

Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith /
Climate Change, Environment and Infrastructure Committee
Bil drafft Diogelu'r Amgylchedd (Cynhyrchion Plastig Untro) (Cymru)/
Draft Environmental Protection (Single-use Plastic Products)(Wales) Bill
SUP_28
Ymateb gan Cyngor Bwrdeistref Sirol Caerffili / Evidence from Caerphilly County
Borough Council

Please find below Caerphilly County Borough Council submission on the Draft
Environmental Protection (Single-use Plastic Products) (Wales) Bill.

– **Whether a Bill is needed to introduce a ban on commonly littered single-use plastic items;**

Tackling litter is an ongoing concern and priority for communities across Caerphilly county borough council. We currently have a cleansing budget of approximately £4.5M and anything that helps us reduce this demand would be helpful. We agree that a legislative intervention is required to address commonly littered single-use plastic items. A deposit return scheme and Extended Producer Responsibility Regulations is already on the statute books. Single use plastic litter forms a very small amount of the Authority's Waste tonnage (much less than 1% of the 100, 000 tonnes of waste generated each year).

– **The advantages and disadvantages of using a Bill rather than secondary legislation to introduce a ban;**

Rather than ban single use need to continue to develop and the eco friendliness and recyclability of single use products.

– **Whether the provisions of the draft Bill will deliver the policy intention;**

We believe that the provisions of the draft Bill will deliver the policy intention. One potential consequence is that the market will substitute these with products which will be similarly littered, albeit with lesser environmental impact where they are biodegradable. The application of the Bill to web/remote sales is not completely clear. The offence is to supply to a consumer in Wales and so we assume that if a website offers to supply the goods then they are committing an offence as the draft Bill says:

Where P arranges for a product to be delivered to a consumer, P supplies the product when it is delivered to the address provided by the consumer.

There is no reference to cross border, suppliers in England etc. so we assume that the above is meant to cover it. Awareness will be an issue in England if there are not similar restrictions there, and for internet suppliers from other countries too.

The provisions relating to carrier bags are a little complex and risk being confusing for business.

- **Whether there are any potential barriers to the implementation of the draft Bill’s provisions (including the United Kingdom Internal Market Act 2020);**

No comment.

- **Whether the powers in the draft Bill for Welsh Ministers to make subordinate legislation are appropriate;**

Yes.

- **Whether there are any unintended consequences arising from the draft Bill;**

As mentioned above, whether the market will substitute these with products which will be similarly littered, albeit with lesser environmental impact where they are biodegradable. Risk of deterioration in hygiene standards, more product damage from packaging which is less robust, enhanced transport costs of heavy packaging.

- **The financial implications of the draft Bill (including for businesses and consumers).**

Expectations in relation to Local Authority enforcement of these proposed provisions must be accompanied by additional resources in full as, without dropping other priorities, there is no spare capacity. We assume that Welsh Government would lead on awareness raising and publicity and with provision of assets that could be used locally as appropriate. Need to undertake an independent comprehensive life cycle analysis on the single use sector and assess the energy balance /logistics of product change

