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28 January 2024

Mr. Tokunbo Wahab
The Honorable Commissioner
Ministry of Environment and Water Resources
Block 16, The Secretariat Annex,
Alausa, Lagos.

Dear Sir,

OPEN LETTER – BAN ON STYROFOAM AND SINGLE-USE PLASTICS

I write in reference to your recently announced ban on Styrofoam and other single-use plastics.

We applaud the resolve of LASG to deal with this long-standing problem. Most would agree that the elimination or reduction of these materials is ultimately in the interest of the State, and the local and global environment. We however would like to communicate the following observations:

1. On styrofoam, it is commendable that the State has conceded to give some very limited time to the small and vulnerable individuals and small businesses especially in the food service value chain who may use these products in their business to enable them work through their stock on hand. This approach is fine for the Styrofoam element of the ban which should be implemented quickly.

2. With respect to "other single-use plastics", there are a number of concerns.

I. First, it is not clear what the ban encompasses, as even globally, the definition of single use plastics is subject to local interpretation. Before instituting a ban, LASG must itself have and must provide clarity and locally relevant guidance on what is covered to enable compliance and to avoid exploitation of citizens by enforcement agencies. For example, how does this affect water satchets ("pure water"), PET bottles and other material which are in wide, daily and ubiquitous use.

II. Practical and realistic plans have to be developed for a phased transition to the desired state that prioritizes dealing first with the least useful and most harmful of these substances, bearing in mind the local realities. In the absence of potable water in many parts of the State, for example, satchet water is filling a critical gap for drinking water for possibly millions of citizens at a cost they can cope with. If not carefully dealt with, poor implementation could itself become a public health risk and hazard.

3. While the styrofoam ban can proceed as currently envisaged, we believe the wider ban on single-use plastics needs an implementation approach and timing that allows for further clarification, consideration, consultation, planning and awareness building if it is to be successful in implementation and not predatory in its effect on the most vulnerable.

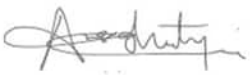
4. Of equal or possibly more importance as instituting and enforcing bans are:

I. Public enlightenment programs aimed at behavior change in waste disposal practices

II. Effective Recycling strategies

5. Going forward, the extent to which design choices in constructing drains and channels can mitigate waste-clogging issues should also be considered.

Yours faithfully,



Funso Doherty