

Defra,
Single Use Carrier Bags
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Dear Sir/Madam

Ref: Consultation on the proposal to extend the single-use carrier bag charge to all retailers and to increase the minimum charge to 10p

NLWA is pleased to have the opportunity to respond to the government's consultation on the proposal to extend the single-use carrier bag charge to all retailers and to increase the minimum charge to 10p.

NLWA is the joint waste disposal authority for north London established by the Waste Regulation and Disposal (Authorities) Order 1985. As a joint waste disposal authority NLWA is responsible for the disposal of waste collected from households and local businesses by seven north London boroughs – Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest, the 'constituent boroughs'. NLWA manages the residual waste from all seven boroughs, recyclable and compostable waste from six boroughs and all the north London reuse and recycling centres except in one borough. NLWA also delivers extensive behaviour-change campaigns in the fields of waste prevention and recycling.

Whilst we have reviewed all the consultation questions, we have confined our comments to the elements of the consultation that are relevant to a waste disposal authority in the capital. We also responded last year to the HMT call for evidence on plastic waste and to Defra's consultation on proposals to ban the distribution and/or sale of plastic straws, plastic-stemmed cotton buds and plastic drink stirrers in England.

NLWA Comments

We have experience of delivering a number of waste prevention initiatives aimed at reducing single use plastic waste including:

- Running information stalls to encourage north London residents to avoid single use plastic carrier bags when shopping in small retailers (who can still provide single use plastic carrier bags without a 5p charge attached).
- Working with small retailers to encourage them to give out reusable shopping bags rather than single use plastic ones.

Our response draws upon this experience where relevant.

Questions

Q1. *What is your name?* Cllr Clyde Loakes

Q2. *What is your email address?* Please email Barbara.herridge@nlwa.gov.uk

Q3. *What is the name of your organisation?* North London Waste Authority

Q4. *It would be helpful in our analysis if you could indicate which of the sectors you most align yourself/your organisation for the purpose of this consultation:*

a) Public body

Q5. *The government proposes to extend the Single Use Carrier Bag charge to all retailers in England. Do you agree with this proposal?*

a) Yes

Please give reasons for your answer. Where available, please provide supporting evidence.

We agree with this proposal because:

1. The environmental impact of a single-use plastic carrier bag is not determined by its source – so there should be no distinction between the tax on a single use plastic carrier bag bought from one retailer compared to another.
2. Adding a charge to all single use carrier bags (SUCBs) sends a much clearer message to consumers that these bags have a negative environmental impact and that we would preferably see them not used.
3. We believe that extension of the tax to bags sold by small retailers will be effective in reducing single use plastic usage. If we don't take some action consumption of SUCBs will remain at current levels of around 4.6 billion plastic bags per year. As noted in the impact assessment - extending the 5p SUCB charge to SMEs is estimated to result in an 80% decrease in SUCBs from 3.6 billion in 2018 to 734 million SUCBs by the third year of the change (2021). Our own research supports the national statistics which show shoppers' use of single-use plastic carrier bags will decline if a charge is introduced for single use products, whilst reusable alternatives are exempt.

Give the Bags a Break

The aim of the NLWA 2017-18 reusable bag project was to reduce the use of single use plastic bags in north London. The project took inspiration from a Street campaign for reusable bags¹ that had been undertaken in Brussels.

¹ For information on the project in Brussels see the two short films that were produced as result:

In Dutch: <https://vimeo.com/204008237>

In French: <https://vimeo.com/204008322>

Through the Give the Bags a Break project, officers worked with small retailers and their customers to encourage reduction of single use plastic bags. Seven large events took place in north London throughout February 2018. Prior to the events, officers held discussions with the retailers as to how the message could be best communicated to their customers and offered promotional posters for their shop.

During the events, officers offered passers-by free reusable bags and encouraged them to complete a survey about their bag habits. Those that completed the survey were entered into a prize draw to win Sea Life London Aquarium tickets.

Seven events were delivered, directly engaging with 736 residents; 1,100 bags (an average of 157 per event) were handed out and 64 residents entered into a prize draw.

Results from the survey indicate that **99%** (132 respondents) said they already use reusable bags, while only **1%** (2 respondents) said they did not use reusable bags. Out of the participants who used reusable bags:

50% (65 respondents) said they always use their reusable bags, whilst a further **6%** (8 respondents) said they used them every time they shop, **21%** (27 respondents) stated they almost always use reusable bags.

From the questionnaire results residents' motivations for using reusable bags show that:

81% (107 respondents) choose reusable bags because of the impact on the environment,

40% (53 respondents) stated money savings as the reason and

19% (25 respondents) because of convenience.

It is interesting however, that although nearly everyone we spoke to said that they already use reusable bags, only half are using them all of the time. The motivations are there to use reusables, but for half of those spoken to, the motivations are insufficient or other factors are more overwhelming; so that they don't choose the reusable alternative every time.

Q6. Do you agree with the assumptions and the assessment of costs and benefits in the impact assessment on extending the charge to all retailers?

a) Yes

Please give reasons for your answer. Where available, please provide supporting evidence

We agree with the assumptions and the assessment of costs and benefits in the impact assessment on extending the charge to all retailers on the basis that we have seen nothing which counteracts this view.

Q7. Do you support the proposal to increase the minimum charge from 5p to 10p?

a) Yes

Please give reasons for your answer. Where available, please provide supporting evidence

We support the proposal to increase the minimum charge from 5p to 10p because the impact modelling suggests that this will result in a 90% drop in the use of SUCS at supermarkets, 80% at high street retailers in Year 1 but 90% reduction for smaller retailers only by Year 3. This assumption draws on the evidence from England and other countries. Wales, Northern Ireland, Scotland and England all set the charge at 5p, and all saw average reductions in bag usage of around 81%. In the Republic of Ireland the charge was deliberately set six times higher than the average level that consumers reported that they would be willing to pay for a bag to influence consumer behaviour, this led to a 90% reduction in bag use.

Q8. Do you agree with the government's assessment of the impact on the consumption of single use carrier bags as a consequence of increasing the charge from 5p to 10p?

a) Yes – although we have no additional evidence to provide.

Q9. Do you agree with the government's assessment of the impact on consumption of bags for life as a consequence of increasing the charge from 5p to 10p?

a) Yes

Please give reasons for your answer. Where available, please provide supporting evidence.

The evidence from other countries including the Republic of Ireland which is outlined in the impact assessment accompanying the consultation provides a compelling case for the assessment of the likely impact of increasing the charge from

Q10. Would you support a requirement for producers of plastic packaging to separately report the number of single use carrier bags they place on the UK market as part of their obligation under the Producer Responsibility Obligations (Packaging Waste) Regulations 2007 (see para 36)?

a) Yes

Please give reasons for your answer. Where available, please provide supporting evidence.

As detailed in paragraph 36 of the consultation document in the absence of data reporting obligations placed on small businesses it is important to ensure the impact of the changes is fully assessed. We consider that a good way of ensuring that the data is as comprehensive as possible is to ask producers of plastic packaging to separately report the number of single use carrier bags they place on the market in England, Scotland and Wales as part of their reporting obligations under the Producer Responsibility Obligations (Packaging Waste) Regulations 2007 (as amended).

Q11. Do you support the proposal to remove the existing exemption for carrier bags supplied at security restricted areas at airports (apart for the supply of duty-free alcohol and tobacco sales in sealed bags)?

a) Yes

Please give reasons for your answer. Where available, please provide supporting evidence.

The environmental impact of a single-use plastic carrier bag is not determined by its source – so there should be no distinction between the tax on a single use plastic carrier bag bought from a high street retailer or a retailer in the security restricted area of an airport.

Adding a charge to all single use carrier bags (SUCBs) sends a much clearer message to consumers that these bags have a negative environmental impact and that we would preferably see them not used.

Q12. Do you support the proposed date of January 2020 by which changes will enter force?

a) Yes

Please give reasons for your answer. Where available, please provide supporting evidence.

A first January date for the changes coming into force would be preferable so that it ties in with producer responsibility obligations reporting timetables. Giving retailers one year to prepare for the changes is also helpful. However, in order to prepare small retailers in particular, for the changes the government should consider an extensive communication campaign to ensure that retailers are ready for the change. As noted in the impact assessment based on the experience in Wales, approximately 50% of complaints were about non-compliance by SMEs. It would be good to ensure as low a level of complaints as possible following introduction of the changes in order to give credibility to the scheme.

Q13. Please provide any evidence or information that moving to a mandatory approach would encourage small retailers to act more uniformly, indicating the level of enforcement that might be needed?

We have no additional evidence to provide.

Q14. Please provide any evidence that demonstrates large retailers' levels of compliance with the existing obligation to charge a minimum of 5p for single use carrier bags?

We have no additional evidence to provide.

Q15. Is there anything else you would like to tell us relating to the proposals set out in the consultation? In particular, is there any additional evidence that we should consider.

It is unclear from the consultation whether the requirements to charge 10p for SUCS will apply to market stalls. It is assumed that they will, but it would be helpful to clarify this so that market traders are aware of their obligations from the outset. For the scheme to be most effective it is essential that all retailers comply with their obligations in order to ensure that there are no distortions in the market which could affect consumer behaviour.

Ensuring that the legislation is properly implemented for retailers' online sales and home delivery services will also be important to make the scheme most effective.

Any products included within the scope of the charge or tax should have a genuine, and similarly easily available, less environmentally damaging alternative for consumers to buy. In the case of SUCS, there was and continues to be a wide range of more durable reusable bags available. It is also still an option for the consumer to choose the single use alternative and pay the tax. We therefore support the implementation of these proposals.

Conclusion

In conclusion, NLWA is supportive of government intervention to reduce the amount of single-use plastic waste which is currently thrown away and welcomes the opportunity to input to the debate on extending the charge for SUCS. We would also welcome the opportunity to input further into this useful and interesting debate and given the extent of our waste prevention activity would be most willing to consider whether we could trial any interventions locally prior to wider rollout.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Clyde Loakes', written in a cursive style.

Cllr Clyde Loakes
Chair, North London Waste Authority