

# Sustainability Committee

SC(3)-13-08 (p1):18 June 2008

## Carrier Bag Consortium - Formal Response to Sustainability Committee, National Assembly of Wales

4 June 2008

Members of the National Assembly for Wales Sustainability Committee  
Welsh Assembly Government  
Cardiff Bay  
CF99 1NA

Dear Committee Member,

### Suggested Ban or Tax on Plastic Shopping Bags

Thank you for asking our Association to provide evidence to the Sustainability Committee in their consideration of Petition P-03-63. This evidence is attached to this covering letter.

CBC is part of the Packaging and Films Association of the UK and represents the manufacturers and suppliers of flexible and plastic packaging and films used for the protection and preservation of goods. These products include crop protection film, pallet wrapping, building damp-proof membrane, medical and pharmaceutical packaging, blood bags, food packaging and protection for many other consumer goods.

Our association members represent more than 80% of the UK industry and contribute £2 billion to the UK economy. Our industry has five manufacturing sites specifically involved in manufacturing, converting or recycling plastic bags, sacks and film sheet in Wales. In addition there is a well-established industry supply chain incorporating distributors and wholesalers serving local authorities (waste sacks), hospitals (waste sacks and medical products), waste management companies (waste sacks and landfill liners) building companies (damp-proof membranes and aggregate sacks), food producers (tray liners, food bags), pack houses (fruit and vegetable bags), retailers (fresh produce bags, food packaging and carrier bags).

On the issue of plastic carrier bags, we are acutely aware that any evidence we provide might be viewed as "they would say that - wouldn't they". For this reason, the vast bulk of the attached submission has been derived from expert third parties including Government and Green NGO groups or can be sourced to published independent studies.

It is important from the outset to state that we recognise there is widespread and growing public concern in Wales and elsewhere surrounding the issues of waste, litter and damage to the natural environment. However, we believe the evidence will show that adopting punitive measures against the plastic shopping bag not only cannot resolve these issues but will create extra waste and greater environmental damage - as proven in the expert reports commissioned by the Scottish Executive recently.

To most of us who care about the environment, this may be counter-intuitive particularly when considering 'natural' substitutes such as paper and textile bags. However, we aim to prove that the plastic shopping bag offers the best overall chance of 'reduce, re-use and recycle' as well as producing the least environmental impacts across a full life cycle.

Most importantly, the reasons for resisting moves to ban or tax plastic bags are now proven following extensive work by the Cabinet Office Waste Strategy Unit (2002) and the Scottish Parliament Environment and Rural Development Committee (2006). The Scottish Parliament's ERDC released its final recommendation following a two year rigorous and expert appraisal of a Private Members' Bill intending to impose an "environmental levy" on plastic bags.

These studies cost the Scottish taxpayer an estimated £2 million and their conclusion was unanimous (including the Green Party). It resulted in the immediate withdrawal of the Bill on grounds of expert evidence. We are concerned that Welsh taxpayers' money should not be wasted on such an exercise nor should our members' jobs be jeopardised in the process.

We believe that the only way forward for Governments to ensure real change in reducing environmental impacts is to prioritise actions by tackling macro environmental issues such as transport, heating, industrial energy wastage and food waste etc and not to succumb to populist mythologies such as banning carrier bags which acts as a diversion and threatens to create even greater environmental impacts.

We hope to have the opportunity of presenting our case succinctly and answering in an honest, open and unbiased spirit any questions you may have at the Committee Meeting planned for 18 June.

Thank you again for including industry in your evidence-gathering process.

Yours sincerely

Barry Turner

## Evidence from Carrier Bag Consortium

### PET(3)-03-07 Paper 2: Banning Plastic Bags

#### **Petitioner Claim: Effect on Wildlife**

Whilst it goes without saying that plastic bags are detrimental to wildlife, few of us are aware of the actual extent of the problem. Just go to [www.google.co.uk](http://www.google.co.uk) and do an image search using the parameters ' "plastic bags" AND "wildlife" '. You may be shocked by what you see.

#### **Industry response:**

The risk to wildlife posed by plastic shopping bags has been distorted and highly sensationalised. Vehicle road kill in Wales destroys the lives of 4000 animals and birds every day. This contrasts sharply with largely anecdotal reports of land and marine creature deaths allegedly due to shopping bags - an annual figure for Wales likely to stay in single figures.

#### **Supporting Evidence:**

"It's very unlikely that many animals are killed by plastic bags, the evidence shows just the opposite." David Santillo, Marine Biologist, Greenpeace, March 2008, The Times

"Plastic bags don't figure in entanglement. The main culprits are fishing gear, ropes, lines and strapping bands. Most mammals are too big to get caught up in a plastic bag. The impact of bags on whales, dolphins, porpoises and seals ranges from nil for most species to very minor for perhaps a few species. For birds, plastic bags are not a problem either." David Laist, Marine Mammals Commission (US), March 2008, The Times

"I've never seen a (sea)bird killed by a plastic bag. Other forms of plastic in the ocean are much more damaging. Only a very small proportion is caused by bags." Prof Geoff Boxshall, Marine Biologist National History Museum, March 2008, The Times

"It's a problem when you see Governments basing their recommendations on science that's no longer accurate." Colin Butfield, World Wildlife Fund for Nature, March 2008, The Times

#### **Petitioner Claim: Effect on Our Landscape**

It is now impossible to travel anywhere without seeing some form of litter in our countryside. Whilst you expect to see this on the high street, the sight of a Mc Donald's bag hanging from an oak miles from the nearest town seems particularly perverse.

#### **Industry response:**

McDonalds bags are made of paper not plastic.

The Keep Wales Tidy Group and other well-researched Encams surveys show that plastic bags (of all types including crisp and confectionery wrappers) comprise considerably less than one fifth of 1% of all litter.

Banning plastic shopping bags would not reduce litter in Wales.

#### **Supporting Evidence:**

In 2004, a survey carried out by Encams on behalf of Incpen counted 22,790 items over 30 sites drawn from the 12 standard land uses around which LEQSE is structured and the number of carrier bags observed was 37 - equating to 0.162 percent of all litter ... Survey by Encams 2004

In a nationwide survey (22% of which was carried out in Wales) - 74% of people re-use their lightweight plastic bags (37% for bin bags and a further 37% more than once for other purposes - only 6% throw them straight away) ... Survey for DEFRA/WRAP by IPSOS MORI December 2007

#### **Petitioner Claim: By-Product of the Oil Industry**

Plastic bags are generally manufactured from polyethylene which is a by-product of oil refining. Our use of, and reliance upon fossil fuels, initially coal and latterly oil, has had a huge impact on the environment. In the interests of sustainability should we not be moving away from products that are derived from oil? Especially as the cost of that oil will become increasingly high as remaining stocks diminish.

#### **Industry Response:**

The petitioner is correct in saying that polythene is made from waste by-products. This means plastic bags do not waste oil, they are derived mainly from naphtha, ethylene, etc which would otherwise have to be flared off, creating greater emissions and pollution. Plastic bags are therefore an excellent use of otherwise waste products.

### **Supporting Evidence:**

Plastic bags use around 0.2% of oil as a feedstock. In fact, all plastic packaging of all types uses no more than 2% of total oil extraction compared with 29% for transport and 35% for heating/industry. Plastics Europe 2007

The average round trip to the supermarket is 12 miles, the petrol equivalent of 210 plastic bags (typically more than one year's usage of bags per person in the UK) ... Dr Gerard McCrum, Oxford, The Daily Telegraph 24 July 2007

(plastic bags) contribution to climate change is miniscule. The average Brit uses 134 bags a year, resulting in just (2.6) kilos out of the typical 11 tonnes of carbon dioxide he or she will emit in a year. That is one five thousandth of their overall climate impact. George Marshall, The Guardian, September 13 2007

### **Petitioner Claim: Landfill Directive**

Local authorities will have to significantly increase the amount that is currently recycled if they are to reduce the amount of matter being land-filled and thereby avoid significant fines. The banning of plastic bags will not only reduce the amount of waste being dumped but it will also provide new uses and new markets for the increased paper and card being recycled.

### **Industry Response:**

The petitioner has misunderstood the requirements of the EU Landfill Directive. This legal obligation requires member states to achieve reduction targets in degradable waste going to landfill - because the act of degradation releases greenhouse gases (primarily CO<sub>2</sub> and methane). Banning plastic bags will substantially increase the amount of degradable waste going to landfill largely through the substitution of plastic with paper and other higher volume degradable substitutes. The actual proportion of landfill taken up by plastic bags is 0.03% (calculated as 0.2% of domestic waste which in turn is up to 17% of landfill)

### **Supporting Evidence:**

"There have been unforeseen consequences in the Irish Experience ... increase in the use of paper bags which are actually worse for the environment ..." ... Ben Bradshaw, UK Environment Minister, 4 August 2006

"0.2% of the average household dustbin is plastic carrier bags ... hence a tax on plastic carrier bags alone would be unlikely to have any significant impact on (reducing) volumes of waste" Plastic Bag Tax Assessment, HM Treasury, December 2002

In Wales alone, taxing or banning plastic carrier bags would create an extra 8,000 tonnes of waste going to Welsh landfill. (The equivalent of an extra 150,000 tonnes of waste created across the UK). Because most of this would be degradable substitutes for plastic this would directly contravene the targets of the EU Landfill Directive and incur penalties on the UK. Extrapolated from Scottish Executive Impact Assessment Studies 2005 by PAFA 2008

Taxing plastic bags will send more paper to landfill where it will degrade to give off greenhouse gases in direct contravention of the EU Landfill Directive. Plastic remains inert and will not give off CO<sub>2</sub> or Methane in landfill. Packaging and Films Association 2002.

A levy on plastic bags in Ireland only made matters worse... people underestimate how many plastic bags are used to put out recycling or are substituted for plastic bin bags. "We have got to remember that taxes and levies can have perverse effects - such as making people use more plastic not less" ... Liz Goodwin, Chief Executive WRAP (Government's Waste Resources Action Programme) The Daily Telegraph 28 Sept 2007

### **Petitioner Claim: Political Reasons**

This is a golden opportunity for Wales to use its extended legal powers to set itself apart from the other countries of the British Isles and the world. Ireland has introduced a tax on plastic bags which has resulted in their reduced use (although there is now some evidence that this trend is beginning to reverse). Scotland seems to have fudged the issue, with some MSPs arguing that a tax on plastic bags would be unfair on the poor and that a ban would add additional bureaucracy. Let us act decisively! I want to see Wales leading the way. I want us to be recognised as a country that has wholeheartedly embraced sustainability - not one that simply talks about it and then disregards the future for the more immediate economic interest. Lets do something to put us on the map!

### **Industry Response:**

The producers and distributors of plastic bags are in turn part of a wider petrochemicals industry which produces polymers and pharmaceuticals for beneficial use in all sectors of modern living. The industry is a significant economic and social contributor to Wales and recognises and respects the need for the Welsh Assembly to proactively champion the rights and well-being of the people of Wales. Our support in this respect is long-established and ongoing.

We cannot agree, for the reasons stated here and founded in fact and science, that the pursuance of a ban (or tax) on plastic bags would improve the sustainability credentials of Wales or the political stature of its Assembly. In fact, the imposition of a tax (or any other

punitive measure against our products) would bring no provable environmental benefits, would unfairly discriminate against those who have the lowest income and the least mobility and, by discriminating against a single material operating in a free market would also, in our opinion, violate EU and UK legislation designed to protect the freedom of choice of individual retailers and shoppers as well as the right of our businesses to trade in a free, fair and competitive environment.

### **Supporting Evidence:**

The Government is irresponsible to jump on a bandwagon that has no base in scientific evidence. This is one of many examples where you get bad science leading to bad decisions which are counter-productive. Attacking plastic bags makes people feel good but it doesn't achieve anything. Lord Taverne, Chairman of Sense about Science, March 2008, The Times

Taxing plastic carrier bags in Scotland will produce an estimated 13,500 extra tonnes of waste ...." AEAT Consulting for Scottish Executive, 2005

"A number of unintended consequences appear likely to be connected with the proposed levy ... the net environmental impact is an issue of considerable dispute ... the Committee therefore recommends that Parliament does not agree to ... the Bill" ... Unanimous Conclusion (including the Green party) of the Scottish Parliament, Environment and Rural Development Committee, after two years of investigations, 2006

The use of plastic bags in Ireland (including substitute bin liners) analysed through HM Customs figures shows the amount of plastic bags imported into Ireland has actually gone up after their bag tax from 29,846 tonnes in 2001 to 31,649 tonnes in 2006... HM Customs statistics (analysed by Mike Kidwell Associates/PAFA 2007)

"This (voluntary) agreement is working - with retailers offering shoppers reusable bags-for-life. We don't think a ban or levy is the right way to go. In Ireland, people just bought more bin liners to replace free carrier bags, so the volume of waste stayed the same." ... DEFRA, The Guardian, 3 October 2007

"But until supermarkets reduce the energy used in their stores, minimise food miles and treat farmers better, saving a few plastic bags is just window dressing."...Tony Juniper, Friends of the Earth, Daily Mail, 28 January 2008

Submission Ends