



environmental  
investigation  
agency

**GREENPEACE**

## Checking out plastic policy

Assessing UK retailer positions  
on policy approaches to  
reducing plastic pollution

February 2021







## Introduction

In 2020, EIA and Greenpeace UK undertook a third survey of the major supermarkets in the UK to gain insight into how the sector is working to tackle plastic pollution, track their progress, and also assess retailer views on associated government policy.

*Checking Out on Plastics III* revealed that during 2019, the 10 major supermarkets in the UK put 896,853 tonnes of plastic packaging on the market.<sup>1</sup> This was a reduction of 1.6 per cent over the previous year, but a 1.2 per cent increase compared to 2017.

A key finding of the report was that the current pace of change is insufficient to meet the scale of the plastic pollution crisis.

It is clear that retailers have targets in place and are in the early stages of delivering plastic-reduction strategies across packaging, bags, single-use items and within the supply chain. However, we are also keen to understand retailer positions as to how Government policies can help drive progress and level the playing field for the sector.

On 1 October 2020, new legislation came into force in the UK to ban plastic stirrers, straws and cotton buds, following earlier bans on intentionally added microbeads and a Conservative manifesto commitment to stop the export of plastic waste to non-OECD (Organisation for Economic Co-operation and Development) countries.<sup>2</sup>

UK Government and supermarket efforts plans to reduce plastic are a necessary step in the fight against plastic pollution but currently insufficient. Upcoming measures, like those outlined in our assessment, can enable the retail sector to move forward in eradicating harmful products without being competitively disadvantaged.

In addition to assessing plastic footprints and reduction initiatives, the EIA/Greenpeace UK survey asked supermarkets about their position with regard to binding Government targets on plastic reduction and reuse, as well as a UK-wide all-inclusive deposit return scheme (DRS) and the application of extended producer responsibility (EPR), which are currently in the process of being designed and implemented at various stages across the UK.

We wanted to assess the level of support and ambition retailers have for these Government-mandated measures to aid efforts on plastic reduction and have outlined our findings and recommendations in this briefing.

### Reduction targets

In response to our question on binding plastic reduction targets, Aldi, Iceland, Tesco and Waitrose expressed complete support for mandated targets to be set nationally, while the remaining six preferred targets set at the company level, where they could relate objectives to their own operation and level of ambition.

As supermarkets are first and foremost for-profit businesses, we anticipated responses would somewhat favour non-committal objectives, given that they provide a degree of flexibility to back-pedal or amend initiatives according to internal priorities.

However, as is demonstrated in *Checking Out Plastics III*, the current picture of targets, baselines, data collation methodology and ambition – as well as levels of performance in achieving these different goals since 2017 – still varies significantly across the sector, not only making the task of evaluating progress complex but also creating an unequal and opaque picture of the overall state of play.

Furthermore, recycling alone is not an adequate solution to the plastic pollution crisis. Only 9% of plastic made has ever been recycled<sup>3</sup>, and plastic can only be recycled a finite number of times before it downgrades beyond use in functional applications.

**Our position is that transparency and standardised accessibility of reporting is paramount and that targets on plastic and overall packaging reduction should be included within the provisions of the**

**Environment Bill and set at the national level alongside recycling<sup>4</sup> in order to drive progress across the entire retail sector** (including online retailers).

Binding plastic reduction targets not only provide the opportunity to level the playing field but would also incentivise the spread of innovative solutions which are not yet practiced at such an economy of scale, which would lessen the risks and

### Retailer snapshot: Iceland's stance on Government-mandated reduction targets

Iceland's managing director Richard Walker said: "Our message is clear. Without transparency and Government-enforced reduction targets, we will not be able to judge whether business actions are delivering real progress. That is why today Iceland is calling on retailers and other businesses to step up and commit to publishing their total plastic packaging transparently, including both own label and branded products. For several years now, businesses have been using incomplete information to represent the scale of their plastic packaging, their commitments to change and the progress being made. We will all be better served by a more accurate and transparent picture on this issue.<sup>6</sup>

*Source: Excerpt from Iceland press release on joining campaigning organisations in calling for better corporate reporting on plastics, supported by Government, 2020*



Table 1: Company positions on plastics policy questions in 2020 EIA and Greenpeace UK survey for Checking Out on Plastics

	Aldi	Asda	Co-op	Iceland	Lidl	M&S	Morrisons	Sainsbury's	Tesco	Waitrose
<b>Binding plastic reduction targets</b>	✓	X Do not believe the Government needs to set targets for retailers	X Support at individual company level	✓	X Support at individual company level	✓ (in context of EPR and modulated fees)	X Support at individual company level	X Support at individual company level	✓	✓
<b>Binding reusable packaging targets</b>	✓	X Do not believe the Government needs to set targets for retailers	No position yet	✓	X Support at individual company level	✓ (in context of EPR and modulated fees)	X Support at individual company level	X	✓	✓
<b>An all-inclusive (all sizes, all materials) Deposit Return Scheme for beverage containers</b>	✓ Will be installing 40 reverse vending machines in Scottish stores	X Believe that DRS should only be initiated if necessary, as a result of EPR or consistent collection systems not meeting their targeted outcomes. Concerns related to costs	✓ (noting some concerns around scope)	✓	✓	X Support in principle for some materials but noted concerns about impact on kerbside collection. Priority is EPR	X Support in principle but concerned about glass. See it as part of a wider national programme	✓	✓	✓ (has concerns about glass)
<b>An Extended Producer Responsibility system which incentivises design for reduction and reuse, as well as recycling, with revenues raised from fees used to support reuse and refill systems</b>	✓	✓ (with caveats that costs need to be applied in the right parts of the supply chain)	✓	✓	✓ (emphasise need for funds to be used to incentivise recycling, reduction and reuse)	✓ (emphasise need for funds to be used to incentivise recycling, reduction and reuse)	✓ (noted concerns about costs to consumers and businesses)	✓ (support an EPR system which incentivises design for reduction and reuse as well as recycling, with revenues raised from fees used to support reuse and refill systems) + packaging tax	✓ (open to revenues being used for reuse and refill systems, but would also urge government to use funds to end the inconsistent approach to recycling in the UK)	✓ (see this as the priority over DRS)

unknowns about which supermarkets are concerned. Plastic reduction is needed within a short-time frame – the UK's 25-Year Plan expects to eliminate avoidable plastic waste by the end of 2042 – thus we encourage supermarkets to see the benefits which legal obligations for reduction could bring in achieving this goal.<sup>5</sup>

### Reuse targets

With regards to binding targets for reusable packaging, the same four supermarkets were supportive of such a Government measure; however, responses on where other supermarkets stood and the proposed alternatives of such measures varied. For instance, the Co-op is still exploring this area and M&S could see support for such targets being included within the provisions of the EPR scheme (the same as its stance on reduction targets). Only Asda expressly stated that it did not see a need for reuse targets set at the Government level.

Supporting mandated targets, Tesco pointed to the different approaches retailers would need in delivering on reuse, highlighting its online partnership with Loop as one method.<sup>7</sup>

Waitrose's response focused on the role reusable packaging will play in delivering overarching packaging reduction targets and the importance of its trialling of an in-store reuse and refill system via its Unpacked store to understand the nuances of rolling it out more widely.<sup>8</sup> It underscored its response by noting that widespread industry uptake will be the only way to achieve impact, with Government targets creating the impetus to do so.

Using the Waste and Resources Strategy for England as an example, the UK Government has indicated its ambition in ensuring packaging is reusable and that it is working towards all plastic

packaging placed on the market being recyclable, reusable, or compostable by 2025.<sup>9</sup>

Given the scale of ambition and collaboration required to transition to a fully circular economy, which includes a reduction of plastic packaging and the widespread scaling up of reuse, refill and reverse logistics, **EIA and Greenpeace UK have been calling on both companies and the Government to introduce further targets<sup>10</sup> and to create infrastructure to support such a transition.**

Additionally, there is a clear need for further stakeholder engagement to emphasise the importance of, and desire for, reuse targets for primary, secondary and tertiary packaging in order to help retailers define what plastic packaging reduction could look like.<sup>11</sup> In order to enable this change, we recommend that retailers establish reuse targets in their operations to complement their

plastic reduction targets. These reuse targets will help define the 'how' of plastic reduction efforts internally and create the enabling environment for change.

Based on our work with the sector, we suggest the following targets:

- at least 25 per cent of consumer packaging should be reusable by 2025, increasing to 50 per cent by 2030;
- at least 75 per cent of transit (or secondary and tertiary) packaging should be reusable by 2025, increasing to 90 per cent by 2030;
- publicly share a company action plan on reuse with a timeline which shows measurable, independently audited results by 2023.





## Snapshot: What is reusable packaging?

Reusable packaging exists across primary, secondary and tertiary packaging and is defined by packaging that is refilled or used for the same purpose for which it was conceived, in its original form, with no additional reprocessing needed except for cleaning.

Reusable packaging is designed to accomplish a minimum number of trips, or rotations, in a system designed for reuse. A reuse system is defined as established arrangements (organisational, technical or financial) which ensure the possibility of reuse (in a closed-loop, open-loop or hybrid system). Work still needs to be done on more detailed definitions for reusable packaging in the consumer sphere, but the following sub-categories are a useful starting point:

### Reusable transit packaging

Secondary and tertiary packaging designed for reuse within a supply chain, constructed for multiple trips and extended life, in a closed-loop business to business (B2B) system.

### Reusable consumer packaging

Primary packaging in four key formats:

- **refill at home:** Users refill a reusable container at home (e.g. refills delivered via a subscription service); the container is owned by the customer;
- **return from home:** Reusable containers are collected from home by a pick-up service (e.g. a logistics company) and refilled; the container can be owned by the customer or rented from the company;
- **refill on the go:** Users refill their reusable container away from home (e.g. an in-store dispensing system); the container can be owned by the customer or rented from the company;
- **return on the go:** Users return reusable containers at a store or drop-off point (e.g. in a deposit return machine or a drop box); the container can be owned by the customer or rented from the company.

NB: Naked/packaging-free products (e.g. a loose shampoo bar) are not included in this framework.

Source: Excerpt from Greenpeace UK briefing paper: *Setting targets on reusable packaging in grocery retail, 2020*<sup>12</sup>

## Deposit Return Scheme

In our survey, support for DRS remains cautious, with nine supermarkets generally supporting DRS in principle but with just under half also raising concerns about its scope, both in terms of the inclusion of glass<sup>13</sup> and the potential impacts on kerbside collections.<sup>14</sup>

M&S, Asda and Waitrose noted that Producer Responsibility reforms should be the priority of the policy measures slated for introduction in the UK, with Asda commenting that DRS should only be initiated if necessary as a result of EPR or consistent collection systems not meeting their targeted outcomes, while also raising concerns about costs to consumers – something which was echoed by other retailers.

In addition to Tesco noting that it is supportive of an all-inclusive DRS, it has been active in engaging across the UK to take a consistent approach to the materials in scope, product labelling, administration and implementation timing, highlighting that a patchwork approach to DRS within the UK would cause customer confusion, be open to fraud – something the Co-op felt digital technology could support in addressing – and could be counter-productive.

Waitrose flagged concerns about glass and emphasised the need for Government support for set-up costs, including new reverse vending machines, ensuring that the scheme does not undermine kerbside collections and taking account of wider taxation burdens on business.

A key finding is that for many of the retailers surveyed, their positions will be more formalised after they have had the opportunity to use an ambitious all-in DRS scheme, but also that DRS needs to be consistent across the UK.

Furthermore, retailers expect DRS to form part of an holistic approach to redesigning our infrastructure for material collection at home and in-store, within the recycling sector and ensuring that the cost burden is distributed fairly.

We agree with retailers in encouraging standardisation of DRS across the UK but take the view that an all-inclusive DRS (including the provision of glass) is necessary.<sup>15</sup> This is in light of the Scottish Government's decision to include glass within Scotland's DRS – on the grounds of environmental gains from emissions reductions and prevention of glass littering the environment – and the importance of having a harmonised system across all UK countries. **Consistency with Scotland would also require a minimum deposit level of 20p to be set.**

The reason many companies are lobbying to have glass excluded is because it is costly to collect via a DRS and this is a cost they may wish to avoid. Glass has a much lower value in comparison to PET and aluminium<sup>16</sup> so although it may be a popular choice of packaging for producers, it does not suit them within the framework of a proper circular economy.

**The UK's deposit system should require producers who are choosing to use glass to pay the full recovery costs for this packaging, because:**

- if glass was excluded, it would continue to be littered, causing environmental damage that would not be covered by any complementary payments made by drinks producers via EPR for waste collection. While PET and HDPE containers cause proven problems in aquatic environments, glass faces the additional issue of being harmful to people and wildlife on land if broken.<sup>17</sup>
- to retrofit a deposit system to take glass can be extremely costly, as was recognised by Scottish Government in its announcement on deposit return, a reality which led it to approve the inclusion of glass within Scotland's system.

Our analysis challenges the perception that DRS will have an adverse effect on kerbside recycling, because:

- a DRS system where container size is limited would leave councils to deal with larger, bulkier containers either as litter or in kerbside recycling. This equates to higher volumes within collection systems – effectively, they are collecting more air – which leads to higher costs;
- an 'all-in' system would enable cost savings for local authorities as kerbside recycling could potentially be reduced to a bi-weekly basis and there would be a substantial reduction in costs from street cleansing;
- given that current DRS and EPR plans are due to be introduced at the same time, any concerns over the financial impact on councils due to a loss of materials from kerbside recycling systems are not only false (as international evidence from existing deposit systems and research shows<sup>18</sup>) but also negligible, as kerbside recycling systems will be funded by producers through EPR and not by councils and citizens through their local taxes;
- we would also support the system being designed to ensure that local councils can redeem the deposits on any drinks containers they collect, either by street cleansing or through kerbside collection. This would ensure they are compensated, otherwise the costs of collecting this small percentage of containers would fall between the two producer responsibility systems – i.e. DRS and EPR;





## Snapshot: Extended Producer Responsibility

Extended Producer Responsibility (or Producer Responsibility) is a regulated system and policy whereby the full net costs of managing a product (in this case, plastic packaging) from production to waste treatment is placed on the businesses that produce and use said product, rather than taxpayers.<sup>20</sup>

This can be implemented in a manner which will also have an impact on how a product is designed, encouraging recyclability and reuse if EPR design means that they will become more financially interesting options for these businesses, which now have the added costs of being responsible for what they make.

There are different definitions of what this system could look like; we see EPR schemes aligning with the 'polluter pays principle', full cost recovery and the OECD's full lifecycle definitions. For instance, to date businesses producing and using plastic packaging are not paying the full price of the harmful economic, environmental and human health impacts plastic packaging causes throughout its entire lifecycle. A successful EPR scheme is a framework that internalises and builds in all these costs throughout the production, use and discarding process.

Source: Description of Extended Producer Responsibility<sup>21</sup>

- our view is that the separation of Producer Responsibility reforms and the introduction of DRS are ill-advised because **DRS is itself a form of EPR** specifically for the beverage industry, so introducing them separately can only cause confusion, particularly given that retailers are themselves technically beverage producers with a responsibility to meet 100 per cent of the costs associated with their products;
- additionally, we see DRS as needing to include functionality for facilitating reuse of returned containers, not just recycling.

**We urge retailers to include transparent engagement on DRS within the scope of discussions with branded suppliers to ensure supply chain cohesion and an ambitious DRS, not only in the UK but to help set a wider precedent internationally.**

**We encourage retailers and Government to continue pushing for ambitious and timely implementation despite the delays caused by the COVID-19 pandemic and the likelihood of a two-tier system in Scotland (due to be implemented in 2022, with the rest of the UK now delayed).**<sup>19</sup>

### Extended Producer Responsibility

Support for the EPR scheme was more consistent across retailers, with all 10 endorsing such a system. Half of them specifically noted the need for the scheme to incentivise recycling, as well as design for reduction and reuse. Both Morrisons and Asda noted the potential for increased costs for consumers, with Asda emphasising that the scheme should ensure costs are incurred at the right part of the supply chain. This latter point is particularly important for value retailers who wish to support the system but need to ensure no price burden on their customers.

Morrisons provided a comprehensive overview in its response, pointing to a Packaging Recovery Note (PRN) system that is "broken", with a "lack of transparency over how money is spent and the market-based pricing structure in some cases acting as a disincentive for recycling companies to invest in additional infrastructure." Its comments also emphasised a reform to the system that rewards more sustainable packaging choices, focused on reduction and reuse, noting in particular that the proposal for bonuses and penalties for recyclable and more widely recycled materials will facilitate the move from non-recycled materials.

Waitrose echoed similar concerns around needing to boost recycling efficiency and pointed to a need to sequence proposals from the Government's Waste and Resources Strategy for England to maximise effectiveness. Its view was that DRS should be used to plug the gaps in the collection and recycling system after EPR has been successfully implemented. A focus



**Above:** Plastic pollution is recognised as a global environmental problem of huge proportions, with plastic now found in the deepest ocean and remote polar regions.

of its response included the role of competition ensuring efficiency and innovation within a well-designed EPR scheme, ensuring a "lean strategic not-for-profit body" oversees the system and decides on the modulated fees and thresholds for recyclable packaging. It further noted the need for transparency and extensive communications around the role of citizens and businesses to highlight the benefits, boost participation and ensure consumer responsibility is part of the producer responsibility mechanics.

**We support a more ambitious model of EPR than what is being proposed by government and supported by retailers, with more detail in the recommendations sections below. For instance, an EPR scheme which incentivises producers to address upstream life cycle concerns at the design stage through effective eco-modulation of fees.**

### Engagement with Government and policy-makers

The 2020 survey showed that UK retailers are broadly supportive of greater regulatory efforts to level the playing field in order to underpin their current efforts to reduce plastic pollution, but many felt action at the company level would be sufficient.

Fundamentally, business is able to move faster than Government policy and thus we support the retailers taking action now in their stores. However, Government-led policy development will create a clear and fair operating environment for the sector and reduce competitive disadvantages for the more progressive retailers.

Our view is that comprehensive and ambitious Government policy would assist in harmonising regulatory standards, establish clear baselines for monitoring progress and create clear reporting standards across the plastic value chain and retail sector, ultimately ensuring that companies are held accountable for their corporate commitments against a transparent and level playing field.

Moreover, with clear national action plans for plastic reduction, companies will benefit from the development of infrastructure to facilitate more integrated systems for packaging design, reverse logistics, material collection and waste management.

## Snapshot: ePRN/ePERN System

The UK's current Extended Producer Responsibility system for waste packaging focuses on recovery and recyclability.

By law all businesses (with the exception of certain smaller businesses) which produce or use packaging must ensure that a proportion of their packaging (produced or used) is recycled.<sup>22</sup> In order to demonstrate this, businesses buy Packaging Waste Recovery Notes (ePRNs) or Packaging Waste Export

Recovery Notes (ePERNs) from waste reprocessors and exporters.<sup>23</sup> Companies with smaller turnovers can join Producer Compliance Schemes which purchase Notes on their behalf.

As of 1 January 2021, the 2021 business target is that 59 per cent of all plastic packaging produced or used must be recycled.<sup>24</sup> Market forces and packaging waste availability determine both ePRN and ePERN prices.

Source: Description of the UK's Packaging Waste Recovery Notes (ePRNs) and Packaging Waste Export Recovery Notes (ePERNs) system



# Recommendations

We recommend the retail sector uses its collective influence and continues to engage with the Government on progressive and necessary legislation and policy, including:

1. Urging the Government to use the Environment Bill to set **legally binding targets to reduce single-use plastics by 50 per cent by 2025** and to introduce **mandatory corporate reporting** on plastic reduction, in order to create a level playing field for all sections of the grocery industry.
2. Calling on the Government to pursue and support **standardisation of reusable packaging**,<sup>25</sup> including providing funding support for trials of **new systems**/reuse innovation, to help drive plastic reduction without relying on light-weighting to flimsy plastics and material substitution.
3. Asking for support via **financial incentives** to help the sector shift over to reuse. For instance, use Enhanced Capital Allowance (ECA) schemes to assist companies with investments in plant and machinery for reuse applications.
4. Ensuring that the new **Extended Producer Responsibility (EPR) requirements are designed to increase reuse and reduction of packaging as well as recyclability**, in line with the waste hierarchy. This should be achieved through a combination of reuse and reduction targets and modulation of fees to incentivise eco-design, reuse and reduction and penalise single-use packaging. Proceeds from producer fees can then be used to fund trials of new reuse and refill systems, allowing the retail sector to take advantage of the economic opportunities of reuse.

5. Continuing to push for an **all-in Deposit Return Scheme (DRS)** for drinks containers whose scope of materials and deposit level is consistent across the UK, including plastic, aluminium and glass at a minimum, and allowing for an improvement in collection and recycling rates, as well as creating the system conditions for the introduction of reusable and refillable systems for beverage packaging, and that it should be introduced at the same time as Extended Producer Responsibility reforms.
6. Encouraging the Government that reforms to the current Packaging Recovery Note (**ePRN/ePERN system**) include:
  - **increased transparency**, to help ensure successful regulation against fraud;
  - **increased funding and thresholds** to heighten collections and infrastructure;
  - **as well as measures to reduce price volatility** and stop this current system that ultimately incentivises the export of waste for recycling or the use of new unrecycled products as a more profitable alternative.
7. Working with the Government to implement a **closed loop integration system** for recycling plastic materials from supermarkets as part of the transition to a circular economy.
8. Joining other companies and the UK Government in the lead-up to the United Nations Environment Assembly in 2022 in supporting the call for a **global treaty** to combat and prevent plastic pollution and working with the industry to input into an ambitious treaty design during negotiations.

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10. For instance, the government has proposed a 30% plastic packaging tax to incentivise recycling and use of recycled content. We are concerned that just focusing on plastic packaging could have unintended consequences, where producers substitute plastic for another less regulated single-use material (which can also have negative environmental impacts). The tax should apply to all single-use packaging materials.
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12. Greenpeace UK, Setting targets on reusable packaging in grocery retail, 2020. Not available online.
13. It has been suggested by the drinks industry that glass should be excluded from a UK-wide DRS. The reason many companies are lobbying to have glass excluded is because it is costly to collect it via a DRS and this is a cost they would like to avoid.
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15. Glass, despite being one of the most recyclable materials, is found in high quantities in landfills or littered. The latest publicly available data on recycling rates in the UK shows that an estimated 37.4% of glass is not recycled - Defra UK Statistics on Waste, March 2019. [Available here.](#)
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