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Ocean

# The UK's Trade in Plastic Waste

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## Introduction

Recent years have witnessed an alarming increase in the illegal trade of plastic waste, with high-income countries consuming plastic products and packaging at unsustainable rates, exporting their plastic waste to developing countries with little capacity and infrastructure to manage it, which impacts on communities, economies and ecosystems around the world.<sup>1</sup>

In addition to contributing to plastic pollution in all environmental compartments, mismanaged plastic waste releases harmful chemicals,<sup>2</sup> reduces water quality,<sup>3</sup> diminishes biodiversity,<sup>4</sup> threatens food security,<sup>5</sup> harms human health<sup>6</sup> and contributes to climate change.<sup>7</sup> Moreover, exploitative working conditions and child labour are often connected with this issue.<sup>8</sup>

The UK is the second largest producer of plastic waste per capita in the world, creating 99kg per person in 2016<sup>9</sup>, and the British Plastics Federation estimates the UK produced about 4,593,000 tonnes of plastic waste

in 2020.<sup>10</sup> Of this, approximately 20 per cent (890,000 tonnes) was exported – 54 per cent of what supposedly had been recycled.<sup>11</sup>

As of 2020, the majority of plastic waste exports are sent to be treated in countries such as Turkey, Malaysia and Poland, which have low recycling rates and serious problems with illegal activity, including dumping and burning.<sup>12</sup> For example, the UK shipped at least 209,642 tonnes to Turkey in 2020 alone,<sup>13</sup> the equivalent of approximately 108 twenty-foot equivalent unit (TEU) shipping containers per day<sup>14</sup> to a country which is reported to send 90 per cent of its plastic waste to landfill.<sup>15</sup>

Despite temporary disruptions due to the COVID-19 pandemic, the UK still relies on exporting a significant proportion of its plastic waste. This is despite domestic recycling facilities running at as low as 60 per cent capacity in 2020 and expected to run at just 71 per cent capacity through 2021.<sup>16,17</sup>

## Basel amendments on plastic waste trade

The Basel Convention (1989) is an international treaty designed to reduce hazardous waste generation, promote environmentally sound management of hazardous wastes and to restrict where necessary transboundary movements of hazardous wastes between countries. In May 2019, amendments to the Basel Convention were adopted to require Prior Informed Consent (PIC) for exports of plastic waste, unless sorted by polymer, destined for recycling and 'almost free from contamination'.

The Organisation for Economic Co-operation and Development (OECD), of which the UK is a member, implements the Basel Convention, establishing a framework for the trade in hazardous and certain other wastes among OECD countries. As a result, trade in wastes is often characterised by whether the shipment is destined for an OECD country or not.

The Basel amendments entered into force on 1 January 2021, meaning that "Y48" shipments of waste (dirty and

mixed plastic waste) can only be exported to a non-OECD country subject to the PIC procedure. However, in recognition of high mismanagement rates, the EU has fully prohibited the export of mixed and unsorted plastic waste to non-OECD countries.<sup>18</sup> The UK has yet to do so, despite a manifesto commitment from the current Government to "ban the export of plastic waste to non-OECD countries, consulting with industry, NGOs and local councils on the date by which this should be achieved."<sup>19</sup>

The EU is also considering a ban on all plastic waste to non-OECD countries in its review of the EU Waste Shipment Regulation, the EU equivalent to the UK's Transfrontier Shipment of Waste Regulations.<sup>20</sup>

**Above:** Kuching, Malaysia, May 2018. Malaysia is a top destination for UK plastic waste exports – a country with extremely limited capacity for enforcement and reprocessing

**Front cover:** Kendal Regency, Java, Indonesia, December 2019. Since China's ban on waste imports in 2018, much of the UK's exports have been redirected to South-East Asian countries such as Indonesia, where it is accumulating in informal dump sites and leaking rapidly into the environment



## Policy recommendations

### The UK should take immediate steps to prevent additional damage to human health and the environment from the production and export of plastic waste:

- **Ban plastic waste exports.** The UK Government has committed to banning plastic waste exports to non-OECD countries. However, plastic waste exports sent to OECD countries, which in 2020 comprised 79 per cent of UK exports,<sup>21</sup> are also problematic and harmful. Of note are shipments to countries in South-East Asia, as well as Eastern European countries that are also increasingly targeted for plastic waste exports by other European countries.<sup>22</sup> In line with the principle of proximity outlined within the Basel Convention, waste should be managed as close as possible to the point of generation. Consequently, the UK should commit to phasing out all plastic waste exports. To the extent any exceptions are provided, they should be limited to exceptional circumstances and subject to robust controls to ensure environmentally sound management. A ban should be coupled with a moratorium on new incineration capacity and an escalating incineration tax.<sup>23</sup>
- **Reduce waste generation and promote resource efficiency and a circular economy for plastics.** Along with restrictions on plastic waste exports, the UK should promote an ambitious package of policies as part of the Environment Bill and devolved nation Resources and Waste Strategies to significantly reduce plastic waste generation while promoting resource efficiency and a safe circular economy for plastics. The 25 Year Plan includes the UK objective of achieving zero avoidable plastic waste by the end of 2042.<sup>24</sup> To achieve this, the

Government should include UK-wide separate waste collection, consistent recycling and reuse throughout the UK including via eco-design, all-in deposit-return, charges on single-use and virgin plastics and functional extended producer responsibility (EPR) schemes, in addition to Government-mandated plastic reduction targets and necessary increases in mechanical recycling infrastructure.

- **Ensure traceability and transparency.** The public has the right to know where its waste ends up and traceability and transparency are critical to identifying and preventing leakage and environmentally unsound waste management. To this end, the UK should ensure data accuracy, traceability and transparency through real-time reporting processes accessible to all stakeholders. Harmonised and standardised electronic systems for in-country movements and limited exceptions to transboundary shipments would also avoid the burden of paper-based documentation.
- **Improve inspection and enforcement.** The UK's illicit waste market is estimated to be worth up to £3.7 billion – at least double that of any other European state.<sup>25</sup> An independent review into serious and organised crime in the waste sector also revealed the rampant extent of waste crime in the UK; in 2015, illegal waste activity was estimated to have cost more than £600 million in England alone.<sup>26</sup> EIA welcomes the recently launched Joint Unit for Waste Crime (JUWC) and urges the UK to ensure adequate resourcing for enforcement agencies to be able to properly monitor shipments and undertake investigations and intelligence-led enforcement to ensure the timely prosecution of plastic waste crime.

## References

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6. CIEL et al. (2019). Plastic and Health: The Hidden Costs of a Plastic Planet. [Available here.](#) Also see: GAIA (2020). Discarded: Communities on the Frontlines of the Global Plastic Crisis. [Available here.](#)
7. CIEL et al. (2019). Plastic and Climate: The Hidden Costs of a Plastic Planet. [Available here.](#)
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10. British Plastics Federation (2021). 2030 Recycling Roadmap. [Available here.](#)
11. British Plastics Federation (2021). 2030 Recycling Roadmap. [Available here.](#)
12. INTERPOL (2020). Strategic Analysis Report: Emerging Criminal Trends in the Global Plastic Waste Market Since January 2018. p.32. [Available here.](#)
13. GOV UK (2021) UK Trade Info. [Available here.](#) Which in comparison to other exports cited within Trade Info amounts to 39.00779% of all UK plastic waste exports that year.
14. ISRI Guidelines for Plastic Scrap (2013). Plastic bale density = 10 lbs/ft<sup>3</sup>; volume of 20 ft shipping containers = 1172 ft<sup>3</sup>; weight of baled plastic/TEU container = 11,720 lbs (5,316.10 kg). 209,642.17 tonnes results in an equivalent 108.04 TEU shipping containers per day over the course of an entire year. [Available here.](#)
15. OECD (2019). Turkey Highlights 2019, p.5. OECD Environmental Performance Reviews. [Available here.](#)
16. British Plastics Federation (BPF) (2021). Recycling Roadmap. p.6. [Available here.](#)
17. N.B. Data on this topic is currently unreliable. We have cited median [British Plastic Federation \(BPF\)](#) estimates instead of government data because:
  - The latest publicly available [UK statistics on waste](#) (March 2020 update) is from 2016. Furthermore, plastic waste found within mixed and undifferentiated materials and household and similar wastes categories cannot be ascertained from the data available. Furthermore, this dataset states that the UK produced [1,528,527 tonnes of plastic waste in 2016](#) whilst EUROSTAT data cites the UK having generated [2,568,031 tonnes in 2016](#).
  - In addition, UK government data is underestimated. [Trade Info data](#) for 2019 and 2020 says the UK exported 539,502.85 and 537,436.69 tonnes of plastic waste, respectively. However, when using the number of Packaging Export Recovery Notes (PERN) issued as a proxy for total plastic packaging (a subset of UK's exported plastic waste) shows that [61% of 2019 plastic packaging accepted for recycling or recovery was exported](#) - which alone amounts to 691,993 tonnes (2019 Gov National Packaging Waste Database data stipulates 617,307 tonnes was exported).
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19. The Conservative and Unionist Party (2019). Get Brexit Done: Unleash Britain's Potential. The Conservative and Unionist Party Manifesto. Page.43. [Available here.](#)
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22. Recipient OECD countries also included Turkey, however in 2021 they banned the [import of unsorted plastic waste and all imports of polyethylene plastics starting in from July 2021](#). Both will have an impact on UK plastic waste exports to the country.
23. N.B. For more information, [please see here.](#)
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