waste Scotland estimates that 208 million single use cups are thrown away in Scotland every year¹. Drinks related litter is one of the most visible types of litter in our environment. In the national audit of litter in Scotland 2016/17², drinks related litter was present in 38% of sites surveyed (increase of six per cent from 2015/16) and present on 70% of roadsides (principally A roads).

Research, undertaken on behalf of Keep Scotland Beautiful by YouGov, shows that members of the public are concerned about this type of litter in the environment.

When asked about the types of litter they noticed most in their community, 55% of Scottish adults said that drinks containers were one of the items that they noticed most³.

¹Zero Waste Scotland (website), http://www.zerowastescotland.org.uk/content/packaging-ewwr.

² Keep Scotland Beautiful, Local Environmental Audit and Management System data, 2015-2017.

³ YouGov on behalf of Keep Scotland Beautiful, *Litter in Scotland*, 2015-2017.

When asked about the types of litter they noticed most on roadsides, 68% of Scottish adults said drinks containers were one of the items that they noticed most⁴.

Action taken by Keep Scotland Beautiful

Keep Scotland Beautiful has assembled a national coalition for action from a broad range of stakeholders from across the public, private and third sector, which aims to challenge society's relationship with waste and litter.

Our work goes further than just cleaning up. We are working to increase awareness and understanding of waste generation and litter prevention, to change long-term attitudes and behaviours towards these issues.

Listed below are some examples of the programmes, projects and campaigns we are leading, delivering and supporting.

a) Clean Up Scotland campaign

Across Scotland we continue to develop and support local groups and organisations by providing Clean Up kits, posters, and other materials to help spread the message that a litter free environment is beneficial for well-being, community spirit and environmental sustainability. Our Clean Up Scotland campaign has supported over 580,000 participants to remove over 5,500 tonnes of litter from Scotland's environment. We also support communities who have cleaned up to introduce preventative measures and campaign locally to encourage behavior change.

b) Roadside Litter campaign

A number of industry partners are currently collaborating with us to run a roadside litter campaign. Although it is too early to provide figures regarding the reduction in littered items, the campaign has been strategically successful in bringing together national and local government, the road operating companies and a national charity to act in coalition.

c) Clean Europe Network

Our Chief Executive, is president of the Clean Europe Network. The Network is a pan-European platform where organisations in the field of litter prevention share experience, expertise, best practice and research with a view to improving litter prevention across the European Union.

d) Neat Streets

Neat Streets was our innovative anti-littering campaign, based in the Grassmarket in Edinburgh, and which ran through 2016. The purpose of the campaign was to decrease litter using a variety of behaviour change methods, from promoting civic pride in the Grassmarket to offering easier and interesting ways for people to responsibly dispose of their rubbish.

Neat Streets was a result of a collaboration between us, Hubbub (a charity which explores innovative ways to interest consumers in important sustainability issues), The City of Edinburgh Council, local residents and shopkeepers from the Greater Grassmarket Business Improvement District (BID) area.

The campaign generated results which we are using to build new and innovative ways of encouraging the public to dispose of their rubbish responsibly, and more broadly, change behaviour and attitudes towards litter.

e) Simply Cups

We are an official supporter of the Simply Cups scheme which is the only UK collection and recycling scheme that turns paper and plastic cups into second-life materials.

3. Specific comments

Are 100% biodegradable cups the answer to the problem?

Keep Scotland Beautiful acknowledges that requiring all single use drinks containers (including all sleeves, labels & lids) to be 100% biodegradable may have the potential to reduce the overall volume of plastic in the waste system, and help to combat some of the difficulties associated with recycling this type of item.

However, although this suggestion is initially attractive, we believe that the introduction of legislation requiring that all single use drinks cups be 100% biodegradable is not the most effective way to ensure a reduction in the number of single use cups thrown away in Scotland each year, or make a tangible difference to a reduction in the levels of litter caused by this item.

The majority of single use cups are used on-the-go, away from the place of purchase. As a result, people tend to use general waste bins or litter their used cups. We believe that simply making a cup 100% biodegradable will not directly translate into the cup being disposed of responsibly.

There are several cup options available which claim to be completely biodegradable. It is also worth noting that the terms biodegradable and compostable are often used interchangeably but do not necessarily mean the same thing. As the majority of biodegradable cups would be used on-the-go, disposal of them would often be limited to general waste bins, resulting in landfill where conditions are not ideal for biodegradation.

With regards to compostable cups, there may be an issue in ensuring that they are captured with other compostable waste. We acknowledge the role of compostable cups in the marketplace, but recognise that they require a dedicated collection infrastructure, and joined up approach across the supply chain to ensure their collection is maximised and that they do not contaminate dry recycling schemes.

A recyclable alternative to the polyethylene coated paper cup is more expensive and, more importantly, does not change 'single use' behaviour or address the impact of cups as littered items. Indeed, it may add to the litter problem as those who currently litter food waste as it is biodegradable, may also apply this logic to a biodegradable cup.

A biodegradable cup may present individuals with a 'license to throw'. As this type of cup is only technically biodegradable, rather than naturally biodegradable, a cup can take up to five years to biodegrade depending on the conditions⁵.

We recognise that harnessing effective national infrastructure and services for paper cup collection and processing are important. We are supportive of the efforts being made across the UK that are currently being undertaken in order to make improvements to both recycling technology and programmes for the collection of cups for recycling.

The Paper Cup Recycling and Recovery Group's (PCRRG) Paper cup manifesto is a positive example of industry taking voluntary collective action, and represents a visible willingness to collaborate. Our Chief Executive chairs the PCRRG litter working group which allows us to encourage and support members to develop practical action to tackle the negative impact that single use drinks cups have on the environment.

⁵ http://classroom.synonym.com/long-do-paper-plates-decompose-6816617.html.

The coffee cup supply chain, including members of PCRRG are also actively supporting the Square Mile Challenge⁶, which launched in London's Square Mile on 3 April 2017.

From a strategic perspective, there is a risk that the continued promotion of a recycling message, instead of prioritising reuse, will be unlikely to result in a reduction in the use of disposable products.

To prevent waste and litter, Keep Scotland Beautiful believes that a key factor in securing a reduction in the number of single use drinks containers will be a focus on promoting reusable cups.

What is the answer to this problem?

In our view, a reduction in single use cup waste can only be effectively addressed by putting in place an integrated approach that deploys a wide range of interventions from government, local authorities and the private sector that focus on behaviour change.

Recent research⁷ has suggested that a combination of financial incentives, availability of reusable cups and clear, sustained messaging is likely to lead to a reduction in this type of waste.

In particular, incentives that aim to encourage the reuse of alternatives to single use cups present a real opportunity to change consumer behaviour. If reusable cups are well designed to ensure they are affordable, efficient and desirable, and they are promoted through a sustained national campaign we believe the take up could be substantial.

Furthermore, we believe that, in combination with other interventions, a small charge, tax or levy on the use of single use cups has the potential to influence consumer behaviour. The risk of introducing a fee in isolation is that, with no other alternative, the fee will be paid and waste will continue to be produced. However, in the same way as consumers can avoid the single use carrier bag charge by bringing reusable bags, the availability of reusable cups in conjunction with a fee could help to make a significant contribution.

While recognising that tackling drinks related litter needs to be placed in the context of a broader collective effort to tackle litter and littering behaviour, we know that it is on-the-go consumption by individuals that leads to the majority of this type of litter on the ground.

We believe a sustained campaign targeting individuals, with financial and infrastructure enhancements is likely to be much more effective than legislation to introduce biodegradable cups. A significant impact can be achieved is this is issues can be made through the encouragement of collective, bottom up consumer action towards reduction and reuse.

4. Conclusion

Keep Scotland Beautiful is pleased to have provided this written submission to the Public Petitions Committee.

We would be happy to engage further with the Committee if required on this issue or answer any questions arising from our response.

We would also be willing to provide evidence formally to the Public Petitions Committee on this matter if that was something the Committee would felt would be helpful.

⁶ http://www.squaremilechallenge.co.uk.

⁷ Cardiff University on behalf of Bewley's, *Results of a field experiment to reduce coffee cup waste,* 2016.