

Sustainability Committee

SC(3)-11-08 (p1): 22 May 2008

This paper outlines the British Retail Consortium's response to the petition seeking to ban plastic bags in Wales which is currently being considered by the Sustainability Committee.

Summary

The BRC wishes to work with the Welsh Assembly to reduce the number and environmental impact of single-use carrier bags through voluntary measures, education and incentivisation. The BRC believes a voluntary approach and public engagement will have the greatest impact on changing consumer attitudes and behaviour in the long term.

The BRC is also extremely concerned about the unforeseen consequences which may result from a ban, possibly resulting in a far worse environmental outcome. We believe that it is imperative that decisions are based on sound science and an approach which holistically examines plastic bags and their alternatives very carefully.

The BRC strongly believes that the Welsh Assembly should allow the voluntary agreement between WRAP and retailers to run its course and formulate its next steps based on these outcomes.

Introduction

The British Retail Consortium (BRC) is the lead trade association for the UK retail sector and the authoritative voice of the industry to policy makers and the media, locally and nationally. We represent the whole range of retailers, from large multiples and department stores through to independents, selling a wide selection of food and non-food products.

The BRC fully supports the need to reduce the environmental impact of single-use carrier bags. Retailers have already shown their commitment to tackling this issue through voluntary measures, such as promoting re-usable 'bags for life' and entering a voluntary agreement with the Waste and Resources Action Programme (WRAP).

The BRC does not support the petition to ban plastic bags in Wales. We believe voluntary action by retailers is the most appropriate course of action, supported by Government education programmes. Together we need to engage customers in addressing the behaviours which lead to habitual use of single-use carriers.

Exploring the issue

The banning of plastic bags as proposed by the petitioner is a complex issue. The BRC believes that the key outcome in this discussion should be to deliver the best net result for environmental sustainability.

The environmental feedback effect of banning plastic bags needs to be assessed:

- Are the alternative to plastic carrier bags more environmentally sustainable?
- What are the other uses (re-uses) for plastic bags?
- Which type of plastic is to be caught by the petition - does this include reusable bags for life and compostable packaging, etc?
- What are the impacts on different types of retailers and are these proportionate to any environmental gains?

The Scottish Government study "Proposed Plastic Bag Levy - Extended Impact Assessment" provides some useful analysis in this area.

The paper bag

Unless the underlying customer behaviour is addressed, a ban on plastic bags will simply result in their replacement by paper carriers. It is widely accepted that paper bags have a significantly higher environmental impact than plastic bags. Paper bag production utilises a higher consumption of water, natural resources, and energy. This results in higher emissions of greenhouse gases and eutrophication of water bodies (rivers, lakes, etc) relative to plastic bags' "(Proposed Plastic Bag Levy - Extended Impact Assessment Summary Report, Scottish Executive, July 2005)." This will completely negate any environmental benefit of a plastic bags ban or levy.

Furthermore, paper bags are 4-5 times more voluminous than plastic, resulting in an equivalent increase in the number of deliveries to store and associated higher environmental impacts - increased road miles, congestion and vehicle emissions and overall environmental footprint. Paper bags are also 4-5 times more expensive than plastic, leading to a significant cost increase borne primarily by High Street stores and consumers.

Waste Impact

Plastic carrier bags account for 0.064% of litter pollution "(Reference to ENCAMS survey in Scottish Executive Proposed Plastic Bag Levy - Extended Impact Assessment Report, July 2005)." Whilst experience in other countries shows that introducing a ban or levy will reduce the number of plastic bags in circulation, it does not make a significant difference to the amount of street related litter.

A study by the Scottish Executive in 2005 found that a levy on plastic and paper carrier bags would lead to a mere 0.26% decrease in household waste but would result in significant burdens for small and non-food retailers.

Plastic carrier bags ending up in landfill take up an insignificant amount of space - around 0.3 per cent. The materials that take up most space in our landfills are paper and wood-based products, organic waste and construction debris. These are the materials most likely to contribute to greenhouse emissions and groundwater pollution.

Across Europe, it is estimated that 30 million tonnes of oil each year is saved by burning waste plastic in clean energy-from-waste plants. One incinerated carrier bag will keep a 60 watt light bulb burning for an hour. It is, therefore, the disposal of plastic bags, not their existence, which should be addressed.

Defra research has found that 80 per cent of people re-use single trip plastic carrier bags in the home. The 'feedback effect' including the resources and energy of replacing uses of these bags needs to be carefully considered.

Independent and town centre retailers

Maintaining a variety of retailers, and vibrant town centres is important to local residents and local sustainability. Retailers relying on impulse purchases will be placed at a disadvantage by a ban, since shoppers are less likely to 'bag-up' before they shop. A ban on plastic bags will also be particularly problematic for non-food retailers such as those retailing clothing and toys.

In the current economic climate, both retailers and consumers are particularly sensitive to increases in direct and associated costs. This includes the financial effects, the reduction of footfall - which particularly impacts small to medium sized business and a potential in impulse buying - again impacting primarily small to medium sized businesses.

Changing behaviours but not values

Punitive measures may change behaviour but not result in a change in overall attitude to more sustainable approaches.

Behavioural and attitudinal change is more likely to become embedded through education and voluntary action rather than enforcement. Education is key to recognising the complexities inherent within environmental solutions - for example, most consumers still believe that paper bags are more environmentally sustainable than plastic ones.

There is also the real danger that consumers will continue to equate relatively trivial issues like reducing the number of plastic carriers with their contribution to reducing their greenhouse gas emissions. By focussing consumers on these less pressing issues we risk diverting their attention from the actions that could meaningfully impact on environmental threats such as a reduction in flying, increased energy efficiency and reduced food waste.

Voluntary commitment by retailers

In 2007 retailers voluntarily committed to reduce the overall environmental impact of carrier bags by 25 per cent by the end of 2008 in a joint agreement with WRAP.

Provisional figures released by WRAP in February 2008 showed retailers gave out a billion less bags compared with this time last year and had already reduced the environmental impact of plastic bags by 14 per cent. Retailers are fully committed to reaching and exceeding the targets set out in the voluntary agreement. Retailers are aiming to achieve this through a variety of methods, including:

- Promoting the sale of 'bags for life', including short-term free giveaways;
- Offering an array of 'bags for life' to fit in with consumer lifestyles;
- Removing single-use bags from till points so consumers are required to ask for bags;
- Increased engagement with customers at till point through asking if they 'need' a bag rather than 'want' a bag;
- Rewarding consumers with green bonus loyalty points when they remember to use 'bags for life';
- Increasing the amount of recycled material from which plastic bags are made;
- Extensive promotion throughout their stores of their initiatives; and
- Increased recycling facilities in the grounds of large stores.

Focusing on key issues

The BRC's climate change strategy 'A Better Retailing Climate' presents a significant number of points which retailers are seeking to action in both short and medium term. The strategy prioritises the issues which are widely agreed to be the most pressing environmental issues such as reducing carbon footprints, packaging and food waste. We are committed to engaging customers in our

efforts to tackle climate change and to give customers a clear steer on where they can make the biggest contribution.

The Irish Example

A 15 cents a bag tax (raised to 22 cents in 2007) was introduced in the Irish Republic in 2002. It has reduced the number of plastic bags given out but has had a number of unintended consequences.

The Irish Government claims the use of plastic carrier bags in Ireland has declined by 90 per cent. Defra's assessment that says 80 per cent of plastic carrier bags in the UK are re-used at least once in the home explains the increase in use of heavier gauge bin liners, refuse sacks and nappy disposal bags. In year 1 there was a 70% increase in the number of bin liners purchased, while the purchase of refuse sacks increased by around 20%.

British Retail Consortium, May 2008