

From: [REDACTED] <[REDACTED]@coastwatch.org>
Sent: Friday 25 November 2022 19:33
To: SingleUse
Cc: [REDACTED]
Subject: Coastwatch submission on single use cup consultation
Attachments: Coastwatch response to Single Use Disposable Cup public consultation Nov 22.docx

Dear team working on the single use cup levy.

Please find our submission enclosed. WE had hoped to also attach the latest Coastwatch survey data but are still working on it for launch on Dec 5th

Apologies. For getting it in last minute
Very best

[REDACTED]

[REDACTED]

Coastwatch Coordinator

Irish Government Disposable Cup Levy Consultation



Coastwatch submission prepared by [REDACTED] and [REDACTED] drawing on the data and agreed positions of Coastwatch coordinators and surveyors from across the island of Ireland.

Coastwatch welcomes the proposed coffee cup levy for all hot drinks as a clear, well designed piece of legislation to stem the tide of single use containers of this kind. It is for all hot drinks sold in cafes, petrol stations, shops, caravans and at festivals.

The studies to underpin the law are well designed and informative. We hope that Ireland will once more lead in this field as it did not plastic bag tax and that other countries will follow fast to bring wider benefits.

We do have some concerns though which might still be addressed.

- 1. Lids** - In our Coastwatch data we see a lot of lids washed up as marine litter. More than cups with more adverse comments.
We urge you to add a lid levy for 2 reasons:
 - people may decide they do not need a lid if they are jus standing with their cup so reducing the single use plastic.
 - The total levy of cup and lid would probably irritate more consumers and support a faster switch.
- 2. Single use plastic containers for cold drinks** should also be added.
Reasons:
Milk shakes and similar iced drinks are usually sold in plastic container with a plastic bulb lid with a straw. That is 3 disposal items to drop or put into litter bins mixed with other waste. In summer they are a finger print marine litter around sales points.

We have noticed a dramatic shift to single use plastic cups from glass since COVID. This reduces staff costs unless of course there is a levy.
- 3. Size of levy**
The 20c levy may not be high enough to persuade enough consumers to switch to reusable cups. Smaller operators may have cup stocks to run down and feel hard done by if they are left with these stocks. So we would propose that as the levy comes in, you announce that it will be reviewed after 1 year and is likely to increase. This would give the necessary run in time to adjust businesses and canteens to switch to lovely pottery or china and multi-use cups with a significant deposit (like the TCD 1 euro deposit) This would also help our tourist industry and support the cafes which bring more character.
should help conversion to keep cups and also support our craft industry pottery mugs etc.
- 4. Applying the levy whole sale.** To catch all single use drinks containers, rather than just those which the consumer pays for is a concern. We agree with the VOICE submission brought to our attention when discussing this. VOICE propose that the

levy is applied at the whole sale stage. This means that the cost is past down to the consumer where the consumer pays for the drink and is shouldered by the host where the company or event organiser decides to give the drink for free.

5. **Other SUP items** to tax outside the drinks container field. There are a number of other items which we come across as significant or high risk SUP litter in our annual Coastwatch survey. That includes helium balloons (bot plastic and rubber).

Please see our Marine Litter Recommendations booklet published in 2019 on line. In early 2023 we plan to have a marine litter workshop which will include a review and update of these. Proposals for this review are coming in now and include:

Single use cable ties. They have become a noticeable marine litter item around aquaculture sites where hundreds might be used in a day and discarded or lost onto the shore. They are also used to put up posters at election times and become road litter.

Single use plastic packing straps: These usually white polypropylene straps are mentioned far more as problem litter in our survey in the last 3 years. Sometimes you find a whole roll presumably washed overboard, but most arrives swept up in short white cut lengths or loops which make them much more dangerous for wildlife and boat propellers. It was suggested to us that these are used on factory fishing vessels for tying boxes of fish which is then frozen and sold to pot fishermen with bait. We have seen it on bait boxes brought on board by pot fishermen. To achieve the desirable outcome of either reusable box with closure a high levy would be used. Another option is a deposit on return as the fisherman pays for the individual bait boxes with known packing straps, returning them and getting the deposit back would encourage the clean plastic to be recycled.

Our autumn 2022 Coastwatch survey results will be launched on Dec 5th in TCD.

Our Coastwatch autumn survey form specifically asks for polystyrene coffee cups as we were following the effect of the SUP Directive ban on these. We did not get a single comment about finding intact polystyrene cups but did get several on pieces of these.

Further remarks focussed on the non-polystyrene scourge of single use cups in general. From asking a few Coastwatch core team members for their observations, the polystyrene cup has almost disappeared as marine litter item over the last 3 years. We will propose that next year we change this question to single use cups.

http://coastwatch.org/europe/wp-content/uploads/2020/09/Coastwatch-Marine-Litter-Autumn-2019-Survey-Results_draft_v4.pdf

<http://coastwatch.org/europe/wp-content/uploads/2020/09/Marine-Litter-Recommendations-Draft-05.06.2019.pdf>

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