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Welsh Government consultation - Reducing single use plastics BMA Cymru Wales response

INTRODUCTION

BMA Cymru Wales is pleased to provide a response to the consultation by the Welsh Government on reducing single use plastics in Wales.

The BMA is a professional association and trade union representing and negotiating on behalf of all doctors and medical students in the UK. It is a leading voice advocating for outstanding health care and a healthy population. It is an association providing members with excellent individual services and support throughout their lives.

It is widely recognised that we are facing a climate emergency, which will have a significant impact on health and further exacerbate poverty and inequality. All too aware of the health-related impacts, BMA members declared a climate emergency at the Association's annual policy-making conference in 2019ⁱ. The widespread use of single use plastics across the globe is a major contributory factor toward climate changeⁱⁱ.

Reducing the use of plastics is established BMA policy. For instance, the following motion was passed at the Public Health Medicine conference in 2018:

That this conference recognises the harm to health arising from plastic pollution, and calls on government to introduce an evidence-based way of radically reducing its prevalence in the environment.

Cyfarwyddwr Cenedlaethol (Cymru)/National director (Wales):

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Listed as a Trade Union under the Trade Union and Labour Relations Act 1974.



We therefore are pleased to see the Welsh Government taking action in this key area, and broadly endorse the aims outlined in the consultation.

RESPONSE

- 1. Do you support our proposal to ban each of the single use plastic items listed below? If not, please give reasons and where possible evidence to support this view.*

We would support the proposal to ban each of the 9 items listed. Regarding item 2 (single use plates), we would welcome clarification as to whether this includes the plastic trays used to package fruit, vegetable and meats in supermarkets.

In general, we would make the suggestion that the proposals would carry more weight and gain public understanding if widely available alternatives to each item were listed. For instance, regarding item 2 and its potential use in supermarkets, it would be useful to advocate for more sustainable alternatives such as compressed paper trays. Such alternatives should be tested and examined for any impacts (positive or negative) as part of any impact assessment for new legislation.

- 2. Do you agree the potential environmental and social benefits of our proposals outweigh the potential impacts on people in Wales? Please give reasons and where possible evidence to support this view.*

Whilst we are wary of the short term unintended negative effects of bans, the use of single use plastics is unsustainable and damaging to planetary and human health in the medium to long term. We would anticipate that the cumulative effects for future generations of making Wales more sustainable will offset any adverse effects on the current population.

- 3. Do you agree with our assessment of the potential benefits and impacts our proposals will have on businesses, including manufacturing, in Wales? Please give reasons and where possible evidence to support this view.*

If Welsh industry were able to respond positively to this policy shift, then it would be reasonable to assume that they may reap some benefits in the short to medium term. We know from several briefings and meetings convened as part of NHS Wales' COVID-19 response that certain parts of Welsh industry were able to adapt extremely quickly toward the production of some items of PPE, as part of the aspiration to be more self-sustainable in this area.

- 4. Should oxo-degradable plastics be included on the list of items to be banned? Please provide evidence to support this view.*

The aim of the Oxo-degradable plastic production process is to deliberately create micro-particles of polymer rather than individual small molecules. These larger particles are virtually impossible to remove from the environment and are of particular concern

once ingested by soil and aquatic organisms. We would therefore agree with their inclusion within the list.

It has been brought to our attention that the company OXO produces reusable utensils aimed at those with limited manual dexterity, and would urge clarity when referring to the banning of oxo-degradable products to avoid such beneficial goods from being damaged by association.

- 5.** *Do you believe the COVID-19 pandemic has resulted in changes to the market that are currently not accounted for in our research? Please give reasons and where possible evidence to support this view.*

The introduction highlights the increased use of personal protective equipment in health and care settings during the COVID-19 pandemic. Much of this material is single or sessional use, some of which can be sterilised adequately with some for disposal. The continued prevalence of COVID-19 in communities and concern regarding nosocomial transmission means that PPE use will remain at current levels for some time. It is therefore entirely appropriate that exemption applies to PPE for the protection of health and care staff.

Undoubtedly COVID-19 has led to ‘*a sudden shift in the hierarchisation of values*’ amongst the public where concerns regarding the health threat of the virus have ‘*clearly outgrown the perceived threat of plastic pollution*’ⁱⁱⁱ. Outside of health and care settings, we are witnessing a significant increase in the use of disposable visors and masks by the public, as a result of COVID-19 guidance requiring the use of face coverings in indoor public spaces including public transport and shops. Whilst most official guidance^{iv} advocates for the use of reusable and washable fabric face coverings, it is evident that a disposable single-use masks and even medical grade PPE are popular amongst the public. The BMA has previously called for medical grade masks to be limited to use only by the over 60s and those with underlying medical conditions in areas where face coverings are required. This is to protect the supply of PPE for healthcare workers and to minimise the environmental impact of disposable medical equipment. Whilst we advocate for universal mask use to prevent secondary transmission and therefore would suggest that disposable masks are better than no masks at all, wider consideration should be given to how their impact could be minimised whilst ensuring maximum take-up of reusable face coverings.

- 6.** *Do you agree with the exemptions we are proposing and how we make them as clear and practicable as possible to apply? Please give reasons and where possible evidence to support this view.*

The exemptions described in the document are entirely reasonable and proportionate for health and care settings. Supply of exempted items such as plastic straws could be accommodated via registered/licensed suppliers for certain groups, akin to systems such as the ACBS scheme via prescribing pharmacies.

Special consideration in particular would be needed for secure healthcare settings: for example, administration of certain liquid-based drugs and the use of disposable plastic

cutlery in prisons for safety reasons. While alternative systems can be put into place, these are often more costly or administratively difficult, and therefore we would not expect an immediate transition to the use of non-plastic alternatives.

7. *Are there other exemptions we should consider in relation to all of the single use plastic items in our proposal? Please provide as much detail as you can.*

There are no further exemptions we would propose.

8. *Do you agree the proposed timescale for the implementation of the bans provides sufficient time for businesses of all types to adapt? Please give reasons and where possible evidence to support this view.*

Subject to an impact assessment regarding readily available alternatives to the banned items being conducted and production of sector-specific guidance, the timescale of 6 months would be sufficient.

9. *Do you agree with the use of Civil Sanctions?*

The use of Civil sanctions would be appropriate and in-keeping with other interventions made in Wales. Clear guidance should be set out how repeat offenders could be pursued under criminal sanctions.

10. *Do you agree that Local Authorities should enforce the ban?*

We agree that Local Authorities should have the enforcement function, given the fact they have similar existing responsibilities around waste management and other sectors. However, we would question whether all authorities in Wales have sufficient staff coverage to accommodate this additional role, particularly those with a sparse population density. The new duties should be accompanied by adequate funding and provision of staff training.

11. *Should wet wipes be included in future proposals for further bans or are there other measures which could be introduced to address them, for example Extended Producer Responsibility? Please give reasons and where possible evidence to support this view.*

We would support any proposals that would reduce the vast amount of non-degradable cleaning wipes that are currently used and then inappropriately disposed-of, with a consequential damaging effect on the public purse. COVID-19 has rightly made people ever more conscious of hand and surface hygiene; however, this does not need to be done using single-use cleaning wipes when reusable, washable cloths with appropriate detergent and/or disinfectants will suffice.

While it may be difficult from a public perception point of view to bring forward a ban during these hygiene-conscious times, a system of producer liability for the damaging effects of these items should be explored. It has been estimated by Dŵr Cymru Welsh Water that inappropriately disposed-of wet wipes account for around 2,000 sewer blockages in Wales.^v

12. *Are there any other items that should be included in any future policy proposals to tackle single use plastics? Please give reasons and where possible evidence to support this view.*

This is not a definitive list of suggested items to explore in future policy proposals, and research and consultation would be needed across sectors. Items we suggest that are considered under future proposals include:

- Single-use items in healthcare: a sector wide study should be undertaken on the increasing use of single use items across the NHS, which is largely a consequence of fears around prion disease. This study should explore whether alternatives can be used while preserving infection control measures, which are of course paramount during a global pandemic. This should incorporate the views of infection control experts and those who use such implements most often in daily practice.
- Plastic food wrapping: typically used by supermarkets and not currently recyclable in most areas. These could be discouraged through a similar charge as for plastic carrier bags.
- Laminated paper (as used in sandwich packaging and paper cups): this type of paper is extensively used in the food retail sector, and misleadingly labelled as 'recyclable' when in fact local authorities do not have the facility to process them in Wales. Schemes to favour reusable coffee cups were introduced in recent years but seem to have been discouraged due to COVID-19 infection precautions.
- Single use non-reusable bottles: Suppliers and retailers should consider a deposit on refund scheme for all liquid containers

ⁱ BMJ 2019;365:l4445 'Doctors declare climate emergency and call for tighter targets' www.bmj.com/content/365/bmj.l4445

ⁱⁱ Center for International Environmental Law (May 2019) 'Plastic & Climate: The Hidden costs of a plastic planet' www.ciel.org/plasticandclimate/

ⁱⁱⁱ Silva, A.L, and Prata, J.C et al (17 August 2020) 'Increased plastic pollution due to COVID-19 pandemic: Challenges and recommendations' Chem Eng J. 2021 Feb 1; 405: 126683 www.ncbi.nlm.nih.gov/pmc/articles/PMC7430241/

^{iv} Welsh Government (September 2020) 'Face coverings: guidance for public' gov.wales/face-coverings-guidance-public#section-43650

^v National Assembly for Wales Climate Change, Environment and Rural Affairs Committee (June 2019) 'Report on policies and proposals relating to plastic pollution and packaging waste' senedd.wales/laid%20documents/cr-ld12549/cr-ld12549-e.pdf