



Committee Stage briefing on the Environment Bill's provisions relating to plastic and electronic waste

October 2020

agenda for manufacturing to lead the way, and to inform and include citizens in making better choices.

The Royal Society of Chemistry has done extensive work with our scientific community both plastic and electronic waste in the UK. While the Environment Bill contains a number of provisions to reduce the environmental harms of such waste, there is more that can be done that reflects the evidence and acts as a useful stepping stone as we move towards a circular economy.

The Environment Bill should:

1. Encourage the use of Life Cycle Analysis (LCA) of products
2. Encourage eco-design and allow authorities to set minimum standards for eco-design
3. Mandate tracking of e-waste and the Critical Raw Materials (CRMs) contained within, and include this information in the National Materials Datahub
4. Better labelling of products so CRM-containing electricals are not lost to landfill
5. The waste hierarchy should be included in implementation plans

1. Encourage the use of L

- x Will the right to repair extend across all products?
- x Will authorities be encouraged to set minimum standards for eco-design, how will these be enforced? Will minimum eco-design standards extend across a range of materials and products?
- x How will the government ensure effective data wiping is built into electronic devices?

One of the main concerns preventing consumers from recycling their used electronics is data security, and at present, it's not clear that resetting devices to factory settings is enough to ensure the data is safely wiped. There should be regulations around data wiping to ensure safe reuse and reselling of electronics.

3. Mandate tracking of e-waste and the CRMs contained within, and include this information in the National Materials Datahub

Critical Raw Materials (CRMs) are those which have constraints on supply, but are essential for various systems.

4. Better labelling of products so CRM-containing electricals are not lost to landfill

Without accurate labelling, the content of a product is not known, which poses challenges for the consumer, supply chain, and eventually the waste management worker. For example, it can be difficult for consumers to know what devices contain which CRMs and in what quantities, so they are unable to make informed choices about sustainable purchases. Many consumers do not even know their devices contain critical elements.² Furthermore, waste management workers must be able to know the CRM content of a product in order to facilitate effective recycling. Moving forward it would be useful for a manufacturer to highlight via labelling the most efficient way of recycling various components, for instance.

Clarification: Schedule 7, page 167, lines 8-10

- x This section of the Bill allows for regulations that would require labelling/marketing of products to evidence their compliance with resource efficiency. A labelling scheme should be globally harmonised, and be suitable for consumers, with separate clear labelling for waste management workers. How will this be ensured and implemented?

5. The waste hierarchy should be included in implementation plans

The waste hierarchy ranks product use and waste management options according to what is best for the environment.³ It has been simplified for public awareness as 'Reduce, Reuse, Recycle'. Top priority is preventing waste in the first place ('Reduce'), an example of this might be the attempt to limit single use plastics. Also crucial is 'Reuse', or ensuring that products are durable, and can be repaired and resold, allowing for several lifetimes prior to needing to be recycled. Keeping products in use for as long as possible is crucial for reducing their environmental impacts. The waste hierarchy should therefore be an important part of any waste management scheme.

Clarification: Schedule 4, page 151, lines 18-20

- x Will regulations, made to ensure consideration of the waste hierarchy, be applied across all materials including plastics and electronic waste?
- x How will the waste hierarchy be applied to prioritise reduction and reuse (over recycling)?