

## BRC RESPONSE TO THE DEFRA CALL FOR EVIDENCE ON COMMONLY LITTERED AND PROBLEMATIC PLASTIC ITEMS

DEADLINE: 12/02/2022

[https://consult.defra.gov.uk/environmental-quality/call-for-evidence-on-commonly-littered-and-problem/supporting\\_documents/Call%20for%20evidence%20document.pdf](https://consult.defra.gov.uk/environmental-quality/call-for-evidence-on-commonly-littered-and-problem/supporting_documents/Call%20for%20evidence%20document.pdf)

1. **Would you like your response to be confidential?** If you answered yes to this question, please give your reason

YES

NO

2. **What is your name?** Nadiya Catel-Arutyunova

3. **What is your email address?** [Nadiya.catel-arutyunova@brc.org.uk](mailto:Nadiya.catel-arutyunova@brc.org.uk)

4. It would be helpful for our analysis if you could indicate which of these sectors you most align yourself/your organisation with for the purpose of this consultation (please tick / circle one which is most applicable to you):

Public body

NGO

Retail Industry

Manufacturing Industry

Member of the general public

Other (please state)

5. **If you are responding on behalf of an organisation, what is its name?** British Retail Consortium

### WET WIPES

1. **Would you support a ban on wet wipes containing plastic?** You will be asked about possible exemptions in the following questions.

Yes

No

Don't know

Please give reasons and supporting evidence

*The British Retail Consortium's position is material neutral as we recognise that tackling some of the current environmental challenges goes beyond a specific material type and requires a comprehensive value-chain approach.*

*The issue of incorrect disposal of wet plastic wipes containing plastics is known and widely reported as being a reoccurring cause of sewer blockages, wider environmental marine pollution and*

microplastic leakages.

*It is important to underline that addressing the environmental challenges associated with ALL types of wet wipes, has implications for manufacturers, producers and wastewater management sector who have to work hand-in-hand with retailers to find the best way forward for consumers.*

*The BRC is a supporter of the WRAP's UK Plastics Pact and some of our members are signatories of the initiative with a clear commitment to deliver on the four targets by 2025. WRAP believes that a targeted approach to removing and reducing unnecessary or problematic plastic is essential to avoid unintended environmental consequences. We support this and want to see the retail industry continuing to drive forward, being at the forefront of removing hidden plastic for their own-brand products.*

*Retailers already have a good track record, leading the way for their own-brand products, by removing plastic from cotton buds and banning microbeads, well before any legislation was introduced. **Once again, retailers have the opportunity to lead by example and act on wet wipes containing plastic,** as far their own-brand products are concerned.*

***Any measures that would ban or reduce the supply of wet wipes containing plastic needs further informed discussion with the wider industry and science-based impact assessments,** as switching from one material to another will not eliminate the incorrect disposal per se. Technical information, data and understanding is needed as to the various types of wet wipes, including wet wipes containing plastic, their composition and their properties after the point of disposal.*

*More generally, we believe that Defra needs to develop and implement a holistic approach to all wet wipe formats, foresee and resolve any unintended consequences of material switching, and ultimately provide a clear and aligned position with other Gov. departments as to what is understood as biodegradable, compostable and ultimately flushable wet wipes and under what conditions.*

*This is essential for many businesses currently investing in product development. It is important that Defra considers the costs associated with investment in product innovation and the need for businesses to have guarantees that their upfront innovation costs will not be dismissed by the Government further down the line, ultimately putting businesses operating in the UK at a competitive disadvantage with the rest of Europe.*

*We are aware that a large-scale switch to alternatives may lead to other unintended consequences (for example higher overall carbon footprint) and that some alternative materials do not always have the best environmental outcome. Some water companies have noted that 'flushable' alternatives to wet wipes also can clog systems wastewater systems too. Whatever the materials are concerned, the policy decisions should always be based on up-to-date full LCA and guarantee that materials will be recyclable at the end of their life.*

***Should Defra intend to explore this further, we would welcome industry-wide roundtables on this topic.***

*The retail industry has the potential to lead the way but would need absolute clarity on the scope, applications, and timings of implementation. Businesses need to have sufficient visibility and lead in time to sell through all stocks and get operationally ready, especially in light of the ongoing pressures the retail industry has to cope with. Clear definitions are needed as to what constitutes a 'wet wipe' in respect of any policy decision.*

*Determining the scope of a potential ban on wet wipes containing plastic will be essential, as some products like cosmetic pads should not be captured by any such legislation. Some retailers also believe that the measure could be considered only if wet plastic wipes used for medicinal/healthcare purposes are exempt in so far as there are a small number of wipes for healthcare where plastic-free alternatives are not yet effectively available.*

*We would encourage Defra to publish up-to-date data and studies complementing its impact assessment, and equally wish to underline that many of the retailers operate across the UK and even beyond the UK borders and would prefer to see alignment and coherence in the direction of travel.*

*The industry would particularly welcome official UK guidance on wet wipes which are entirely made of natural polymers that have not been chemically modified, like viscose and lyocell. Equally, we would support guidance on the correct disposal behaviours and wider consumers communication and education campaigns.*

*The BRC support the need for all brands and retailers to ensure there is careful instruction on the appropriate disposal on-pack for all kinds of wipes.*

**2. In the case of a ban on wet wipes containing plastic, would you support there being some exemptions for wipes used for medical purposes? Medical uses of wet wipes include patient care, spill absorption, and to clean equipment and surfaces. You will be asked about additional exemptions in the next question.**

**Yes**

No

Don't know

Please give reasons and supporting evidence

*As patient care is not solely hospitals but also in care home, social care settings and medical practices, we would suggest considering encompassing these settings too.*

**3. As well as wipes used for medical purposes, are you aware of any uses or situations in which the use of wet wipes containing plastic is essential and could be considered for any exemptions in future legislation?**

**Yes**

No

Please give reasons and provide supporting evidence.

*Some retailers believe that in some instances wet plastic wipes used for medicinal/healthcare purposes should be exempt in so far as there are a small number of wipes for healthcare where plastic-free alternatives are not yet effectively available.*

*It is also relevant to keep in mind the difference in the use of ALL wet wipes in domestic, commercial and industrial settings, whilst remembering the challenges that the COVID-19 pandemic has created in terms of health & safety (disinfection) of premises.*

**4. Are you aware of the water industry's Fine to Flush standard?**

**Yes**

No

**5. If you answered yes to question 4, do you think the current water industry 'Fine-toFlush' standard is effective in reducing sewer blockages caused by wet wipes?**

Yes

No

**Don't know**

Please give reasons and supporting evidence

*We understand that the Fine to Flush standard has been developed by Water UK, and that EDANA has its own standard which has a wider European coverage and has been promoting the 'Do not Flush' symbol.*

*The debate around 'flushability' remains an area with conflicting views, supplemented by the various positions on the biodegradability of various materials. Within our membership, some retailers are backing the Fine to Flush standard whilst others are using EDANA.*

*From our position, terminology needs to be meaningful to the consumers, and any standards/symbols need to be credible.*

*There needs to be one single consistent message to consumers around the correct disposal. Effectively, the symbol should not be misleading and give the idea that the product will break down (under non-specified conditions) leading consumers to think that flushing poses less of an issue. Some water companies have noted that 'flushable' alternatives to wet wipes also can clog systems wastewater systems too.*

**6. Do you support a mandatory 'flushability' standard for wet wipe products placed on the market to indicate more clearly which wipe products are truly flushable?**

**Yes**

No

Don't know

Please give reasons and supporting evidence

*A mandatory 'flushability' standard for wet wipe products placed on the market has the potential to provide a level playing field for industry.*

*However, we need to keep in mind consumers understanding of that standard in their everyday life. At the moment, the situation is rather contradictory from a consumer perspective with a standard (and ultimately labelling/symbol) indicating that the item is fine to be flushed on some products whereas another standard (and ultimately labelling/symbol) advises not to flush on a separate product.*

**7. Do you support mandatory labelling on packaging about disposal and the impact of wet wipe products on the environment?**

**Yes**

No

Don't know

Please give reasons and supporting evidence

*We support the idea of mandatory labelling on the packaging about the disposal, but not necessarily about the impact of wet wipes products on the environment, mostly due to the limited labelling space on pack.*

*From our position, any terms need to be meaningful and there needs to be one single consistent message to consumers around the correct disposal. Effectively, the symbol should not be misleading and give the idea that the product will break down (under non-specified conditions) leading consumers to think that flushing poses less of an issue.*

*Mandatory labelling on packaging will aid consumer awareness and correct disposal of wet wipes, but any labelling/logo should be visible at the point of use.*

*We would encourage Defra to engage with other relevant Gov. departments introducing new on-pack labelling requirement and to reflect on how best to coordinate/align such mandatory labelling on packaging with other labelling changes, so that all changes are happening at the same time to keep the associated costs with labelling low and that businesses have enough lead in time.*

**8. Would you support an extended producer responsibility scheme for wipes containing plastic? If so, how might this operate?**

Yes

No

**Don't know**

Please provide suggestions for how this might operate.

*In terms of a potential EPR for wipes containing plastic, we have the following reservations*

- *Need clarity on what is meant by an EPR for wet wipes and what would be the purpose – the issue with wet wipes containing plastic is the disposal not recycling*
- *Costs of setting up an EPR scheme: the administration and costs would outweigh its effectiveness in preventing the incorrect disposal of wet wipes*
- *Costs to consumer: price increase on the products*
- *Double counting in relation to Packaging EPR*
- *Essential to ring-fence so that any monies raised are directed to consumer education and easy to understand labelling instead.*

**9. What alternatives are there to single-use plastic wet wipes, including wipes made from non-plastic materials? We would welcome evidence on the cost of these alternatives, their environmental impact and any issues that could be caused by increased use of them.**

**Yes**

No

Don't know

Please give supporting evidence on the cost and environmental impact.

*We are aware of viscose-based wet wipes, bamboo fibre-based wet wipes*

## TOBACCO FILTERS

**10. Do you support the government taking regulatory action to tackle littering of tobacco filters?**

- Yes  
 No  
 Don't know

Please give reasons and supporting evidence.

*We support the Government taking regulatory action to tackle the environmental pollution caused by incorrect disposal of tobacco-related items such as tobacco filters. It is widely known that cigarette butts continue to be one of the most commonly littered items in the UK.*

**11.If the government takes forward an extended producer responsibility (EPR) scheme to tackle cigarette littering, which of the following costs related to managing littered tobacco filters, if any, do you think should be covered by producers?**

- campaigns aimed at promoting responsible disposal  
 provision of bins and management of binned filters  
 clearing up ground litter and subsequent treatment  
 data gathering and reporting  
 none  
 Other, please specify

Please give reasons and supporting evidence.

**12.Are there other regulatory approaches that government should consider? Please give reasons and supporting evidence.**

*No comment -*

**13.What are the financial costs of managing waste tobacco filters? Please give supporting evidence including quantified data where possible.**

*We are aware of the WRAP report on [the Financial Costs of Packaging Litter](#), produced by Eunomia, and published in March 2021.*

*This report estimated that the current total costs of litter collection for the UK local authorities and other duty bodies is £586 million.*

*The report features:*

- an estimate of costs of litter clean-up across the UK including for non-packaging items such as cigarette butts. 7% of local authorities' costs are attributed to cigarette butts (£46 million) – see page 58*
- Cigarette butts, understood as non-packaging, represent 98% of ground litter costs and only 2% of bin litter costs*

**14.What are the environmental impacts of waste cellulose acetate tobacco filters, including those associated with inappropriate disposal? Please give supporting evidence.**

*No comment -*

**15. What are the environmental impacts of tobacco filters made from alternative materials to cellulose acetate, including those associated with inappropriate disposal? Please give supporting evidence.**

*No comment -*

**16. What are the environmental impacts of smoking alternatives such as heated tobacco, disposable e-cigarettes, vape pods and oral nicotine pouches, including those associated with inappropriate disposal? Please give supporting evidence.**

*No comment -*

### SINGLE-USE PLASTIC SACHETS

**17. What environmental impacts do single-use plastic sachets have? What is the evidence in support of your view?**

*It is important that Defra provides further clarification of the definition and scope around sachets. The outlined definition is too ambiguous and open to interpretation (ex: what dimensions are being considered?)*

*More widely, single-use sachets are a vast category and some retailers have over 200 sachets that could be potentially impacted (food and non-food). A clear definition of what Defra is minded including in any potential measure is essential, especially for the beauty and healthcare sector whereby sachets are products or an integral part of the product, packaging and samples.*

*We are not aware of any evidence that would suggest that the alternatives to single-use plastic sachets are not proven to have a lower overall environmental impact, and therefore are not convinced that any measure (ban or charge) would be effective in delivering improved environmental outcomes without any unintended consequences.*

*However, if Defra are minded pursuing legislation, we would welcome further discussion and would need clarity on the potential scope of any measures, as well as sufficient lead in time for businesses to adjust.*

*Our members believe that single-use plastic sachets have a purpose and place in the market. This is particularly the case when consumers get to experiment with a product rather than buying a full format. For cosmetic purposes for example, single-use plastic sachets that contain a small quantity enable people to experience the product and decide whether to purchase it. This helps with product wastage prevention.*

*Finally, we encourage Defra to explore to what extent the single-use plastic sachets could be covered by modulated fees under the new packaging EPR regulations.*

**18. Are you aware of any alternatives to single-use plastic sachets? Do you have any evidence to support that these alternatives are more environmentally friendly than single-use plastic sachets?**

*We are not aware of any sustainable alternatives to plastic sachets and switching from one form of single use packaging to another can result in higher environmental impacts. Should there be any alternatives to single-use plastic sachets, we have the following reservations:*

- *Can alternatives be extended to all applications and at the needed scale*
- *technical limitations of alternatives: product safety, hygiene consideration*
- *Environmental footprint of alternatives: overall life cycle assessment needed to evidence that they provide better environmental outcomes*
- *The main challenge is the incorrect disposal (littering): items need to be captured and recycled, regardless of material*

**19. Do you support consulting on introducing a ban of single-use plastic sachets used for:**

- Food and drink: permanent food outlets including restaurants and cafes, and sachets provided with ready meals
- Food and drink: mobile outlets including trains, airplanes, food trucks
- Beauty industry: providing free samples at the point of sale or single-use quantities provided within a multipack
- Support all of the above
- Do not support any of the above**
- Please give any evidence to support your views

**20. Do you support consulting on introducing a charge on single-use plastic sachets used for:**

- Food and drink: stationary outlets including restaurants and cafes
- Food and drink: mobile outlets including trains, airplanes, mobile food vendors
- Beauty industry: providing free samples at the point of sale
- Support all of the above
- Do not support any of the above**
- Please give any evidence to support your views

**21. Are you aware of any other uses of single-use plastic sachets that could be considered for banning or introducing a charge on?**

*No comment -*

**22. Are you aware of any uses or situations in which the use of sachets is essential and could be considered for exemptions in any future legislation? What is the evidence in support of your view?**

*We do not believe that any future legislation specifically on the use of sachets is needed at this point. The BRC and its members support a holistic and comprehensive policy approach is required for the end-of-life management of single-use plastic products across the industry and across the UK.*

We would urge DEFRA to continue to develop and fully implement the 'Collection and Packaging' Reform proposals which will have implications for the wider packaging and product-packaging goods.

Furthermore, there is already great progress happening on an industry-led voluntary basis under the WRAP's Plastics Pact, which the BRC is a supporter of. Some of our members are signatories of the Pact's targets by 2025, one of them being the elimination of problematic and unnecessary plastic items.

## SINGLE-USE CUPS

**23. Would you support the government consulting on a proposal to introduce a charge for single-use cups?**

Yes

No

Don't know

Please give reasons and supporting evidence.

*The BRC shares the Government's ambition to increase recycling rates and tackle litter through a comprehensive and coherent policy framework that builds collection (on-the-go and kerbside) and recycling infrastructure for all most commonly used products and materials, including single use cups. However, we do not believe that introducing a charge for all single-use cups is the most appropriate measure and would prefer that the industry retains the ability to choose whether to charge or not the customers.*

*The BRC and its members believe that a holistic and comprehensive policy approach is required for the management of packaging waste across the industry and across the UK. We would urge DEFRA to continue to develop and fully implement the 'Collection and Packaging' Reform proposals rather than targeting specific types of food and drink packaging. Our members are concerned about the cumulative effect of the proposals in light of the changing framework on packaging. The cost to industry, and especially to hospitality, of different regulations coming in at once is significant, in addition to the already existing pressures caused by the pandemic, Brexit and wider taxation (business rates).*

*We recommend the Government to deliver the promised reform on time, let the industry implement it, and assess the outcomes before introducing any simultaneous measures. For example, the impacts of the packaging EPR fee modulation are expected to affect the amount of the packaging placed on the market and subsequently its consumption by consumers, ultimately driving the industry and the consumers towards more sustainable (reusable and refillable) and recyclable options and delivering a potential reduction in single-use items like cups.*

***If the Government intends to introduce a charge applicable across the industry, our members would welcome further engagement and discussion so that the measure does not disproportionately affect customers and distorts competition within the concerned businesses in England.***

*BRC members strongly recommend that the Government provides enough lead in time for businesses to get ready for the implementation of the measure (operational and administrative considerations) and that it takes full ownership and lead on setting up early consumer communication and awareness campaigns.*

**24. Do you think this charge should be for both hot and cold drinks?**

- Yes  
 **No**  
 Don't know

Please give reasons and supporting evidence.

*We do not believe that introducing a charge for all single-use cups for both hot and cold drinks is the most appropriate measure and would prefer that the industry retains the ability to choose whether to charge or not the customers.*

*If the Government intends to introduce a charge applicable across the industry, our members would welcome further engagement and discussion so that the measure does not disproportionately affect customers and distorts competition within the concerned businesses in England.*

*Our members know that customers are price sensitive. Our recent Future Consumer Index ([BRC/EY Future Consumer Index, September 2021](#)) revealed that only very few individuals will say they do not desire to behave more sustainably but when you introduce competing priorities like price and convenience sustainable behaviours often do not feature in the eventual outcomes.*

*With this in mind, if we are to deliver the desired outcomes (i.e. better recycling and less littering) it is important to fully understand consumers' attitude to levies, bearing in mind the divide between intention and action. **We would recommend DEFRA to undertake a comprehensive UK-wide survey on consumers perception and reaction to a charge on both hot and cold drinks.** We would recommend giving due consideration to consumers' reaction to the cumulative effect of the measures, if a levy were to be introduced and paid by them. **From our members experience, people don't respond well to any new charges or levies that affect the running and costs of their everyday life (ex: mandatory wearing of masks in shops), especially in a context where the cost of the weekly food basket and the wider costs of living are skyrocketing.***

*Finally, our members wish to underline **the critical issue of abuse of shop workers.** This is a genuine issue that the industry is continuously facing. Our members' front-line workers are dealing with an alarming level of frictions on a daily basis which is likely to intensify should the wider public not be fully aware of the introduction of a charge on single-use cups, why it is being introduced and by whom.*

*The BRC would expect the Government to take full ownership of what could potentially be an unpopular measure and guarantee that a solid communication campaign is undertaken early enough to raise citizens' awareness.*

**25. Do you think this charge should apply to businesses of all sizes?**

- Yes**  
 No  
 Don't know

Please give reasons and supporting evidence.

*We do not believe that introducing a charge for all single-use cups is the most appropriate measure and would prefer that the industry retains the ability to choose whether to charge or not the customers.*

*If the Government intends to introduce a charge applicable across the industry, our members would welcome further engagement and discussion so that the measure does not disproportionately affect customers and distorts competition within the concerned businesses in England.*

*If the Government wishes to introduce an effective policy measure, there needs to a coherent approach from the start so that there is a level-playing field among the concerned businesses. All businesses currently selling the items in scope (single-use cups) should be obligated, regardless of their size, in order to achieve the desired impacts (high rates of recovery and recycling, reduce littering).*

*The regulatory intervention should be consistent especially as the independent coffee shops operating across the UK are taking up a large and growing portion of the market share. In 2019 alone, the number of independent operators and branded coffee chains increased, reaching 7,066 and 8,222 shops respectively ([source](#)). By obligating businesses of all sizes, the policy would preserve a level playing field.*

*Given that two-thirds of the cups placed on the market are from outside the National Cup Recycling Scheme membership, allowing certain businesses who sell single-use cups to be exempt from the charge would undermine the effectiveness of the regulatory measure from the start and further distort the market.*

**26. Are you aware of any situations where the use of a single-use cup is essential and could be considered for exemptions from the charge in the future? E.g., because of business location, business type, type of product in the cup. Please give reasons and supporting evidence.**

*We do not support the introduction of a charge on single-use cups and believe that the industry should retain the ability to choose whether to charge or not the customers, regardless of the situation or settings.*

#### ADDITIONAL ITEMS

**27. Please state any further single-use plastic items that you think should be considered for targeted future policy actions, and your reasons for this.**

*No comment -*

**28. Regarding any additional items that you have provided, are you aware of any environmentally friendly alternatives that could be used instead?**

*No comment -*

## REUSE AND REFILL

### 29. What are the barriers to reuse and how could they be addressed? Please provide any supporting evidence.

*The BRC is supportive of the Government's ambition to improve products' resources efficiency and their overall environmental performance and footprint. We support the development of reuse and refill solutions and offers across the UK retail industry when and where possible.*

*When it comes to packaging reuse, many of our members are signatories of the UK Plastics Pact and are committed to the Pact's targets, including 100% of plastic packaging to be reusable, recyclable or compostable by 2025 (target 2). The latest [Annual Report](#) of the Plastics Pact reported good progress on the levels of reusable packaging and that despite the unprecedented pressures the retail industry has been facing due to Brexit, various supply-chain shortages and the Covid-19 pandemic. As such there are high levels of reuse in transit packaging but an acknowledgment that more needs to be done for primary packaging (see page 8).*

*From an industry perspective, **our members are open to the idea of making reuse more mainstream, offering more reusable products they sell, using less, better designed and more recyclable, reusable packaging, and rewarding consumers who chose to use a reusable cup.** Retailers have a privileged relationship with their customers and understand that offering reusable solutions and options for Fast-Moving Consumer Goods (FMCG) can have a positive effect on their reputation as a brand, drive loyalty, offer a new user experience, and drive consumer engagement.*

*We are aware that the trials to incentivise reuse and refill have not always delivered the scale and uptake we'd hoped for (for example: some trials focused on reuse have a successful initial uptake but then the participation falls (ex: initial 3,5% conversion rate, slowly dropping to 1.1% after 4 months - overall pilot average at ~2% with 50% return rate)*

*We have identified the following barriers:*

- *Consumer uptake has not grown accordingly: gap between enthusiasm/intention/action once measures are disrupting busy daily lives*
- *Consumers' convenience-driven lifestyles attitudes*
- *Hygiene aspect / Food safety regulations –challenges in accepting reusable receptacles in food settings => It is worth flagging a [guidance from the Food Safety Authority of Ireland](#) in relation to reusable containers and cups, which indicates that business could be liable if a customer became ill as a result of the overall hygiene within the business, which could potentially be due to accepting reusable containers and cups that were not clean or in good condition (e.g. cracked or chipped). For many businesses and consumers, trust in a high level of hygiene has been particularly key during the pandemic, and many outlets stopped using their own containers due to handling risks.*
- *There needs to be one common understanding of how reuse is defined/measured/calculated/accounted for across the UK Government (Defra/BEIS/HMRC), including the Devolved Administrations and Regulators*
- *Bear in mind the different approaches to reuse from different various industries and sectors. Sector specificities are important – different approaches to reuse in a food/non-food settings*
- *Retailers can only act as far as their own-brand/labelled items are concerned, limited influence over third-party brands – although there are continuous open dialogue and collaborations*
- *Businesses have a high upfront investment (e.g. to purchase reusable packaging, set up*

washing facilities etc.) and operational costs (reverse logistics, collection, inspection activities etc.), and a clear need for scale

- Commercial viability

**30. What are the barriers to refill and how could they be addressed? Please provide any supporting evidence.**

The latest Annual Report of the Plastics Pact reported good progress and outlined the various reuse and refill trials that our members have been undertaking.

From an industry perspective, **our members are open to the idea of making refill more mainstream.** We are aware that the trials to incentivise reuse and refill have not always delivered the scale and uptake we'd hoped for. To unlock the full potential of refill for citizens, the following barriers need to be addressed:

- Consumer uptake has not grown accordingly: gap between enthusiasm/intention/action once measures are disrupting busy daily lives
- Consumers' convenience-driven lifestyles attitudes
- How to preserve consumers' engagement and buy-in
- Hygiene aspect / Food safety regulations
- There needs to be one common understanding of how refill is defined/measured/calculated/accounted for across the UK Government (Defra/BEIS/HMRC), including the Devolved Administrations and Regulators
- Bear in mind the different approaches to refill from different various industries and sectors. Product specificities are important – different approach to refill in a food/non-food angle
- Retailers can only act as far as their own-brand/labelled items are concerned, limited influence over third- party brands – although there are continuous open dialogue and collaborations as seen in the 2021 Plastics Pact annual report
- Businesses have high upfront investment and operational costs (reverse logistics, collection, inspection activities etc.), and a clear need for scale.
- Commercial viability

**31. How can government incentivise increased reuse and refill?**

- Support investment in R&D and product and packaging innovation
- Facilitate trials
- Make available funds/grants for various refill/reuse initiatives
- Education piece, especially in schools
- Nation-wide campaigns incentivising and raising awareness but also educating that in no instances should reuse/refill options be used as single-use

**32. How could businesses incentivise customers to support reuse and refill?**

- Adopt a business/corporate position on reuse/refill (brand reputation)
- Develop consumer focused marketing and advertisement around reuse and refill
- Expand trials and their scale to deliver a new user experience whilst making it 'an experience'
- Work on competitive reuse/refill offerings that would be attractive consumers from a price

*point perspective*

- *Explore various incentives/rewards/discounts to support consumers who would embrace reuse and refill*
- *Develop a strategy (and subsequent offerings and communication) that would help customers/shoppers to create a reuse/refill habit and ultimately make that habit stick*

**30. Please provide information about any successful case studies of reuse and refill.**

*Please see the various reuse and refill case studies outlined in the WRAP's Plastics Pact 2021 Annual Report.*

**31. Would you support the government consulting on regulating that restaurants cannot provide customers with any single-use products in eat-in settings? The existing exemption for straws would remain.**

- Yes
- No
- Don't know