

# **Introducing Market Restrictions on Problematic Single-Use Plastic Items in Scotland**

**Islands Communities Screening Assessment**

**October 2020**



**Scottish Government**  
Riaghaltas na h-Alba  
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## **Introduction**

1. The Scottish Government is committed to tackling our throwaway culture, in line with the vision set out in *Making Things Last*<sup>1</sup>. Action has already been taken to place market restrictions on plastic microbeads and plastic-stemmed cotton buds in Scotland and the Scottish Government is now looking to go beyond this to address additional items. This screening assessment therefore considers the potential impacts on Islands Communities of a restriction of the following single use plastic products:

- Single-use plastic cutlery (forks, knives, spoons, chopsticks);
- Single-use plastic plates (plates, trays/platters, bowls);
- Single-use plastic straws;
- Single-use plastic beverage stirrers;
- Single-use plastic balloon sticks;
- Single-use food containers made of expanded polystyrene;
- Single-use cups and other beverage containers made of expanded polystyrene, including their covers and lids;
- All oxo-degradable products.

2. These items are included in Article 5 (restrictions on placing on market) of the EU Directive on the reduction of the impact of certain plastic products on the environment (2019/904) (“the Single-Use Plastics Directive”).

3. The following definitions, taken from the Directive are applied to this Islands Communities Screening assessment:

- ‘plastic’ means a material consisting of a polymer as defined in point 5 of Article 3 of Regulation (EC) No 1907/2006, to which additives or other substances may have been added, and which can function as a main structural component of final products, with the exception of natural polymers that have not been chemically modified;
- ‘single-use plastic product’ means a product that is made wholly or partly from plastic and that is not conceived, designed or placed on the market to accomplish, within its life span, multiple trips or rotations by being returned to a producer for refill or re-used for the same purpose for which it was conceived;
- ‘oxo-degradable plastic’ means plastic materials that include additives which, through oxidation, lead to the fragmentation of the plastic material into micro-fragments or to chemical decomposition

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<sup>1</sup> [Making Things Last: a circular economy strategy for Scotland](#)

## **The Islands (Scotland) Act 2018**

4. The Islands (Scotland) Act 2018 provides for a new duty on the Scottish Ministers and other relevant public bodies that they must have regard to island communities in exercising their functions and in the development of legislation.

5. Section 13 of the 2018 Act obliges Scottish Ministers to prepare an Islands Communities Impact Assessment (ICIA) in relation to legislation which, in their opinion, is likely to have an effect on an island community which is significantly different from its effect on other communities in Scotland.

6. Section 13 of the 2018 Act states that an ICIA must:

- describe the likely significantly different effect of the legislation;
- assess the extent to which the Scottish Ministers consider that the legislation can be developed in such a manner as to improve or mitigate, for island communities, the outcomes resulting from the legislation; and
- set out the financial implications of steps taken under this subsection to mitigate, for island communities, the outcomes resulting from the legislation.

## **Framing**

7. This document seeks to identify whether there are issues which merit further exploration through an Islands Communities Impact Assessment. If issues are identified, a full Islands Communities Impact Assessment will be carried out.

8. The Islands (Scotland) Act 2018 lists the following areas that are relevant considerations for islands and islands communities:

- Depopulation
- Economic development
- Environmental protection
- Health and wellbeing
- Community empowerment
- Transport
- Digital connectivity
- Fuel poverty
- Land management
- Biodiversity

9. Previous Islands Communities Impact Assessments have identified that islands communities face unique challenges around waste management due to the increased distances involved.

## **Methodology**

10. Desktop research was undertaken to identify whether there was any existing evidence of the impacts associated with a restriction of the single-use plastic items in question being different for islands communities. This was intended to identify issues for further investigation.

11. This desktop research was then supplemented by identification of relevant issues that have been raised in previous Islands Communities Impact Assessments.

12. In addition, representatives from local authorities whose remits are partially or wholly island based were offered the opportunity to discuss their thoughts with Zero Waste Scotland. These conversations were intended to better understand the impacts that were identified by the initial research and to draw out any other issues that were not previously identified.

13. Discussions took place with five of the six island authorities. These were Comhairle nan Eilean Siar, Shetland Islands Council, Orkney Islands Council, Argyll & Bute Council and North Ayrshire Council. In addition, a discussion took place with a representative from Highlands and Islands Enterprise.

14. For each conversation, representatives were provided with an opportunity to discuss their concerns about the impact of the proposed market restrictions on their communities and the unique challenges faced by island communities.

### **Key findings**

15. Desktop research has identified little existing evidence to suggest the impact of a restriction on the single-use plastic products in question is significantly different for islands communities.

16. Previous Islands Communities Impact Assessments and conversations with local authorities and Highlands and Islands Enterprise identified four potential issues:

- Impact on waste collections: Island authorities face high costs in providing household recycling services due to the increased distances involved. This is particularly problematic for plastics as these are low density, so a relatively small amount of material takes up a lot of space. As a result, a reduction in this type of waste may be of benefit to island authorities
- Marine litter: The restriction on the listed single-use plastic items is intended to reduce the amount of plastic marine litter and so should result in a reduction in plastic beach litter.
- Use of alternative items on ferries: It was highlighted that use of reusable replacements for single-use plastic items, such as conventional mugs, may be more challenging in ferry settings.
- Access to alternatives: It was highlighted that alternatives may be more expensive for island communities

17. These are explored in further detail below.

### **Impact on waste collections**

18. Two of the local authorities noted that restricting the listed single-use plastic items would be beneficial in terms of their waste collections. This was because the lightweight nature of plastic waste means that it is expensive to transport and the greater distances involved for island authorities exacerbate this issue.

19. In addition, for more remote island communities, kerbside recycling can still be limited or non-existent, so recycling of plastics is limited. Some authorities also noted that they bale their plastic waste which reduces the price that they can get for it, further impacting on the cost of the service.

20. It must be acknowledged that this proposal only targets single-use plastic items, so it is possible that many items will be replaced with non-plastic single-use equivalents. It is unclear whether there would be any overall reduction in waste, or simply a shift in composition. As a result, it is unclear whether there would be any reduction in waste management costs.

21. As a further issue, concerns were raised about compostable alternatives replacing single-use plastic items as local facilities may not be able to treat these. This could result in significant transport costs to achieve disposal or reprocessing. Whether this becomes a problem is dependent on the replacements adopted for the single-use plastics items in question. It was noted that a shift to reusable items would reduce waste and so would be preferable.

### **Marine Litter**

22. The European Union Impact Assessment<sup>2</sup> lists cutlery, straws, stirrers, drinks cups and cup lids, balloon sticks and food containers among the top ten single use plastic items found on beaches. A restriction on these items could therefore improve the coastal environment, benefitting island communities.

23. Recent work by Marine Scotland<sup>3</sup> indicated that local litter sources dominate plastic inputs to Scottish coastal areas, so local litter reduction actions can reduce marine plastics. Previous work by Zero Waste Scotland has indicated that plastic represents 20% of all terrestrial litter in Scotland<sup>4</sup>. In addition, plastic/polystyrene materials (0-50cm) were the most commonly found item on UK beaches during the Marine Conservation Society's 2019 Great British Beach Clean<sup>5</sup>. It is therefore anticipated that a restriction on single-use plastic items will result in a decrease in new plastic beach litter.

### **Use of alternative items on ferries**

24. It was highlighted that the use of reusable products on ferry services may be more challenging to implement for safety reasons.

25. However, it should be noted that the restriction of single-use plastic versions of a product does not prevent ferry operators from switching to alternative single-use items if reuse models prove impractical.

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<sup>2</sup> [COMMISSION STAFF WORKING DOCUMENT IMPACT ASSESSMENT Reducing Marine Litter: action on single use plastics and fishing gear Accompanying the document Proposal for a Directive of the European Parliament and of the Council on the reduction of the impact of certain plastic products on the environment](#)

<sup>3</sup> [Marine Scotland topic sheet 151](#)

<sup>4</sup> [Scotland's Litter Problem: Quantifying the scale and cost of litter and flytipping](#)

<sup>5</sup> [Great British Beach Clean, 2019 Report](#)

### **Access to alternative items**

26. There were mixed views on whether access to alternative items would pose challenges for island communities. A concern was raised that the longer supply chains to islands and the fact that islands do not have the bargaining power of larger population centres may increase costs.

27. However, another respondent noted that wholesalers would simply switch to supplying alternative products, and that these are already available due to local demand. This was therefore not felt to be a significant issue.

28. As this policy would restrict access to the single-use plastic items in question, it is anticipated wholesalers would switch what they supply, meaning that alternative items would become mainstream. It therefore seems likely that any cost increase as a result of product changes would be the same as for mainland communities, although the overall cost may remain higher due to transport costs.

### **Next steps and conclusions**

29. This screening assessment has identified four initial issues. These are focussed on:

- Waste collections, where the potential impact is unclear.
- Marine litter, where the impact is expected to be positive.
- Use of alternatives on ferries, where a significant impact has not been identified at this stage.
- Access to alternatives, where any impact is not likely to be unique to island communities.

30. As the scope of the engagement undertaken to date is relatively small, we are keen to carry out further engagement to ensure any issues are fully addressed, and any necessary mitigating measures can be considered. It is therefore our intention to develop a full assessment whilst the formal consultation is ongoing.

31. To support this process and ensure that island communities are represented, Zero Waste Scotland will be carrying out targeted engagement to provide an opportunity for island organisations, communities and businesses to contribute.

32. During this process, we welcome views on the issues discussed above, or any issues that we have not yet identified.

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