

Question 1 - Do you support our proposal to ban each of the single use plastic items listed above? If not, please give reasons and where possible evidence to support this view.

We of the Plas Kynaston Canal Group (PKC) and the Cefn Publicans Cartel (CPC) fully agree with the Welsh Government in the banning of the said plastic items and would recommend increasing the scope to include many other products that are having a detrimental effect on our environment and eco systems. Plastic pollution has an equally negative effect on all living organisms including humanity.

Please look at the banning or stricter control of plastic bottles as well which are a major plastic pollution source.

Question 2 - Do you agree the potential environmental and social benefits of our proposals will outweigh the potential impacts on people in Wales? Please give reasons and where possible evidence to support this view.

The potential economic impact on people in Wales of these bans is marginal, however the potential impact on the long term health of the people Wales and the integrity of our environment (which is a fundamental factor in the general health of our population) will be compromised unless control is taken of plastics.

Although not mentioned in the consultation by the Welsh Government there are 7 types of plastic.

The highest grade of plastic is in the first category and is one of the recyclable plastics, this is No 1 PET, or Polyethylene. No 2 is high density polyethylene and is often milky coloured and used in milk containers and other liquid bottles where clarity, as in water bottles is not required.

These are the high-grade plastics sought after for recycling at our recycling centres in Wales.

However even these high-grade plastics can have side effects and we quote:

If PET plastic is microwaved, or left in the sun for a long time, or re-used multiple times, the chemicals start leaching out and can be problematic. However, if used as intended, (once only) it should be a safe product.

Everyday Health 8th July 2013

The Link Between Plastics and Cancer

<https://www.everydayhealth.com/cancer/the-link-between-plastics-and-cancer.aspx>

And we quote further on this topic:

Depending on where you live and work, you're likely to be exposed to many plastic products every day. Food and beverage containers, some disposable plates, and toiletry bottles are all plastic and all are made from chemicals. Research suggests that all plastics may leach chemicals if they're scratched or heated. Research also strongly suggests that at certain exposure levels, some of the chemicals in these products, such as bisphenol A (BPA), may cause cancer in people.

Breast Cancer.org 11th September 2020

Exposure to Chemicals in Plastic

<https://www.breastcancer.org/risk/factors/plastic#:~:text=Research%20suggests%20that%20all%20plastics,may%20cause%20cancer%20in%20people>.

And if you think just making sure you don't microwave or mis-use plastic bottles is going to save you from being exposed to plastic pollution, then think again. It is now entering our food chain.

The Guardian 14th February 2017

From sea to plate: how plastic got into our fish

<https://www.theguardian.com/lifeandstyle/2017/feb/14/sea-to-plate-plastic-got-into-fish>

Question 3 - Do you agree with our assessment of the potential benefits and impacts our proposals will have on businesses, including manufacturing, in Wales? Please give reasons and where possible evidence to support this view.

From the consultation document the only product made in Wales are paper straws which are used to replace plastic straws. Therefore, on the manufacturing / production front if this is correct, should see a net gain for Wales, which we support. As for retail, catering and hospitality business ([and we are pub owners, the Holly Bush Inn Cefn Mawr](#)) there will be some small adjustment required in delivery and pricing but nothing to prevent the required changes. Please note we have been using paper straws for some time now at a marginal additional cost that has not damage our business activity.

Economics: Marine litter (plastic) causes economic losses. Among the most affected are coastal communities with negative effects showing up in increased expenditure on beach cleaning, public health and waste disposal. Loss of income from tourism downturn, marine costs associated with fouled propellers, damaged engines, litter removal and waste management in harbours. Fishing, reduced catches, fish farming disease and coastal agriculture decline. We have lots of fishing communities.

For some positive suggestions that can reduce the plastic pollution we face and have proven track records, Milk Bottles and Milk Men, why not reintroduce this species as it would help every other species on the planet. Another Circular Economy idea long since forgotten, Fish & Chips in newspaper, this is a biodegradable wrapper that has no toxic side effects that we know of and reuses, only question is, are enough papers printed these days? Unfortunately, A4 computer printer paper is not big enough although we are knee deep in that!

For real practical measures for the Circular Economy see: [The PKC Group & The Circular Economy](#)

Question 4 – Should oxo-degradable plastics be included on the list of items to be banned? Please provide evidence to support this view.

Because of the above we find these types of plastics very worrying and wonder how they have been allowed into the public domain, and we are not alone in this.

A major problem with testing oxo-degradable plastics for safety is that current standards and test methods can't realistically predict the biodegradability of plastic carrier bags within natural ecosystems as the scope of variability is so immense.

OXO-biodegradation – Wikipedia

<https://en.wikipedia.org/wiki/OXO-biodegradation#:~:text=One%20major%20problem%20with%20testing%20oxo-degradable%20plastics%20for,biodegradability%20of%20plastic%20carrier%20bags%20within%20natural%20ecosystems>.

Question 5 – Do you believe the COVID-19 pandemic has resulted in changes to the market that are currently not accounted for in our research? Please give reasons and where possible evidence to support this view.

The COVID 19 pandemic has most certainly made differences in the market as we are fully familiar with as Pub owners that have now had to close twice whilst the supermarkets and retail chains have made millions at our expense. This is not shown in the consultation response document as read here. Neither is the pattern of waste production. The consultation document states that:

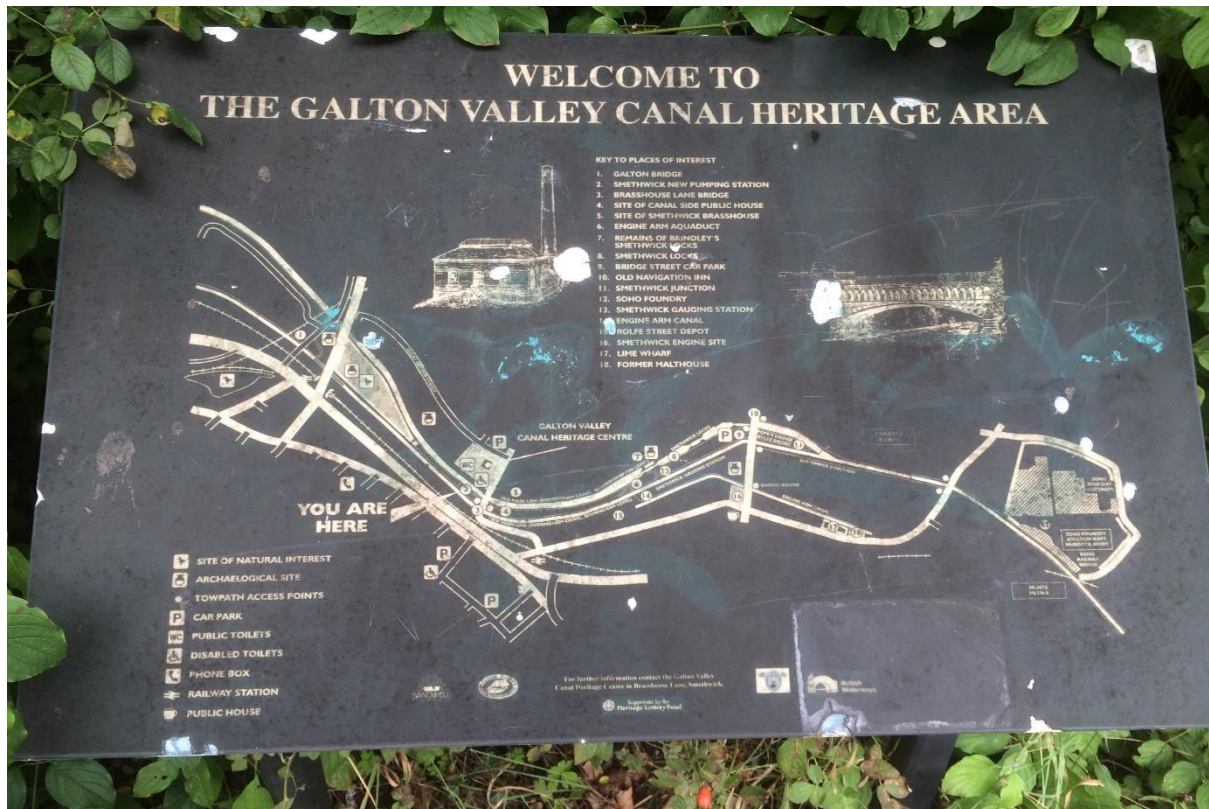
*Litter is also a key concern in our communities and one we are determined to tackle. During the recent COVID-19 lock-down, many people rediscovered and gained a greater appreciation for their local areas. **Overall, many communities benefited from reduced littering.** However, as restrictions eased, littering has become more prominent in our streets, parks and beaches.*

This is an incorrect statement for our community of the Cefn at the heart of the Pontcysyllte World Heritage Site and other areas where we have seen an increase in litter during the COVID 19 Lockdowns.



This selection of litter was collected on a 45 minute walk from our house across the Pontcysyllte Aqueduct and back at the heart of the Pontcysyllte World Heritage Site in North East Wales in early July 2020 whilst the country was still in COVID 19 Lockdown. All the items were collected as litter including the shopping bags which contain all the low-grade plastic, paper, cardboard and food waste. On show are just the selection of drinks containers picked up. Since all the pubs were still close and had been for 100 days, it is obvious where this is coming from, supermarkets and retail chains.

Unfortunately, the litter problem is not restricted to North Wales and the Pontcysyllte World Heritage Site as the following photographs taken in late August show.



Note the plastic pollution floating on the surface, there will be a lot more just below the surface than seen on the surface. This will most likely end up in our seas and food chain unless extracted.



Again, please note the amount of alcohol packaging among the plastic from supermarkets etc. We as responsible publicans care about this and wonder how the supermarkets and retail chains can retain their licence to sell alcohol. If we were responsible for this amount of litter our licences would simply be removed immediately which we would agree with. Yet the supermarkets and retail chains seem to be able to continue to cause this with impunity.

Furthermore, this is backed up by most local authorities around the UK having to deal with increased recycling rates of the waste that has made it that far and not been dumped in our communities and countryside. Please check the following links:

Wrexham Council News 22nd October 2020

DON'T RESORT TO FLY TIPPING WHEN RECYCLING CENTRES CLOSE

<https://news.wrexham.gov.uk/fly-tipping-wrexham/>

The Guardian 17th October 2020

Household recycling surge raises costs for councils in England

<https://www.theguardian.com/environment/2020/oct/17/household-recycling-surge-raises-costs-england-councils>

The Guardian 13th October 2020

UK shoppers spend £261m more on alcohol amid Covid pub curfew

<https://www.theguardian.com/business/2020/oct/13/uk-shoppers-alcohol-covid-pub-curfew-supermarkets>

BBC 11th June 2020

Zero Waste Leeds?

<https://www.youtube.com/watch?v=FHQ9O3dR6hQ>

Please note that although the Leeds story is about glass, plastic waste will also have risen on a parallel scale as will the level of all waste and litter.

So in this case we think that the Welsh Government needs to recheck this and amend accordingly and we can speak from experience as we pick the litter up around our pub, the Holly Bush Inn, Cefn Mawr, regularly as a part of our Environmental Policy.

The Guardian 14th February 2017

From sea to plate: how plastic got into our fish

<https://www.theguardian.com/lifeandstyle/2017/feb/14/sea-to-plate-plastic-got-into-fish>

Please do not let this information:

GO IN ONE WINDOW AND OUT THE OTHER:

As is the case with so many drive through fast food outlets such as McDonald's. Our local council litter pickers say these establishments are the worst as we also see in our community and countryside. I have stopped many times on the way to and from work just to pick this mess up, and I know where it is from as the brand name is on it, McDonald's.

Furthermore, on McDonald's litter, it was obvious when they reopened by the reappearance of the said waste product litter. So, from the consultation point of view, perhaps this bit was correct in the litter reduction during the lockdown, and that soon changed when McDonalds and other reopened ahead of the pubs. Furthermore, the supermarkets did not stop pumping out all their commodities in one-use plastic wrapping apart from the horrendous amount of alcohol sales, generally in cans or bottles. Personally, I have never seen so many Fosters beer cans lying around in my entire life and I am 61 years old.

Question 6: Do you agree with the exemptions we are proposing and how can we make them as clear and practicable as possible to apply?

We find the exemptions vague and ask if they are really needed. If they are and there is no sensible alternative, then fair enough, but some of the exemptions quoted seem questionable?

Question 7: Are there other exemptions we should consider in relation to all of the single use plastic items in our proposal?

Not that we are aware of and again would suggest increasing the scope of the ban.

Question 8: Do you agree the proposed timescale for the implementation of bans gives sufficient time for businesses of all types to adapt?

We agree with the set time scale but would prefer earlier implementation if possible.

Question 9: Do you agree with the proposed use of Civil Sanctions?

Yes.

Question 10 - Do you agree Local Authorities should enforce the bans?

Yes, and no real alternative but also agree with WCBC and quote:

WCBC have significant concern about the proposal for local authorities to enforce this ban. Their assumption is that there would be an expectation for trading standards, public health and licensing officers to play a role in this enforcement. Even before Covid-19, this would have been problematic for local authority officers to enforce, along with their other duties, working within ever-decreasing budgets. With the impact of the pandemic, they have seen our public protection officers stretched to their limits and beyond; therefore, would have significant concern about this additional responsibility.

WCBC would like to understand how Welsh Government expect to fund this additional work, and to understand the proposed practicalities of the role, e.g. at what point is enforcement appropriate? How would WCBC monitor and respond to cases of breach and so forth?

Question 11 – Should wet wipes be included in future proposals for further bans or are there other measures which should be introduced to address them, for example Extended Producer Responsibility? Please give reasons and where possible evidence to support this view.

Banning wet wipes is not the answer, increased taxation is. Make them expensive so the quantity is reduced, and therefore the problem will be reduced, but if necessary, they can still be bought. In our pub the girls use them against my wishes as they are cheap and easy. I recommend and use a large cloth, bucket, and bleach, a know killer of all bacteria including COVID 19 and no waste. We even reuse the bleach water as weed killer in the yard. Wet wipes are a recent problematic development along with disposable nappies and although there are uses at times, there are much more environmentally friendly alternatives. If the cheap and easy solutions are restricted through higher taxation, the government could even receive a little more revenue by helping the planet!

Question 12 – Are there any other items that should be included in any future proposals to tackle single use plastics? Please give reasons and where possible evidence to support this view.

In addition to the items mentioned in the consultation, we would like to call for a ban on all plastic non-essential promotional materials (i.e. “freebies”). These items are often given out at events, with magazines, in shops etc. and are often targeted at children. They have no functional use, are often poor in quality and quickly discarded. They often unrecyclable. We believe that these items add unnecessary plastics to our waste, and promote a message which is at odds with the environmental responsibility we are otherwise teaching our younger generations. We would also like to see a ban on plastic confetti (used at weddings, celebrations and in greeting cards).

Plastic types, only the higher grades of plastic are recyclable and if all plastics were of this grade then the recycling would be more efficient and cost effective.

At present only about 10% of plastic is recycled at best and even though you may have a grade 1 plastic bottle the label on it and cap is something else which complicates matters and prevents recycling in many cases.

Furthermore the constant recycling of material has to stop as this is a significant cause of pollution itself through the huge energy requirements and further waste product, such as all the CO2 from producing the energy to recycle the packaging material, coupled with all the transport costs etc.

CIGARETTE STUBS

Another major plastic pollution source not mentioned in the WG Consultation document that is having significant impact our marine environment are cigarette stubs. The filters are made of fibrous plastic that is very easily broken down into micro fibres, and even before this happens are relatively small pieces of plastic waste.

In recent years the problem with this plastic waste has grown immensely since the ban of smoking in pubs. It is reported by the [MCS, Marine Conservation Society](#) that cigarette stubs found on our beaches rose by over 100% following the ban on smoking in pubs.

The simple explanation of this is that since people are now smoking outside, more cigarette stubs are ending up on the floor, and not in ash trays. The cigarette stubs are easily washed by rain into storm drains, and from there into our local water courses, and thence onwards to the sea. Storm drains are not filtered and do not go through treatment plants. Hence this explains why there was such a dramatic increase in cigarette stub pollution following the ban.

Circular Online 15th May 2013

100 Percent Rise In Cigarette-Stub Litter On Britain’s Beaches

<https://www.circularonline.co.uk/news/100-percent-rise-in-cigarette-stub-litter-on-britains-beaches/>

National Geographic 9th August 2019

Cigarette butts are toxic plastic pollution. Should they be banned?

<https://www.nationalgeographic.com/environment/2019/08/cigarettes-story-of-plastic/>

At the Holly Bush Inn, Cefn Mawr we actively try to stop this form of pollution paying particular care to pick all cigarette butts during our litter picks. This prevents them being washed into the drains. Furthermore, we provide PUBLIC ASH TRAYS at all the external doors of our pub, so that should some one wish to dispose of the cigarette stub, they can without dropping it on the street. This also helps to save us picking them up to save our environment.



We are also having concerns about Vaughn Getting's proposals to the Senedd for banning smoking at outdoor areas of pubs, café's and restaurants.

This will be counter productive and will not benefit the environment. If people are forced to smoke in "other areas (?)" as proposed by VG, this will only further ensure the current problems with cigarette stub pollution get worse and not better.

A far better solution would be to ban smoking in public areas, unless in a dedicated smoking area, such as at the pubs, cafes and restaurants where ash trays are provided. The cigarette stubs pollution could then be reduced and controlled unlike the reality of what is being proposed.

Furthermore, we question the fairness of VG's proposal as publicans. Banning smoking at our pub will no doubt reduce our customer base once again, as it did when smoking was banned in pubs. Therefore, we as publicans will loose further takings because of the use of a product we do not sell.

Whilst we note there is no mention of banning smoking in supermarket and retail chain car parks etc whom are the main retailers of this product, tobacco. Therefore, the supermarkets and retail chains will continue to make millions from sales whilst we are penalised for what?

Therefore, Vaughn Getting's proposal is not fair or constructive towards the health of the planet and the nation of Wales. Please remember that cigarette butts are a number 1 polluter.

Wales on Line 14th July 2020

Wales moves to ban smoking outside pubs, cafes and restaurants

<https://www.walesonline.co.uk/news/health/wales-moves-ban-smoking-outside-18595823>

A small note in the current pandemic, we collect the cigarette stubs around our pub and dispose of them responsibly through the Shrewsbury ERF via Veolia. This minimises Coronavirus Cross Infection Risk Factor in our community, as there can be not better waste product for carrying the virus than cigarette stubs.

The Courier 5th June 2020

Fears cigarette butts could be contributing to Covid-19 spread at Fife healthcare sites

<https://www.thecourier.co.uk/fp/news/local/fife/1351892/fears-cigarette-butts-could-be-contributing-to-covid-19-spread-at-fife-healthcare-sites/>

SUSTAINABILITY

The word and term of Sustainability has become something of a fashion word used by many trying to promote some aspect as a sales pitch irrespective of whether the subject is sustainable or not. The true definition of this word is that it means something we can do repeatedly without destroying our environment and in the case of the Welsh Governments FGA 2015, without causing unnecessary hardship to our future generations.

The plastics industry in its present form worldwide is NOT a sustainable practice.

It is a major user of oil which all plastics are made from, and oil is a very finite resource with world reserves being rapidly depleted. Once mineral oil has run out, we will be back to the beginning of the Industrial Revolution where oil was at a premium price and largely extracted from slaughtered whales. Unfortunately in our case today, there have never been enough whales in the oceans at any one time to support our present demands for oil, and given the fact that we are causing such wide spread pollution of the marine environment with plastic and oil production, marine life is being reduced. This will not have a good ending unless changes are made.



Take for instance the above photograph for proof of an unsustainable practice. The water bottles lying on the seabed are made from a mineral (oil) extracted from extremely limited rock formations many thousands of feet below the earth's crust and ocean floors. This limited mineral is then used for many purposes including the production of plastic water bottles. These plastic water bottles are then used once and dumped in many cases leading to the above mess and pollution of our sea and ocean floors.

Therefore, we are taking what is a limited resource and using it to contain what is in relative terms of quantity, a limitless resource. The plain truth is, there is just not enough oil available to bottle all the world's water, and in trying to do so, we are rapidly destroying our environment.

The UK, mermaid tears (bits of plastic) are the second common plastic litter found on beaches according to the Marine Conservation Society's 2007 data and a Surfers Against Sewage report.

Coastal Care & Plastic Pollution 2009 & 2020

The World Population is living, working, vacationing and increasingly conglomerating along the coasts, and standing on the front row of the greatest, most unprecedented, plastic waste tide ever faced. According to the National Oceanographic and Atmospheric Administration, plastic debris kills an estimated 100,000 marine mammals annually, as well as millions of birds and fishes.

<https://coastalcare.org/2009/11/plastic-pollution/>

In summary:

The throwaway society needs to stop, and we need to move onto a Circular Economy. Therefore, we support the Welsh Government with the Circular Economy and the FGA 2015 to give our Children and Grand Children a better chance.

On behalf of the PKC Group, the CPC and the people of the Cefn.

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