

UK Plan for Waste Shipments Wildlife and Countryside Link response

March 2021

Wildlife and Countryside Link (Link) is the largest environment and wildlife coalition in England, bringing together 57 organisations to use their strong joint voice for the protection of nature. Our members campaign to conserve, enhance and access our landscapes, animals, plants, habitats, rivers and seas. Together we have the support of over eight million people in the UK and directly protect over 750,000 hectares of land and 800 miles of coastline. This response is supported by the following Link member organisations:

- Environmental Investigation Agency
- Friends of the Earth
- Greenpeace
- Marine Conservation Society
- Surfers Against Sewage
- Whale and Dolphin Conservation
- WWF-UK

Consultation response

1. **What are your views on the proposal to update the UK Plan to make it consistent with existing government policy which allows the repatriation of UK-generated NORM waste and specifies criteria for other shipments of NORM waste?**

NORM waste is not an area of expertise of the Wildlife and Countryside Link Waste and Resources Group.

We would, however, urge the government to consult with other organisations with expertise on this topic, including the International Pollutants Elimination Network (IPEN).

2. **Do you have any comments on the proposal to require that any interim disposal operations on wastes being exported for disposal should be carried out in the UK, where there is capacity?**

To the extent that there is any exception to the prohibition of shipments of waste for disposal to and from the UK, we welcome the decision to require any interim disposal operations be carried out in the UK. This measure should also facilitate the monitoring and tracking of waste and incentivise domestic waste management.

We do, however, urge the government to:

- I. take note that these measures are contingent on the UK having the capacity to do so and, as a result, where necessary, accompanying measures should be promoted to ensure sufficient capacity to carry out all interim disposal operations in the UK. Moreover, we encourage the government to further clarify how it defines 'capacity' and what roles demand and responsibility have with regards to ensuring the UK takes responsibility for its waste.
- II. clearly outline how the UK will ensure environmentally sound management to fulfil obligations under international law.
- III. commit to not increasing UK incineration or landfill without adequate pretreatment as a result of adopting and implementing this proposal and in alignment with the Paris climate commitments.
- IV. apply narrow definitions of and subsequently practice the principles of self-sufficiency and proximity for any waste generated and treated by the UK, including interim and final operations for both disposal and recovery.

3. Do you agree with the proposal to remove the exception which currently allows the export of contaminated river sediments for disposal?

Contaminated river sediment is not an area of expertise of the Wildlife and Countryside Link, and we encourage the government to consult with civil society groups with expertise in this field. However, in this instance, we would permit ourselves to agree with the removal of this exception, given that any export of contaminated materials/ wastes often generates additional environmental and human health burdens outside of the country where it originated. In addition to the fact that this exception has never been used, and that there are UK facilities to manage this waste.

4. What are your views on the introduction of a specific exception which will allow the export of mercury waste and mercury-contaminated wastes for disposal?

Mercury-contaminated waste is not an area of expertise of the Wildlife and Countryside Link Waste and Resources Group.

We would, however, urge the government to consult with other organisations, including the International Pollutants Elimination Network (IPEN) on this issue.

5. We have made amendments to the UK Plan to reflect the UK's departure from the European Union and the end of the transition period. Do you have any views on these amendments?

We either agree with or have no current views on the amendments currently made to the UK Plan.

6. We have made minor technical amendments throughout the UK Plan for example to update contact details and the list of overseas territories. Do you have any concerns regarding these minor technical amendments?

We have no concerns with regards to the amendments made throughout the UK Plan to update contact details and the list of overseas territories. We suggest that it may be helpful to also include a contact list for overseas territories and crown dependencies referred to within the UK Plan.

7. Are there any other matters covered by the UK Plan that you would like us to consider?

Due to the urgency with which measures are needed to curb significant harm, our response to this question focuses on plastic waste exports.

The UK is the world's second largest producer of plastic waste (99kg per person per year) and in 2020 exported around 537,000 metric tonnes - equivalent of 51% of our packaging waste^{1,2}. We are producing and consuming quantities of plastic beyond what can be dealt with at a domestic level, and the waste management sector has become structurally dependent on exporting plastic waste at scale to poorer countries with less stringent regulation that do not have the capacity to manage it in a socially and environmentally responsible manner. The top three countries for UK waste exports are, for example, Turkey (39%), Malaysia (12%) and Poland (7%); all three countries have exceedingly high mismanagement rates, with up to 90% sent to landfill³.

A perfectly managed and transparent waste trade system could, in theory, align supply and capacity and lead us to a circular economy. However, the reality on the ground underscores that this is not possible due to chronic plastic waste leakage and mismanagement in receiving countries and uneven economic playing fields around the world which are readily exploited by a multiplicity of actors, including organised criminals, corrupt officials, and unscrupulous traders⁴.

The UK Plan for Shipments of Waste for Disposal, which "*implements the long-standing UK policy of self-sufficiency in the disposal of waste by strictly limiting when waste may be shipped to or from the UK for disposal*"⁵, provides an opportunity to reflect upon the trade in plastic waste more broadly and consider the fundamental drivers behind the issue in ambitious pursuit of a safe and circular plastics economy - one that is just and safeguards the climate system.

To do so, we recommend the adoption of the following measures:

i. Ban all plastic waste exports outside of the UK

¹ Law, K. L., Starr, N., Siegler, T. R., Jambeck, J. R., Mallos, N. J., & Leonard, G. H. (2020). The United States' contribution of plastic waste to land and ocean. *Science advances*, 6(44). Available at:

<https://advances.sciencemag.org/content/advances/6/44/eabd0288.full.pdf> and Circular, February 2021. 'Enormous' increase in UK plastic waste exports to Turkey and Malaysia – Greenpeace. Available at: <https://www.circularonline.co.uk/news/enormous-increase-in-uk-plastic-waste-exports-to-turkey-and-malaysia-greenpeace/>

² From January to December 2020 1,051,836 metric tonnes of plastic packaging waste was either accepted or exported. Environment Agency. National packaging waste database (NPWDB), accessed February 2021, Available at: <https://npwd.environment-agency.gov.uk/Public/PublicSummaryData.aspx>

³ OECD (2019). Turkey Highlights 2019, p.5. OECD Environmental Performance Reviews. Available at: <http://www.oecd.org/env/country-reviews/Highlights-Turkey-2019-ENGLISH-WEB.pdf>

⁴ INTERPOL (2020). Strategic Analysis Report: Emerging Criminal Trends in the Global Plastic Waste Market Since January 2018. Available at: https://webcache.googleusercontent.com/search?q=cache:fHdYnRQPHYwJ:https://www.interpol.int/content/download/15587/file/INTERPOL%2520Report%2520_criminal%2520trends-plastic%2520waste.pdf+%&cd=1&hl=en&ct=clnk&gl=uk

⁵ Waste Management Plan for England, January 2021. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/955897/waste-management-plan-for-england-2021.pdf

The UK committed to ban the export of plastic waste to non-OECD countries in 2019, and repeatedly pledged to uphold environmental standards post-Brexit⁶. Yet, after transposing the Basel amendments, the UK is still allowing contaminated and difficult-to-recycle plastic waste to be exported to non-OECD countries. Despite clear recognition of harm and mismanagement, these shipments are still being permitted under the new rules. Yet even if the government were to follow through on this commitment, 79% of UK waste currently goes to countries that are in the OECD (such as Turkey) that would not be affected by the proposed ban⁷. The UK have so far failed to follow the EU's lead in banning exports to non-OECD countries, but still have the opportunity to match and even exceed EU ambition as part of upcoming legislative revisions.

Parties to the Basel Convention are required to employ the Proximity Principle, whereby waste should be managed as close as possible to the point of generation. Although plastic waste trade is sometimes considered as contributing to a circular economy, it doesn't fulfil that purpose, but rather acts as a means to externalise the true costs of proper waste management to weaker economies and encourages substandard treatment – something that a true circular economy must never do. The UK would only fulfil its obligations by phasing out all plastic waste exports, starting immediately with a ban to non-OECD countries followed by a phase-out of plastic waste exports outside the UK. To the extent any exceptions are provided, those should be limited to exceptional circumstances and subject to robust controls to ensure environmentally sound management..

ii. Incorporate, outline and ensure alignment of all waste shipment recovery and disposal operations to and from the UK and associated procedures in the UK Plan

Recognising that Regulation 11 of the Transfrontier Shipment of Waste Regulations 2007⁸ only requires a waste management plan for waste shipments for disposal, we believe there is a need to clearly outline the controls and procedures for recovery operations, as well as the steps taken to reduce the transboundary movement of 'other' wastes. This would include those outlined for the import and export of waste under Article 18 controls, including plastic waste⁹ in line with the objectives of Article 4(2) (d) of the Basel Convention¹⁰.

This will also provide an opportunity for the government to demonstrate how they are ensuring a reduction in the transboundary movement of hazardous and other wastes through objectives outlined in the UK's Circular Economy Package (CEP), Waste & Resources Strategy for England, and

⁶ The Conservative and Unionist Party (2019). Get Brexit Done: Unleash Britain's Potential. The Conservative and Unionist Party Manifesto, p.43. Available at: https://assets-global.website-files.com/5da42e2cae7ebd3f8bde353c/5dda924905da587992a064ba_Conservative%202019%20Manifesto.pdf

⁷ ENDS Report, February 2021. MAPPED: The UK's plastic waste exports. Available at: https://webcache.googleusercontent.com/search?q=cache:ZbjlMKxeP_sj:https://www.endsreport.com/article/1707873/mapped-uks-plastic-waste-exports+&cd=1&hl=en&ct=clnk&gl=uk

⁸ "Waste management plan 11. The Secretary of State must prepare a waste management plan in accordance with Article 7 of Directive 2006/12/EC of the European Parliament and of the Council on waste(1) containing his policies on the bringing into, or dispatch from, the United Kingdom of waste for disposal" - The Transfrontier Shipment of Waste Regulations 2007. Available at: <https://www.legislation.gov.uk/ukSI/2007/1711/regulation/11/made>

⁹ Examples include Guidance on importing and exporting waste plastic. Available at: <https://www.gov.uk/guidance/importing-and-exporting-waste-plastic>, Guidance on import or export: Article 18 controls. Available at: <https://www.gov.uk/guidance/importing-and-exporting-waste#import-or-export-article-18-controls> and Guidance on plastic waste categories. Available at: <https://www.gov.uk/government/publications/waste-shipments-regulation-wsr-consolidated-waste-list/consolidated-waste-list#b3-wastes-containing-principally-organic-constituents-which-may-contain-metals-and-inorganic-materials>

¹⁰ As mentioned in New Regulation 11A in The International Waste Shipments (Amendment) (EU Exit) Regulations 2019, Available at: <https://www.legislation.gov.uk/ukSI/2019/9780111178539> and Articles 28(2) and 28(3)(a) of Directive 2008/98/EC of the European Parliament and of the Council (given Directive 2006/12/EC was repealed by Directive 2008/98/EC). Available at: <https://www.legislation.gov.uk/eudr/2008/98/contents>

the 25 Year Environment Plan in addition to the anticipated ban and prohibition on the export of UK plastic waste to non-OECD countries.

This would, for instance, include outlining the application of prior informed (written) consent and tacit consent within the relevant regulations cited within the UK Plan for all shipments of waste, and a list of all waste codes and their corresponding control procedures. Furthermore, we recommend that the Plan provide further clarity on how the UK defines 'hazardous waste' and how this intersects with export codes and control procedures.

iii. Ambitious Reforms to the Packaging Producer Responsibility Scheme (PRN/PERN system)

DEFRA, the Environment Agency and other devolved administrative bodies with authority over the Packaging Export Recovery Note (PERN)/Packaging Recovery Note (PRN) system have little to no direct visibility of the output of packaging and recycling that takes place outside the UK. They assume that recycling output for waste for recovery exported abroad is at 100%¹¹, effectively incentivising low-quality exports. Even if a UK facility's generated recovery rate was 90% (which is considered very good), there is still a 10% financial disadvantage compared to facilities where waste is exported for recovery, where rates of recovery are all assumed to be 100%. Of the limited data available, recovery efficiencies at facilities in developing countries can be as low as 30%¹².

To create a level playing field within the recycling industry in a manner that incentivises domestic recycling (a key objective outlined within the government's Resources and Waste Strategy for England), we suggest that evidence-based default values with low assumptions on recovery performance are used to calculate material recovery rates overseas unless reliable, documented evidence is supplied to demonstrate higher performance. Not only would this level the playing field, but exported waste flows would be directed to high-performing and controlled recycling markets where higher performance is demonstrated in addition to providing demand and increasing investment opportunities within UK recycling infrastructure (assuming that UK recycling objectives are met in tandem). Furthermore, sale of PRNs and PERNs typically only cover 10% of the total cost of dealing with the waste¹³ Low compliance costs undermine the purpose of the system and costs fail to encourage businesses to engage with the recycling sector. There is the opportunity, presented by proposed reforms to EPR, to incentivise recovery and reprocessing of waste within the UK versus exporting waste for treatment. This can be done through modulated fees whereby PERNs are priced at a much higher rate than domestic PRNs.

iv. Establish a clear distinction between mechanical recycling and any other kind of recovery for treatment operations

The Waste (England and Wales) Regulations 2011 establishes a clear preference for mechanical recycling over incineration with energy recovery or other kinds of recovery. However, within the UK Plan for Shipments of Waste and corresponding legislation (Transfrontier Shipment of Waste Regulations 2007), there is no such distinction. As the majority of plastic waste incineration happening in Europe is classified as energy recovery (R1 operations), whose processes don't preserve the material value as well as resulting in CO₂ and toxic emissions, a clear preference,

¹¹ Lets Recycle, July 2019. Levelling the playing field in plastics recycling. Available at:

<https://www.letsrecycle.com/news/latest-news/levelling-the-playing-field-in-plastics-recycling/>

¹² Bishop, G., Styles, D., & Lens, P. N. (2020). Recycling of European plastic is a pathway for plastic debris in the ocean. Environment International, 142, 105893. Available at:

<https://www.sciencedirect.com/science/article/pii/S0160412020318481#>

¹³ Policy Connect. Plastic Packaging Plan: achieving zero 'waste' exports, February 2019. Available at:

<https://www.policyconnect.org.uk/research/plastic-packaging-plan-achieving-zero-waste-exports>

consistent with the UK's established waste management hierarchy should be made between the two operations¹⁴.

v. Set a UK-wide threshold for waste contamination of 0.5%

The UK guidelines for the UK transposition of Basel Convention plastic amendments¹⁵ fail to outline a clear contamination limit for B3011 shipments. Such limits are essential to ensure environmentally and socially responsible recycling that drives circularity. However, contamination in UK plastic waste destined for recycling is significant and needs to be addressed, for instance:

- A 2013 study in Scotland found that typical levels of plastic contamination in dry municipal recyclate had an arithmetic mean of 5.5% and business recyclate an arithmetic mean of 7.1%¹⁶.
- It was estimated that in 2018 UK councils had to send almost 500,000 tonnes of contaminated recycling to landfill or incinerators¹⁷. Over 467,000 tonnes of household recycling in England alone was reportedly rejected from recycling plants in 2017¹⁸ (representing less than 5% of all recycled waste, but in some areas this was significantly higher). For instance, a recent spot check conducted by Redditch borough council found that 23% of kerbside recycling collections were contaminated¹⁹.

Both China²⁰ and Hong-Kong²¹ recently adopted a 0.5% contamination threshold for non-hazardous contaminants in plastic waste imports in order to implement the “almost free from contamination” language used in the Basel Convention. Meanwhile, hazardous contaminants will likely need to be controlled at much lower thresholds in line with the definitions of hazardous plastic waste. The objective for adopting such thresholds is to increase the quality of recycling and lower the risk from mismanagement of contaminants and recycling rejects. Although this threshold can appear as challenging in the first place, it is in line with the Basel language “almost free from contamination.” Further, it provides the right incentive for much needed action to move recycling upwards in the waste hierarchy through better waste collection and sorting systems.

vi. Institute a moratorium on new incineration capacity within the UK

¹⁴ Rethink Plastic Alliance, January 2021. Waste Shipment Regulation revision How to fix Europe's plastic waste trade issues. Available at: https://rethinkplasticalliance.eu/wp-content/uploads/2021/01/rpa_waste_shipment_regulation_recommendations.pdf

¹⁵ GOV UK. Guidance Importing and exporting waste plastic, December 2020. Available at: <https://www.gov.uk/guidance/importing-and-exporting-waste-plastic>

¹⁶ Zero Waste Scotland. Contamination in source-separated municipal and business recyclate in the UK 2013, March 2014. Available at: <https://www.zerowastescotland.org.uk/sites/default/files/Contamination%20in%20source-separated%20municipal%20and%20business%20recyclate%20in%20the%20UK%20report.pdf>

¹⁷ Evening Standard. Waste recycling: UK councils had to dump 500,000 tonnes of contaminated recycling in landfill last year, March 2019. Available at: <https://www.standard.co.uk/futurelondon/theplasticfreeproject/waste-recycling-councils-recycle-uk-landfill-a4086311.html>

¹⁸ GOV UK. Waste & Resources Strategy for England, March 2018. Available at: <https://www.gov.uk/government/publications/resources-and-waste-strategy-for-england>

¹⁹ Lets recycle. Redditch spot checks find 23% contamination, February 2020. Available at: <https://www.letsrecycle.com/news/latest-news/redditch-spot-checks-find-23-contamination/>

²⁰ Ministry of Ecology and Environment of the People's Republic of China (2018) Announcement on Adjusting the "Imported Waste Management Catalog" Available via: https://rethinkplasticalliance.eu/wp-content/uploads/2021/01/rpa_waste_shipment_regulation_recommendations.pdf

²¹ Environmental Protection Department of the Government of Hong Kong Special Administrative Region (2020) Waste Plastics Import and Export Control. Available at: https://www.epd.gov.hk/epd/english/environmentinhk/waste/guide_ref/guide_wiec_tcs6.html

The UK should reverse the worrying trend of increasing rates of incineration. In England, incineration doubled between 2012 and 2018 and 50 more incinerators are either proposed or in development²². In Scotland there are plans to increase incineration capacity by a further 1 million tonnes over the next few years²³.

Fundamentally, a reduction of UK waste shipments should not result in an increase in domestic landfill and plastic waste incineration. Incinerating plastic releases harmful toxins into the environment and undermines the Paris Climate Accord. As exports can be phased out to align with tangible reductions in plastic waste generation and investment in domestic recycling infrastructure, the UK should commit to a moratorium on new incineration capacity.

vii. *Prioritise and outline the government's commitment for the provision of adequate support and resources to fully implement and enforce the UK Plan for Shipments of Waste and associated Regulations and Policies*

Each year, waste crime costs around £600 million in England alone²⁴. We welcome the initiation of the Joint Unit for Waste Crime and the recent rise in the Environment Agency's waste crime budget (£60m for 2014-22)²⁵. However, we would like to reiterate that policies are only as effective as their enforcement, and the sheer scale of waste export crime in the UK is not currently matched by the resources provisioned to tackle it. Particular points of concern include the following:

- In 2018/19 the Environment Authority only inspected 926 shipping containers at port and returned 236 of these to their site of loading, having estimated a total of 12,690 tonnes of waste from port and on-site inspections being illegally exported during that period²⁶.
- The likelihood that plastics are being exported in the form of "contaminants" within other material waste exports. For instance, in 2019, recycling specialists DS Smith measured enough plastic contamination in paper and cardboard materials at its Kemsley Paper Mill to fill up 4.8 million black bin bags²⁷.
- Illegal waste shipments to, for instance, to Poland²⁸, Turkey and Malaysia are becoming increasingly common²⁹. Many of these countries are in the OECD.

²² Greenpeace Unearthed. UK waste incinerators three times more likely to be in poorer areas, July 2020. Available at: <https://unearthed.greenpeace.org/2020/07/31/waste-incinerators-deprivation-map-recycling/#:~:text=Rates%20of%20incineration%20in%20England,anti%20incineration%20group%20UKWIN%20respectivel>

²³ Friends of the Earth. Revealed: Scotland to burn an extra one million tonnes of waste a year, September 2020. Available at: <https://foe.scot/press-release/revealed-scotland-to-burn-an-extra-one-million-tonnes-of-waste-a-year/>

²⁴ GOV UK. Independent review into serious and organised crime in the waste sector, pg. 2, November 2018. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/915937/waste-crime-review-2018-final-report.pdf

²⁵ GOV UK. Waste & Resources Strategy for England, March 2018. Available at:

<https://www.gov.uk/government/publications/resources-and-waste-strategy-for-england>

²⁶ Waste Management Plan for England, January 2021. Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/955897/waste-management-plan-for-england-2021.pdf

²⁷ Lets recycle. Mixed recycling 'doubles contamination', February 2020. Available

at: <https://www.letsrecycle.com/news/latest-news/mixed-collections-contamination/>

²⁸ Greenpeace Unearthed. Poland is returning illegal UK waste, August 2018. Available

at: <https://unearthed.greenpeace.org/2018/08/13/poland-waste-uk-illegal-investigation/>

²⁹ See e.g. Grid-Arendal (website). The Trade in Plastic Waste. Available at:

<https://www.grida.no/publications/333> WasteForce (February 2020). WasteForce Crime Alert #5: December- February 2020. Available at: https://www.wasteorceproject.eu/wp-content/uploads/2020/03/WCA_5.pdf

- In 2018, Poland repatriated 45 containers (i.e. 1,000 tonnes) of tins, boxes, detergent packaging and engine oil illegally labelled as plastic for recycling. (CrimeAlert #3, 2019)³⁰.
- Around 160,000 tonnes of plastic waste sent to Turkey for recycling is instead being dumped and burned on the side of roads. The UK sends more plastic waste to Turkey than to any other country³¹.
- In January 2020, the Malaysian government refused and returned 150 containers carrying 3,375 metric tons of illegal plastic waste to their countries of origin, including 42 containers from the UK³².

viii. Ensure that waste trade data is publicly accessible

The government's commitment to mandate the digital recording of waste movements, as outlined in the Environment Bill, and subsequent investment in the creation of such a framework³³, is strongly welcomed. We urge the government to make this waste trade data online and publicly accessible.

The public has the right to know where its waste ends up, and transparency is the greatest remedy to prevent leakage and environmental unsound waste management. The UK needs real-time, online reporting processes that all stakeholders can access at any time. Harmonised and standardised electronic systems for shipments subject to prior informed consent and general information requirements procedures would avoid the burden of paper-based documentation.

ix. Ensure that the government's priority within the UK Plan is the reduction of waste (generated within and shipped from the UK)

In addition to recovery/ recycling of waste being omitted within this UK Plan, we believe there is not enough emphasis on the need to focus on waste reduction (and waste shipment reduction). The government acknowledges the need to reduce the movement of hazardous waste to a minimum (in accordance with Article 42(d) of the Basel Convention), and given the interlinking proliferation plastic production and waste has contributing to climate change in addition to its harmful impact on the environment and human health it is clear that targets for reducing both the production and shipment of plastic waste to a minimum should also be outlined within this UK Plan in addition to significantly increasing domestic recycling capacity.

As outlined in our Greener UK & LINK Briefing for Commons Second Reading of the Environment Bill back in February 2020 we have sought an assurance from the government that it will seek to introduce legally binding targets on waste minimisation through the power in Clause 1, matching or surpassing the reported ambition of the EU's early 2020 proposed target to halve waste and potentially resource consumption by 2030³⁴. Given that the implications of UK resource use extend

³⁰ IMPEL (August 2019). WasteForce Crime Alert #3: June-August 2019. Available at: <https://wasteforceproject.eu/wp-content/uploads/2019/09/WasteForce-Waste-Crime-Alert-3.pdf>

³¹ IMPEL (2020). WasteForce Crime Alert #7: June-August 2020. Annex IV. Available at: <https://www.wasteforceproject.eu/wp-content/uploads/2020/10/Waste-Crime-Alert-7.pdf>

³² BBC News. Malaysia returns 42 containers of 'illegal' plastic waste to UK, January 2020. Available at: <https://www.bbc.com/news/uk-51176312>

³³ GOV UK. Smart tracking of waste across the UK: GovTech Catalyst competition winners announced, February 2019. Available at: <https://www.gov.uk/government/news/smart-tracking-of-waste-across-the-uk-govtech-catalyst-competition-winners-announced>

³⁴ Euroactiv. LEAK: EU's new circular economy plan aims to halve waste by 2030, February 2020. Available at: <https://www.euroactiv.com/section/circular-economy/news/leak-eus-new-circular-economy-plan-aims-to-halve-waste-by-2030/>

far beyond our borders, targets on minimisation must also ensure a reduction of the UK's global material footprint. This is because the vast majority³⁵ (81 per cent as of 2014) of resource extraction to meet final UK demand occurs abroad. In line with the waste hierarchy, significant waste minimisation should be achieved through significant reductions in use of resources in the first instance, followed by a major increase in reuse and resource productivity. The UK is on course to easily exceed the government's current target to double resource productivity by 2050. We welcomed the government's commitment to introduce legally binding waste targets in the summer of 2020³⁶ and encourage the government to accept the call to set targets for the reduction of plastic pollution specifically, as outlined in the letter sent by Friends of the Earth and others on January 22 2021³⁷.

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³⁵ CIE-MAP. Developing a carbon metric of resource efficiency., 2018. Available at: <http://ciemap.leeds.ac.uk/wp-content/uploads/2018/09/CIEMAP-Briefing-Note-Resource-Efficiency-Metrics-v2.pdf>

³⁶ Lets Recycle. Defra to set legally binding waste targets, August 2020. Available

at: <https://www.letsrecycle.com/news/latest-news/defra-to-set-legally-binding-waste-targets/>

³⁷ Friends of the Earth. Letter on setting targets in the Environment Bill for the reduction of plastic pollution, January 2021. Available at:

<https://cdn.friendsoftheearth.uk/sites/default/files/downloads/Joint%20letter%20to%20PM%20on%20plastics%20reduction%20targets%20in%20the%20Environment%20Bill%2022%20Jan%202021.pdf>