



Submitted by email to: Plastics.consultation@defra.gov.uk

**Response to Call for evidence on commonly littered and problematic plastic items
(February 2022)**

1. The Campaign for National Parks is the independent national voice for the 13 National Parks in England and Wales. Our mission is to inspire everyone to enjoy and look after National Parks – the nation’s green treasures. We have been campaigning for over 80 years to ensure that our National Parks are beautiful, inspirational places that are relevant, valued and protected for all.
2. Campaign for National Parks brings together a wide variety of people and organisations to address issues affecting National Parks and take action to keep these beautiful places safe. We draw on a large pool of experts among our members, many of whom are actively involved in designated landscapes and their communities, across England and Wales and further afield. We also work closely with the individual National Park Societies (NPSs).
3. We welcome the opportunity to respond to this call for evidence. Our submission focuses specifically on the issue of plastic tree guards which is a particular concern in National Parks. Friends of the Dales, with support from Friends of the South Downs, have initiated a campaign to reduce single-use plastic tree guards in National Park, and this now has the support of the majority of NPSs. Details of the campaign statement and supporting organisations are included at the end of this submission and below we have provided some further information in response to selected questions in the call for evidence.

Q24: Please state any further single-use plastic items that you think should be considered for targeted future policy actions, and your reasons for this.

4. The [England Trees Action Plan](#) has set ambitious targets for woodland creation rates in order to deliver England’s contribution to meeting the UK’s overall target of planting 30,000 hectares per year by the end of this Parliament, in order to help meet commitments on both climate change and biodiversity. While we broadly welcome this ambitious government initiative, we are very concerned that this high level of tree planting will result in high levels of single-use plastics unless measures are introduced to require alternatives to plastic for tree guards. Most planted saplings require some form of protection from rodents and deer in order to survive until they are well-established, and most tree guards are currently made of single-use plastic. Unfortunately, our National Parks are already littered with degrading plastic tree guards which have been forgotten or ignored by those responsible for planting the trees who rarely recover the plastic tree guards for recycling. We want to see a complete end to the use of single-use plastics in the supply of tree guards (much of which will inevitably become highly polluting micro-plastics) as well as the introduction of more effective controls and auditing in order to require a greater focus on recovering old tree guards and preventing further pollution.

Q25: Regarding any additional items that you have provided, are you aware of any environmentally friendly alternatives that could be used instead?

5. There are a number of potential alternatives currently under trial, the most promising of which is manufactured by Nexgen (www.nexgen-ts.com) using wool and bio-based chemistry. Other suppliers of biodegradable tree guards include:
- Agrovista Amenity - www.agrovista.co.uk
 - Sirane Group - www.sirane.com
 - Biocycle Innovations Ltd – www.biocycle.co.uk
 - Biome (their "vigils bio" is now sold by Suregreen) – www.sure-green.com
 - Green Tech – www.green-tech.co.uk
 - Cheviot trees – www.cheviot-trees.co.uk/
6. It is also worth noting that there is widespread discussion that tree guards can be dispensed with altogether in certain environments. The Woodland Trust is undertaking further research into alternatives to plastic tree guards, details of which are available here: <https://www.woodlandtrust.org.uk/about-us/what-we-do/research-and-evidence/plastic-tree-guards/>

Plastic Tree guards – A campaign statement

Society and government are increasingly calling for a reduction in plastics in the environment. Due to the Climate Crisis and declarations of a climate emergency, they are also calling for an acceleration of tree planting in order to sequester carbon and off-set carbon emissions. However, we believe that an increase in tree planting should not equal an increase of plastic in the environment.

We believe that the current practice of using plastic tree guards in woodland creation is unsustainable. Plastic tree guards are a product of the fossil fuel industry, thereby a contributor to global heating. We support the collection and recycling of redundant tree guards. However the size of that task only serves to underline that we should not add to this waste. There must be more accountability for the removal of plastic tree guards once they have served their purpose.

Alternative (compostable) guards and methods of woodland creation are increasingly being used; they replace the polypropylene tubes that have a life span of centuries either in dumps, other plastic products or as micro plastics in the ocean and soil.

Major tree planting organisations such as the Woodland Trust have decided to cease using single use plastic when planting by the end of 2021. We support this sea change in our relationship to single use plastics, woodland creation and the natural world. We support the campaign to reduce single use plastic in our national parks and the landscape.

Friends of the Dales / Friends of the South Downs/ Cymdeithas Eryri Snowdonia Society/ North York Moors Association/ Exmoor Society/ Brecon Beacons Park Society/ Friends of the Pembrokeshire Coast National Park/ Friends of the New Forest/ The Broads Society/ Friends of the Peak District/ Dartmoor Preservation Association/Campaign for National Parks

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