

Plastic Cotton Bud Submission

Consultation Response Report

July 2018

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1. Introduction and background

Introduction

Marine litter is a global challenge, affecting the world's oceans, seas, coastlines and shores. It is defined as any solid material which has been deliberately discarded or unintentionally lost on beaches, shores or at sea, including materials transported into the marine environment from land by rivers, draining or sewage systems or winds¹. The problem is largely caused by a range of very slowly degradable material such as plastics, metals and glass. The most commonly found litter at sea and washed ashore is plastic²³.

Marine plastics have a negative impact on our marine environment, our economy and they threaten human health. Larger plastic items in our seas can entangle animals, smother habitats, damage tourism and pose a serious risk to life and livelihood by causing breakdown of vessels at sea. As a result of sunlight and wave exposure, plastics become fragmented, making their way into the marine ecosystem by ingestion, consumed by creatures as small as plankton to as large as sea mammals. Plastic fragments cause obstruction and physical damage to the digestive tracts of animals which eat them and can result in death, plastics may also act as a vector for contaminants. Toxins such as Polycyclic Aromatic Hydrocarbons (PAHs), Polychlorinated Biphenyls (PCBs) and Polybrominated Diphenyl Ethers (PBDEs) and metals such as lead, copper and cadmium can accumulate in plastics⁴⁵⁶⁷.

Tackling marine litter requires governments, industry and communities to reduce the amount of litter entering the marine environment from land and sea-based sources and to also remove litter that is already there. The Scottish Government published its Marine Litter Strategy⁸ in 2014 which aims to develop current and future measures to ensure that the amount of litter entering the marine and coastal environment is minimised to bring ecological, economic and social benefits. In addition to over 40 action points in this Strategy, the Scottish Government has prioritised action on plastics with four commitments in its Programme for Government⁹;

¹ <http://www.ospar.org/documents?v=34422>

² <https://oap.ospar.org/en/ospar-assessments/intermediate-assessment-2017/pressures-human-activities/marine-litter/composition-and-spatial-distribution-litter-seafloor/>

³ <https://mcsuk.org/clean-seas/great-british-beach-clean-2017-report>

⁴ Mato, Y., Isobe, T., Takada, H., Ohtake, C. and Kaminuma, T. (2001) plastic resin pellets as a transport medium for toxic chemicals in the marine environment. *Environmental Science and Technology*, 35(20), 318-324

⁵ Andrady, A.L., 2011. Microplastics in the marine environment. *Marine Pollution Bulletin*, 62, 1596-1605

⁶ Rochman, C.M, Hoh, E., Hentschel, B.T., Kaye, S. (2013) Long-term field measurement of sorption of organic contaminants to five types of plastic pellets: implications for plastic marine debris. *Environmental Science & Technology*, 130109073312009. Doi:10.1021/es303700s

⁷ Rochman, C.M, Hentschel, B.T., Teh, S.J., (2014), Long-term sorption of metals is similar among plastic types: implications for plastic debris in aquatic environments. *PLOS ONE* 9(1); e85433

⁸ <http://www.gov.scot/Publications/2014/09/4891>

⁹ <http://www.gov.scot/Publications/2017/09/8468>

- Introducing a Deposit Return Scheme for drinks containers
- Establishing an expert panel to consider actions to reduce the demand for single-use items
- Hosting an international conference to discuss improving our marine environment and protecting our wildlife, focusing on marine plastics
- Committing £500,000 to begin to address litter sinks around the coast and to develop policy to address marine plastics, which will involve working with community groups.

We want to deliver on the commitment to develop policy to address marine plastics with new legislation to take action on one of Scotland's most common pieces of beach litter, plastic-stemmed cotton buds. The Cabinet Secretary for Environment, Climate Change and Land Reform announced the intention to introduce a ban on the manufacture and sale of plastic-stemmed cotton buds on 11 January 2018.

Background

Plastic cotton buds are contributing to the global marine plastic problem, damaging the marine environment, increasing risk to public health from contact on beaches and bathing waters and risking health further when fragments of plastic enter the food chain. They are in our seas because people are continuing to flush them down toilets and sewage treatment works cannot prevent all of them reaching the sea. When entering sewage systems the plastic stems do not settle with organics, their buoyancy allows them to flow through plant equipment and their narrow diameter means they are not caught by all screens.

Plastic cotton bud stems are consistently observed to constitute approximately 5-10% of marine debris surveyed in European seas¹⁰. The Marine Conservation Society has been monitoring the levels of cotton buds found on beaches in the UK since 2004. They continue to feature in the top ten most common marine litter items in beach clean surveys with an average of 27 for every 100m of beach surveyed in 2017¹¹.

¹⁰ Arcadis (2014) – [Marine Litter study to support the establishment of an initial quantitative headline reduction target](#). Report to European Commission DG Environment SFRA0025: Surfrider Europe (2015) [Bilan Environnemental des Initiatives Océanes 2015 Summary report](#)

¹¹ Marine Conservation Society (2017) [Great British Beach Clean Report](#) published 30 November 2017

Previous actions to tackle the issue

Multiple campaigns have targeted consumer behaviour to encourage people to stop using their toilets as rubbish bins for many litter items, including cotton buds. These campaigns include Scottish Water's "Bag it and Bin it"¹² and "Keep the water cycle running smoothly"¹³ and the Marine Conservation Society's "The Unflushables"¹⁴ which highlights the problem of sewer abuse. Product labelling to encourage responsible disposal has also been used by many brands. Historic campaigns have not resulted in any long-term measurable reduction in the number of cotton buds being flushed down toilets and washing up on beaches.

Fidra, a Scottish environmental charity, has worked with manufacturers and retailers to encourage a change from plastic-stemmed cotton buds to biodegradable alternatives. They have focused on changing the material from which cotton buds are made making them less likely to escape through waste water systems and reduce the unnecessary use of plastic material. Substitute stems are made from fully natural materials such as paper which is preferably Forest Stewardship Council accredited. Their "Cotton Bud Project"¹⁵ has had great success with many retailers including the largest supermarkets and the major manufacturer Johnson & Johnson Ltd committing and changing to the non-plastic option. While the action of these retailers and suppliers is to be applauded, plastic-stemmed cotton buds are still currently available to buy in Scotland.

Rationale for the proposal

The Scottish Government proposes to introduce legislation which bans the manufacture and sale of plastic-stemmed cotton buds based on the evidence summarised in this paper, namely

- Plastics in our seas harm our marine environment.
- Plastic-stemmed cotton buds are contributing to this problem and are one of the most commonly found items of plastic litter washed up on our shores.
- Campaigns to promote behaviour change have failed to stop the irresponsible disposal of these items down toilets.
- The 'Cotton bud project' has demonstrated that manufacturers and retailers are able to trade in viable biodegradable alternative products and there is therefore no known reason as to why other companies would be unable to follow this best practice.

¹²<http://www.scottishwater.co.uk/you-and-your-home/your-home/flooding-information/flooding-information-documents/bag-it-bin-it-leaflet>

¹³<http://www.scottishwater.co.uk/you-and-your-home/your-home/keep-the-water-cycle-running-smoothly>

¹⁴ <http://www.wetwipesturnnasty.com/>

¹⁵ <https://www.cottonbudproject.org.uk/>

The Consultation Paper

The consultation paper presented the background information and questions inviting views about the potential environmental and economic impacts of banning plastic-stemmed cotton buds.

In line with its stated commitment to encouraging public participation in the debate on plastic-stemmed cotton buds, the Scottish Government took a number of steps to make information about the consultation widely available. This included sharing the online link with stakeholders, posting the link on social media and Cabinet Secretary references to the consultation in the media.

The consultation contained the following ten questions, the first two were to inform the decision making process with regards to the proposed legislation, the remaining questions were to provide supporting metadata:

Question 1: Do you support the proposal to introduce a ban on the manufacture and sale of plastic-stemmed cotton buds in Scotland? (Please give reasons)

Question 2: If you are responding as a business, can you provide supporting evidence of any expected additional costs from this proposed ban?

Question 3: Are you content for the Scottish Government to contact you for further clarification of the financial effects that you have estimated?

Question 4: What is your name?

Question 5: What is your email address?

Question 6: Are you responding as an individual or an organisation?

Question 7: Sector and Origin: It would be helpful for our analysis if you could indicate which of the sectors you most align yourself/your organisation with for the purpose of this consultation (please tick one which is most applicable to you)

Question 8: What is your organisation?

Question 9: The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference

Question 10: We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

About the analysis

As seen in Chapter 2, this consultation attracted 847 responses. It is important to bear in mind, however, that by their very nature, public consultations are not necessarily representative of the views of the wider population. Anyone can submit their views, and individuals (and organisations) who have a keen interest in a topic – and the capacity to respond – are more likely to participate in a consultation than those who do not. This self-selection means that the views of consultation participants cannot be generalised to the wider population.

For this reason, the approach to consultation analysis tends to be qualitative in nature. Its main purpose is not to identify how many people held particular views, but rather to understand the range of views expressed.

Basic frequency analysis has been carried out to report the numbers and types of responses received. Chapter 3 gives an overview of the responses in the conclusions section.

2. About the respondents and responses

This chapter presents information about the respondents and types of responses received by the consultation. It also describes the way in which responses were received, and provides a brief description of the campaign which encouraged and helped to facilitate the submission of responses from their members / supporters.

How responses were received

Responses to this consultation were received in two formats;

Online submission

Respondents could submit an online response by completing the response form hosted on the Scottish Government's Citizen Space consultation hub.

Submission through an organised campaign

A campaign group, Friends of the Earth, co-ordinated responses among their members and supporters. These 'campaign responses' were based on a standard text provided by the campaign organiser. They were submitted to the Scottish Government through a form on the campaign organiser's website. Completion of the online form resulted in a respondent's comments being sent by email to the Scottish Government. Respondents could simply add their name and contact details to the standard response, and then send their message. Such responses are referred to in this report as '**standard campaign responses**'. Alternatively, respondents could edit the standard campaign response or add their own comments. These personalised responses, submitted via a campaign, are referred to in this report as '**non-standard campaign responses**'.

Number of responses included in the analysis

Altogether, the consultation received 847 submissions. Following the removal of blank, invalid or duplicate responses, or multiple responses from a single individual, 830 responses remained, thus, the analysis was based on these 830 responses, comprised of;

570 campaign responses, (45 non-standard and 525 standard responses)
260 on-line Citizen Space responses

About the respondents

The majority of respondents were individuals, 803, (97%). The remaining 27, (3%), respondents represented organisations. The full list of organisations are listed in Annex A.

Organisations fell into three categories, the largest of which was the third sector/voluntary sector of which the majority have an environmental focus.

Third sector / Non-Governmental Organisations 70%
Public and Statutory Bodies 15%
Commercial 15%

Geographic location of respondents

The location of respondents was not requested in the online citizen-space consultation hub, however those that responded as part of the Friends of the Earth campaign provided a postal code. Of these 532 (93%) respondents were from Scotland, 33 (6%) were from other parts of the UK and 5 (1%) were from elsewhere.

Responses to individual questions

There were 830 responses to the consultation, however not all respondents answered all the consultation questions, as those following the main question regarding support of the proposal to legislate were not relevant to each respondent.

All respondents answered the first question regarding their support of the proposal to ban plastic-stemmed cotton buds. 7 respondents replied to the second question regarding any additional costs to business.

3. Results

Question 1: Do you support the proposal to introduce a ban on the manufacture and sale of plastic-stemmed cotton buds in Scotland? (Please give reasons)

All respondents answered this question.

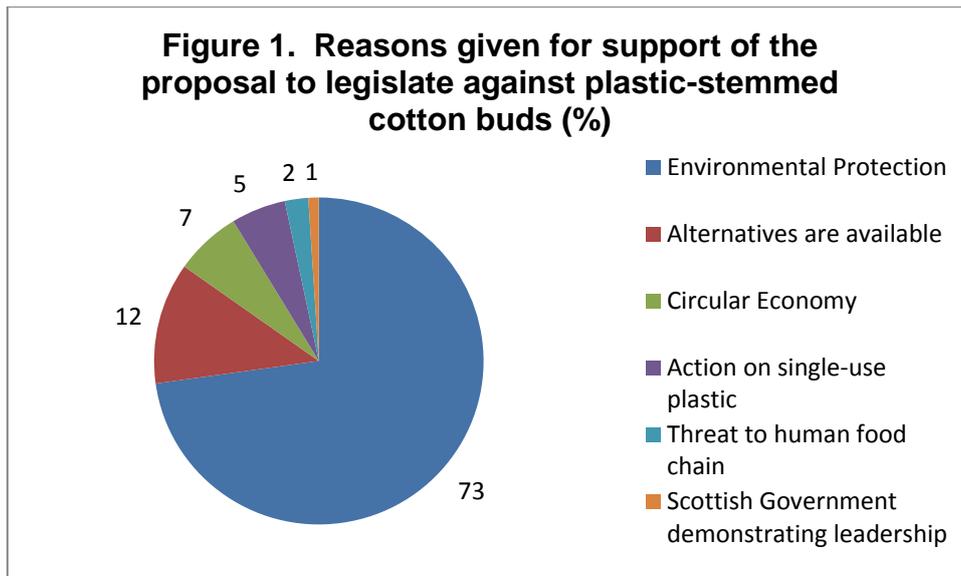
Yes – 825 (99.4%)

No – 5 (0.6%)

Reasons given for supporting the proposal

- Environmental protection (73%)
 - Many respondents referred to first-hand experience of seeing these products littering beaches. They were aware of their harm to seabirds and the issue of marine plastics in general, with many referring to the “Blue Planet” programme.
- Alternatives are available (12%)
 - Respondents were aware of the paper and bamboo alternatives that were readily available on the market.
- Circular Economy (7%)
 - Respondents believe the legislation promotes better use of resources to improve the circular economy.
- Sets a precedence for action on single-use plastics (5%)
 - Cotton buds were seen as part of the wider issue of single-use plastic items, a problem which needs to be addressed.
 - Respondents see this as the first step in legislative action against all single-use plastics
- Threat to the human food chain (2%)
 - Plastic-stemmed cotton buds were seen as contributing to the plastic pollution of seas which could affect the human food chain.
- Scottish Government demonstrating leadership (1%)
 - Some respondents referred to the need for Government to demonstrate leadership in order to encourage others to follow suit to help tackle marine litter at a global level.

The proportion of reasons to support this proposal, as stated by respondents, is laid out in Figure 1.



Reasons given for not supporting the proposal

All five of the respondents who stated they did not support the proposal to ban the manufacture and sale of plastic-stemmed cotton buds did so as individuals. One checked the “no” box erroneously and gave reasons for support of the proposal. Of the remaining respondents, three considered the focus should be on behaviour change to stop people flushing inappropriate items down toilets, rather than ban the item itself. The remaining respondent did not consider introducing new legislation to be a good use of Government time.

Question 2: If you are responding as a business, can you provide supporting evidence of any expected additional costs from this proposed ban?

7 respondents replied to this question as business owners and as a statutory body, Scottish Water. No business owner stated that they expected any additional costs as a result of the proposed legislation.

Scottish Water did not provide clarification on the issue of any potential additional costs, but did refer to the financial burden associated with the removal and disposal of plastic stems to landfill.

4. Conclusions

The number of respondents, 830, has allowed conclusions to be drawn from this consultation exercise. Most respondents were individuals, however the inclusion of public bodies, businesses and non-governmental organisations gives a breadth of representation on this issue.

The vast majority of respondents, both individuals and organisations, support the proposal to introduce a ban on the manufacture and sale of plastic-stemmed cotton buds, 99.4%. The main reasons given for support were for the protection of our marine environment (73%) and the availability of alternatives products (12%). The consultation did not raise concerns regarding any potential additional costs to businesses as a result of the proposal.

Issues raised

- **Alternatives to plastic-stemmed cotton buds**

Respondents stated caution that bioplastics should also be covered by proposed legislation.

Response: In the consultation document the scope of the proposed legislation is listed and classifies plastic as a synthetic polymeric substance that can be moulded, extruded or physically manipulated into various solid forms that retains its final manufactured shape during use in its intended applications. The proposed ban would therefore cover bioplastics.

Respondents were also concerned that alternatives to the plastic-stemmed products should be sustainably sourced.

Response: In the consultation document there is reference to substitute stems which are made from fully natural materials such as paper which is preferably Forest Stewardship Council accredited. This will be something that is referenced in draft Legislation.

- **Criticism of the consultation**

There was criticism of the consultation by 21 of 830 respondees. They considered the number of requests for metadata; name, email address etc. to outweigh the questions regarding the proposal.

Response: Metadata is required for any consultation and cannot be avoided.

The other criticism of the consultation was that it did not go far enough in addressing other single-use plastic items.

Response: This consultation was never intended to address any subject other than measure support for the proposal to legislate.

Annex A

List of Respondents

Individuals (803, 97%)

Organisations (27, 3% of total)

Public and Statutory Bodies

Aberdeen City Council
East Lothian Council
North Ayrshire Council
Scottish Water

Commercial

Boots UK
TWEFDA Ltd
Two Scots Abroad
Waitrose

Third sector / Non-Governmental Organisations

ASH Scotland
Citizens Advice Scotland
CIWM Scotland Centre
Community of Arran Seabed Trust
Fauna and Flora International
Fidra
Friends of Troon Beaches
Green Economy Coalition
Keep Scotland Beautiful
KIMO International
Marine Conservation Society
Humanism in Scotland
North Western Inshore Fisheries and Conservation Authority
Plastic Free WD
RSPB Scotland
Scottish Environment LINK Economics Group
Shetland Amenity Trust
The Association for the Protection of Rural Scotland
The National Trust for Scotland



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