

Rt Hon Thérèse Coffey MP
Secretary of State for Environment, Food and Rural Affairs
Department for Environment, Food and Rural Affairs
Nobel House
17 Smith Square
London
SW1P 3JR

11 May 2023

Dear Secretary of State,

We are writing on behalf of EIA, Greenpeace UK and 79 other civil society organisations. We welcome the anticipated consultation on a ban of plastic waste exports to non-OECD countries. When announced, this 2019 commitment was the most ambitious of any major exporting country in addressing the serious issues stemming from the plastic waste trade.

The reasons for such a measure are clear, the plastic waste trade causes untold environmental and human health [harm](#). The legal trade facilitates [ever-growing illicit shipments and waste trafficking](#), further aided by its opacity and the difficulty of tracking waste [outside of national jurisdictions](#). In addition, plastic waste exports since the late 1980s clearly [correlate with increased levels of virgin plastic resin production](#) – effectively acting as a linear loophole, rather than a circular system. This is all the more pertinent given the United Kingdom is one of the [largest producers of plastic waste per capita](#), one of [the largest plastic waste exporters](#) since records began, and is battling significant levels of waste crime, both [within the United Kingdom](#) and [beyond](#), as a result of continued exports.

However, since this commitment has been made, there has been an ever-mounting unparalleled body of evidence and real-world experiences that demonstrate that these very same issues are also prevalent in OECD recipient countries of UK plastic waste, examples include [Turkey](#), [Poland](#) and [the Netherlands](#). Plastic recycling in OECD-recipient countries like Turkey [threatens the human rights](#) of local communities and workers, including children, refugees, and undocumented migrants. Furthermore, even if recycled, such exports lead to [recycling capacity displacement](#) in recipient countries. Effectively curtailing a recipient country's ability to recycle domestically generated plastic waste. This has further repercussions, an example being the EU, [especially Netherlands](#), now the [largest recipient of UK plastic waste](#), increasing plastic waste exports [to non-OECD countries of late](#).

As a result, more and more non-OECD and OECD recipient countries are putting in place [strict import restrictions](#) or [bans](#) in order to protect themselves from this trade. And, crucially, exporting countries are ever more cognisant of the necessity for regulatory reciprocity. [Australia's ban](#), [the European Parliament's recent positioning](#) adopting a phased in full plastic waste export ban and the positionings of a range of different UK stakeholders reflect this. This includes [then Chief Executive of the Environment Agency Sir James Bevan](#), [the EFRA Committee](#), and [a government-commissioned independent review of Net-Zero](#) all calling for a full plastic waste export ban. Additionally, [UK recyclers](#) have for years raised the alarm that regulations, as they stand, place them at a disadvantage in addition to certain [UK businesses](#) actively seeking out UK recyclers to treat their plastic waste.

In 2019, this Government made it clear that it sought to ["continue to lead the world in tackling plastics pollution, both in the UK and internationally \[...\]"](#) and as a consequence made the commitment to ban certain UK plastic waste exports. However, as time has passed, domestic policies and this consultation's current scope have not and will not fully address the numerous issues generated by UK plastic waste exports and pollution. This is compounded by the fact that only [9%](#) of UK plastic waste exports are currently being shipped to non-OECD countries.

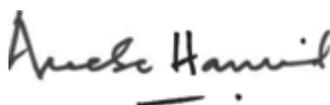
As a high-income country, the UK is best placed and responsible for the environmentally-sound recycling of its own plastic waste, with reduction of UK plastic consumption and avoidance of incineration being of primary importance in achieving this. As such, we strongly urge the government to maintain its ambition to be world-leading and, thus, include a phased-in ban of plastic waste exports to OECD countries in line with EFRA Committee recommendations within the scope of this consultation.

On behalf of all signatories, we would welcome the opportunity to discuss these matters further with you or a member of your team. We look forward to receiving your response.

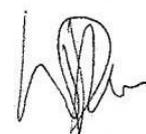
Yours sincerely,



Mary Rice
Executive Director
Environmental Investigation Agency



Areeba Hamid
Joint Executive Director
Greenpeace UK



Will McCallum
Joint Executive Director
Greenpeace UK

Mary Rice, Executive Director, Environmental Investigation Agency, United Kingdom

Areeba Hamid and Will McCallum, Joint Executive Directors, Greenpeace UK, United Kingdom

Shaun Spiers, Executive Director, Green Alliance, United Kingdom

Richard Benwell, CEO, Wildlife and Countryside Link, United Kingdom

Yasmine Ahmed, UK Director, Human Rights Watch, United Kingdom

Tom Fyans, Interim Chief Executive, Campaign to Protect Rural England, United Kingdom

Melissa Green, Chief Executive, National Federation of Women's Institutes, United Kingdom

Mike Childs, Head of Science, Policy & Research, Friends of the Earth United Kingdom/ England, Wales & Northern Ireland

Allison Ogden-Newton OBE, Chief Executive, Keep Britain Tidy, United Kingdom/ England

Owen Derbyshire, CEO, Keep Wales Tidy, United Kingdom/ Wales

Louise Reddy, Policy Officer, Surfers Against Sewage, United Kingdom

Jo Morley, Head of Campaigns, City to Sea, United Kingdom

Janet Storey, Coordinator, Plastics Rebellion, United Kingdom

Andy Atkins, CEO, A Rocha UK, United Kingdom

Kathy Wormald, Chief Executive Officer, The Froglife Trust, United Kingdom

Catherine Gunby, Executive Director, Fidra, United Kingdom

Mark Johnston, Trustee, The Scarab Trust, United Kingdom

Chris Butler-Stroud, CEO, Whale and Dolphin Conservation, United Kingdom

Nusa Urbancic, Campaigns Director, Changing Markets Foundation, United Kingdom

Kate Metcalf, Co-Director, Women's Environmental Network, United Kingdom

Jo Royle, Founder and CEO, CommonSeas, United Kingdom

Daniel Webb, Founder & Director, Everyday Plastic, United Kingdom

Thalia Bofiliou, Senior Investment Analyst, Planet Tracker, United Kingdom

Sian Sutherland, CoFounder, A Plastic Planet UK, United Kingdom

Subash Chandra Biswas, Chairperson, ASD-Bangladesh (Association for Sustainable Development in Bangladesh), Bangladesh

Kalyani Rani Biswas, Director, Women & Child Development Organization (APARAJITA), Bangladesh

Esra Tat, Executive Director, Zero Waste Europe, Belgium (European-wide network)

Gilbert Kuepouo, Executive Director, CREPD, Cameroon

Alejandra Parra Muñoz, Representante Legal, Red de Acción por los Derechos Ambientales RADA, Chile
Ana Marija Mileusnić, Campaigner, Zelena akcija / Friends of the Earth Croatia, Croatia
Anastasia Korae, President of the Board, Friends of the Earth, Cyprus
Karolína Brabcová, Toxics expert and consumer campaigns manager, Arnika, Czech Republic
Anne Aittomaki, Director, Plastic Change, Denmark
Ricardo Arnoldo Navarro Pineda, Chairperson, CESTA Friends of the Earth El Salvador, El Salvador
Muriel Papin, Déléguée Générale, No Plastic In My Sea, France
Marie Delaperrière, Coordinator, Board Member, Zero Waste Germany e.V., Zero Waste Kiel e.V., Germany
Dana Winograd, CEO, Plastic Free Seas, Hong Kong
Wing Yin Beatrice Siu, Senior Public Affairs Officer, Greeners Action, Hong Kong
Hon Keung Chu, Director of Environmental Affairs, The Green Earth, Hong Kong
Csilla Urbán, President, Humusz Szövetség, Hungary
Swathi Seshadri, Director of Programs, Centre for Financial Accountability, India
Yuyun Ismawati, Senior Advisor, Nexus3 Foundation, Indonesia
Prigi Arisandi, Founder, Ecological Observation and Wetlands Conservation, Indonesia
Ghofar Abdul, Urban Campaigner, WALHI/Friends of the Earth Indonesia, Indonesia
Titik Eka Sasanti, Programme Director, Gita Pertiwi Foundation, Indonesia
Daru Setyorini, Executive Director, Ecoton, Indonesia
Rahyang Nusantara, Co-coordinator, Alliance for Zero Waste Indonesia (AZWI), Indonesia
Jane Fischer, Coordinator, Bali Waste Platform, Indonesia
Mindy O'Brien, Chief Executive, VOICE of Irish Concern for the Environment, Ireland
Serge Doussant, CEO, Green Vientiane, Laos
Mohideen Abdul Kader, President, Consumers' Association of Penang, Malaysia
Meenakshi Raman, President, Sahabat Alam Malaysia (Friends of the Earth), Malaysia
Pushpan Murugiah, Acting Chief Executive Officer, Center to Combat Corruption and Cronyism (C4 Center), Malaysia
Lee Jing, Honorary Secretary, Environmental Protection Society Malaysia (EPSM), Malaysia
Nur Sakeenah Binti Omar, Public Engagement Campaigner, Greenpeace Malaysia, Malaysia
Pua Lay Peng, Member, Persatuan Tindakan Alam Sekitar Kuala Langat, Malaysia
Pua Lay Peng, Secretary, Kuala Langat Environmental Action association/Persatuan Tindakan Alam Sekitar Kuala Langat, Malaysia
Bishnu Bhatta, Director, Partnership for Sustainable Development Nepal, Nepal
Mahesh Nakarmi, Executive Director, Health Environment and Climate Action Foundation (HECAF360), Nepal
Liam Prince, Chairperson, Aotearoa Plastic Pollution Alliance, New Zealand
Piotr Barczak, Circular Economy Program Manager, African Circular Economy Network Foundation, pan-African
Sonia Mendoza, Chairman, Mother Earth Foundation Philippines, Philippines
Piotr Barczak, Board Member, Polish Zero Waste Association, Poland
Mihwa Kim, Chair, Korea Zero Waste Movement Network, Republic of Korea
Jaka Kranjc, Secretary General, Društvo Ekologi brez meja, Slovenia
Keith Roman, CEO, Zero Waste Association of South Africa, South Africa
Chalani Rubesinghe, Project planning and mgt. Officer, Centre for Environmental Justice, Sri Lanka
Fabienne McLellan, Managing Director, OceanCare, Switzerland
Ana Rocha, Executive Director, Nipe Fagio, Tanzania
Penchom Saetang, Director, Ecological Alert and Recovery - Thailand (EARTH), Thailand
Sascha Gabizon, Executive Director, Women Engage for a Common Future (WECF), the Netherlands
Jeroen Dagevos, Head of Programs, Plastic Soup Foundation, the Netherlands
Merijn Tinga, Chair, Plastic Free Sea Foundation, the Netherlands
Semia Gharbi, Chair, AEEFG, Tunisia
Sedat Gündoğdu, Dr./Lead researcher, Microplastic Research Group, Turkey

Betty Obbo, Project Officer, Chemicals Management & Gender desk, Bio Vision Africa, Uganda
Anastasiia Martynenko, Head, Zero Waste Society, Ukraine
Jan Dell, Independent Engineer, The Last Beach Cleanup, USA
Neil Tangri, Science and Policy Director, Global Alliance for Incinerator Alternatives ,USA
Jim Puckett, Executive Director, Basel Action Network, USA
Quach Thi Xuan, Coordinator, Vietnam Zero Waste Alliance, Vietnam