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 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,

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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
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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
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Liam Prince, Chairperson, Aotearoa Plastic Pollution Alliance, New Zealand
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Piotr Barczak, Board Member, Polish Zero Waste Association, Poland
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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
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