



Arbenigwyr mewn Busnes
Experts in Business

Climate Change, Environment & Infrastructure Committee
Welsh Parliament
Cardiff Bay
Cardiff
CF99 1SN

October 2022

Dear Chair,

Firstly, I would like to express our thanks for inviting the Federation of Small Businesses to give evidence to the Climate Change, Environment and Infrastructure Committee on the draft Environmental Protection (Single-use plastics) Bill. SMEs represent more than 99% of businesses in Wales and so will be a significant stakeholder in achieving Net Zero and plastic pollution aspirations.

We listened with interest to the evidence session with the Minister for Climate Change in the Committee oral evidence session on Thursday 29th September. We feel however that the Minister's suggestion that businesses who are unaware of the proposals "must have been living under a rock" reflects a particularly unhelpful and concerning sentiment.

The list of proposed prohibited items has itself been a continuing evolution. In 2020, the Welsh Government undertook a full consultation to explore the banning of nine single-use plastic items through secondary legislation. However, officials then indicated an intention in 2022 to expand the remit of the proposals to include wet wipes containing plastic and plastic carrier bags. The opportunity to gather and provide evidence at this point was extremely limited and this was a concern we expressed to the Minister in a letter sent to her. More recently, the Welsh Government has again broadened the scope of the legislation. As such, presuming that small businesses will be aware of the complex changes is a mistaken starting point and it is vital that Welsh Government play their part in proactively communicating what is expected of businesses.

As you will be aware, small businesses across Wales have encountered unprecedented difficulties over recent years. From business closure through the pandemic to spiralling energy costs and supply chain disruption, SMEs have been forced to weather significant challenges with many business owners experiencing a significant personal toll too. Against this backdrop, comments of this nature are counterproductive and may serve to undermine the positive attitudes towards responsibility that Wales' small business community feels around sustainability.

Our research consistently demonstrates that the overwhelming majority of SMEs recognise the role that they will have to play in achieving climate targets. However, in an FSB Wales 2021 survey only 24% felt they 'know enough' about the Welsh Government's policy on the environment, which indicates a substantial knowledge gap - a gap which the Government should be actively seeking to fill. This also demonstrates the need for a much clearer articulation of such policies for business - including this Bill.

Within the context of this legislation, there is a clear need to communicate the complexity of provisions effectively - through a targeted information campaign - and to support small businesses to understand and explore alternatives to the prohibited materials. By the Welsh Government's own admission in the Explanatory Memorandum and Regulatory Impact Assessment, the veracity of



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evidence for some items is stronger than others – demonstrating an uneven landscape of understanding, even by experts.

As indicated by the WLGA in their written evidence to the Committee, the implementation of minimum pricing legislation was preceded by around 2 years of Welsh Government and local authority planning and collaboration on a “communications strategy, mailings to businesses and training for enforcement officers. Once the legislation was implemented, local authorities (trading standards teams) conducted targeted education and inspection work. This allowed for face-to-face discussion with businesses, who could obtain further advice and help to secure compliance with the new requirements.” It should be recognised that the proposed legislation on single-use plastics is more extensive, yet the assurances around support and public awareness remains unclear.

We look forward to hearing the Committee’s view on the conclusion of the evidence gathering into these measures and we hope those conclusions will inform the way in which Welsh Government proceeds and seeks to engage the business community.

Yours sincerely,

A handwritten signature in red ink, appearing to read 'Brett John', with a horizontal line underneath.

Brett John
Deputy Head of Policy (Wales)