

Consultation on the proposal to extend the single-use plastic bag charge to all retailers and to increase the minimum charge to 10p: A Wildlife and Countryside Link response

February 2019

Wildlife and Countryside Link (Link) is the largest environment and wildlife coalition in England, bringing together 49 organisations to use their strong joint voice for the protection of nature. Our members campaign to conserve, enhance and access our landscapes, animals, plants, habitats, rivers and seas. Together we have the support of over eight million people in the UK and directly protect over 750,000 hectares of land and 800 miles of coastline.

This consultation is supported by the following Link members:

- A Rocha UK
- Buglife
- Campaign to Protect Rural England
- Environmental Investigation Agency
- Friends of the Earth
- Institute of Fisheries Management
- International Fund for Animal Welfare
- Marine Conservation Society
- MARINELife
- ORCA
- RSPCA
- The Wildlife Trusts
- Whale and Dolphin Conservation
- World Wildlife Fund

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:

Non-Governmental Organisation

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

Yes

Single-use carrier bags (SUCBs) are among the most avoidable of single-use plastics, with reusable alternatives widely available. While SUCBs are just one component of the plastic waste stream, the success of bag charges in the UK have provided an important gateway to addressing systemic issues in plastic waste prevention and management.

In 2015, England introduced a 5p charge on single-use plastic bags sold by large retailers, following Scotland in 2014 and Wales in 2011. This led to a dramatic fall in their use by over 80%, and UK-wide efforts may have already contributed to a reduction of plastic bags observed in the marine environment.¹ Also of significance is that the charge has helped shift public attitudes and behaviour towards waste reduction and reuse. One in four people in England 'often or always' took a single-use bag before the charge, dropping to one in 10 people after; and following the successful introduction of the charge, people have become more supportive of other plastic reduction measures.² These are important steps towards challenging the single-use culture that underpins the

¹ T. Maes, J. et al, 2018. Below the surface: Twenty-five years of seafloor litter monitoring in coastal seas of North West Europe (1992–2017), Science of The Total Environment, Volume 630, Pages 790-798. Available at: <https://www.sciencedirect.com/science/article/pii/S0048969718306442?via%3Dihub>

² Poortinga, W. et al, 2016. The English plastic bag charge: Changes in attitudes and behaviour. Available online at: <http://orca.cf.ac.uk/94652/>

unsustainable flow of single-use plastic produced, consumed and leaking into the environment each year. We therefore welcome that the government is looking to further cement the success of the bag charge by extending its remit to cover a wider range of stores.

As the government's figures show, small businesses circulated an estimated 3.6 billion SUCBs in 2017 alone, far surpassing the 1.2 billion sold by the largest grocery retailers.³ Given the widespread support among convenience stores – with two thirds supportive of mandatory SUCB charging in England and 42% of independent retailers already charging for them⁴ – extending the legislation is a logical next step to reduce these numbers. Actions taken by convenience chains have already proven effective, with McColl's Retail Group reporting a 90% reduction in SUCBs over 12 months after introducing a 5p charge (April 17-April 18).⁵

As noted in 2014 by the Association of Convenience Stores, inconsistent legislation on bags between large and small stores sends confusing messaging to customers.⁶ Extending the legislation would reinforce the message that SUCBs need to be avoided on every occasion. In Scotland and Wales, the bag charge already applies to all retailers, and so it would be consistent to bring England in line. Beyond SUCBs, this step could act as a useful catalysis to engage convenience chains and smaller stores on wider sustainability issues. These firms generally appear behind the curve on actions to reduce plastic pollution, with fewer initiatives underway throughout their supply chain than leading British supermarkets.⁷

To avoid the negative environmental impacts of a simple substitution of one single-use material for another, England should consistently apply the charge to paper bags too. In Wales, Scotland and Northern Ireland, most types of paper bags are included in the charge, whereas in England these are exempt. In 2014, the Environmental Audit Committee noted: *"Exempting paper bags from the charge... would weaken the message to reuse bags, diminish the impact of the charge and the likely reduction in the number of bags used and associated environmental benefits. The Government should therefore include paper bags in the charge"*.⁸ This conclusion stands today, and we encourage England to follow the lead of other UK countries.

Another area to consider extending the charge to is ultra-lightweight plastic bags used for fruit and vegetables. 1.3 billion of these were consumed by 10 major UK supermarkets, as reported in a 2018 survey of the sector.⁹ The government should look to progressively phase these out, beginning with the introduction of a charge, and aiming to ban them in the medium-term. This would require additional supportive measures to encourage retailers to roll out reusable produce bags and loose product ranges. This could be done through funding research and development in scalable refillable formats and close-loop packaging systems, citizen and corporate education campaigns, and encouraging companies to provide incentives for packaging re-use.

As well as extending the policy to include a wider number of stores and bag types, changes should be made to close the loophole associated with online shopping, where customers are often offered unlimited bags for 40p.¹⁰ There have been various reports in the media indicating excessive bag usage for online purchases.¹¹

³ https://consult.defra.gov.uk/environmental-quality/extending-the-single-use-bags-charge/supporting_documents/carrierbagsconsultdocument1.pdf

⁴ Forecourt Trader, 2018. Trade associations help members over plastic bag charging. Available at: https://forecourtrader.co.uk/news/archivestory.php/aid/14803/Trade_associations_help_members_over_plastic_bag_charging.html

⁵ According to data obtained by EIA and Greenpeace UK through their supermarket survey, Checking out on Plastics: <https://checkingoutonplastics.org/wp-content/uploads/2018/11/Checking-out-on-plastics.pdf>

⁶ Environmental Audit Committee, 2014. Plastic Bags hearing. Available at: <https://publications.parliament.uk/pa/cm201314/cmselect/cmenvaud/861/86105.htm#note86>

⁷ According to data obtained by EIA and Greenpeace UK through their supermarket survey, Checking out on Plastics

⁸ Environmental Audit Committee, 2014. Plastic Bags hearing. Available at: <https://publications.parliament.uk/pa/cm201314/cmselect/cmenvaud/861/86105.htm#note86>

⁹ <https://checkingoutonplastics.org/wp-content/uploads/2018/11/Checking-out-on-plastics.pdf>

¹⁰ For example, see https://groceries.asda.com/terms_and_conditions

¹¹ For example, see <https://www.dailymail.co.uk/femail/food/article-5325877/Supermarkets-send-plastic-bags-online-shops.html> ; <https://www.telegraph.co.uk/news/2018/12/24/supermarkets-accused-using-excessive-unnecessary-plastic->

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?

Yes

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

Yes

Since the introduction of the 5p charge in 2015, there has been a significant decrease in the number of bags being found in the marine environment, as reported by the Marine Conservation Society in Figure 1.

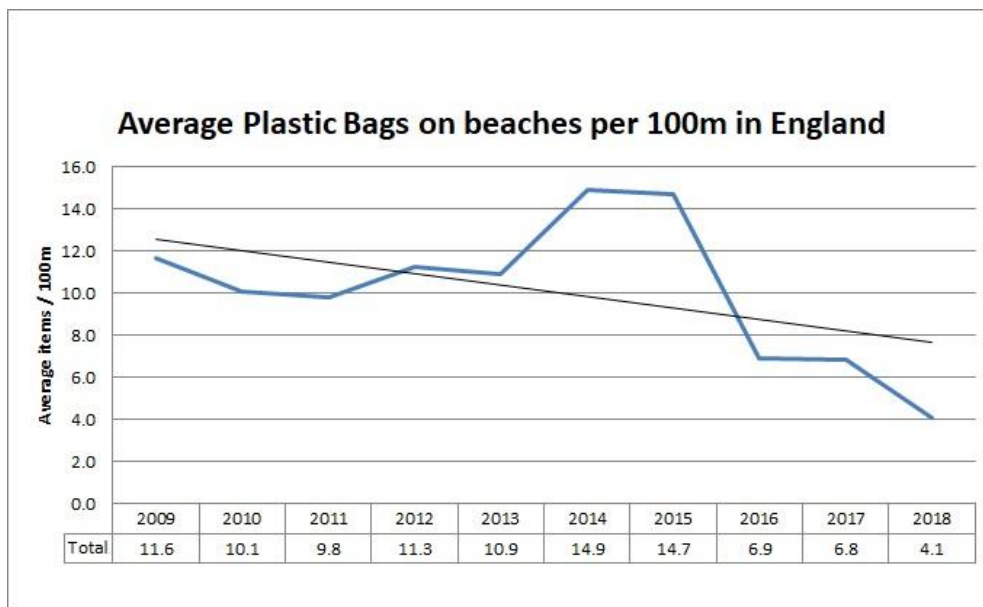


Fig 1. Number of bags on English beaches 2009 – 2018.

Therefore, we welcome that the government is looking to increase the charge on single-use plastic bags, but urge it to go further by banning these unnecessary items altogether, joining a growing number of countries, states and cities that have already done so.¹² We also call for a minimum price increase for so-called bags for life (BFL). There is evidence that, given their low retail value, many customers view BFLs as a single-use option – with the average household using 44 in 2017.¹³ Given their higher plastic content and the projected future increase in their sales, a lack of intervention could jeopardise the environmental gains achieved through the SUCB charge. Therefore, we propose a charge of at least 60p to be introduced to incentivise reuse and prevent BFLs turning into a single-use option.

Banning the bag

The government estimates that even with the price of a SUCB at 10p (Table 11 in the Impact Assessment), a total of 13,343 million SUCBs will be used between 2018 and 2028, in addition to billions of BFL, paper bags and bin liners. This is a totally unnecessary waste stream and environmental risk, given the extensive availability of

[bags/](https://www.thesun.co.uk/news/6814892/mum-of-three-furious-as-tesco-deliver-shopping-with-17-unwanted-plastic-bags-and-now-the-supermarket-faces-5k-fine-for-ignoring-5p-charge/) ; <https://www.thesun.co.uk/news/6814892/mum-of-three-furious-as-tesco-deliver-shopping-with-17-unwanted-plastic-bags-and-now-the-supermarket-faces-5k-fine-for-ignoring-5p-charge/>

¹² UNEP, 2018. Legal Limits on Single-Use Plastics and Microplastics: A Global Review of National Laws and Regulations. Available at:

http://wedocs.unep.org/bitstream/handle/20.500.11822/27113/plastics_limits.pdf?sequence=1&isAllowed=y

¹³ Reported in <https://inews.co.uk/news/consumer/supermarkets-one-billion-bags-for-life-plastic-waste/>

reusable alternatives. The government is committed in its 25 Year Environment Plan to eliminate all avoidable plastic waste. Banning SUCBs would be clearly aligned with this commitment.

Each plastic bag that enters the natural environment poses a significant potential risk to marine, terrestrial and soil ecosystems. Used on average for 20 minutes, they remain in the natural environment for centuries, fragmenting into microplastic particles which can cause harm to marine and soil dwelling microorganisms, with potential human health implications if they work their way further up the food chain.¹⁴ In a 2016 scientific review, plastic bags were identified as one of the most dangerous items to marine wildlife due to the high risk of entanglement and tendency of animals such as sea turtles and marine mammals to mistake them for food, second in impact only after lost fishing gear.¹⁵ Plastic bags have been reported as a contributing factor to cetacean mortalities, blocking the digestive system and causing starvation.¹⁶ They also pose risks to benthic marine ecosystems, with both conventional and 'biodegradable bags' found to rapidly alter marine assemblages and the ecosystem services they provide.¹⁷ Terrestrial fauna can climb inside plastic bags and suffocate, attempt to eat them and choke, and become entangled which can cause injury and death.¹⁸

An ever-increasing number of plastic bag bans are being implemented around the globe, notably in African and Asian countries.¹⁹ Kenya's plastic bag ban – the toughest in the world, with up to four years' imprisonment or fines of \$40,000 (£31,000) for anyone producing, selling or carrying a plastic bag – has had significant public health, environmental and social economic benefits, so much so its adoption is being considered in neighbouring East African countries.²⁰

In Australia, jurisdictions including South Australia, the Australian Capital Territory, Northern Territory and Tasmania have implemented bans on plastic bags with a thickness of less than 35 microns. This has significantly reduced plastic bag littering and increased the proportion of shoppers bringing their own bags.²¹ It was observed that success was undermined where alternative bags were offered free of charge (including biodegradable, paper and low-density polyethylene (LDPE) options), leading to a substitution of one single-use item for another. Analysis conducted on behalf of Australia's Victorian Department of Environment, Land, Water and Planning thus concluded the best means to reduce the consumption and littering of plastic bags is through a comprehensive ban on bags, including HDPE, LDPE and biodegradable plastic carriers.²²

The government says its rationale for not currently considering an outright ban is that SUCBs have a role to play "in spontaneous, unplanned purchasing". However, to dismantle the single-use culture underpinning the plastic pollution crisis, it is critical to fundamentally challenge this behaviour and encourage a wholesale shift to reuse on every occasion – including 'unplanned' shopping trips.

¹⁴ For example, see Smith, M. et al, 2018. Microplastics in Seafood and the Implications for Human Health, Current Environmental Health Reports, 5:3, p 375-368. Available at: <https://link.springer.com/article/10.1007/s40572-018-0206-z>

¹⁵ Wilcox, C. et al, 2016. Using expert elicitation to estimate the impacts of plastic pollution on marine wildlife, Marine Policy, Volume 65, pp 107-114. Available at: <https://www.sciencedirect.com/science/article/pii/S0308597X15002985>

¹⁶ For example, see Stephanis, R. et al, 2013. As main meal for sperm whales: Plastics debris, Marine Pollution Bulletin, Volume 69, Issues 1–2. Available at: <https://www.sciencedirect.com/science/article/pii/S0025326X13000489>

¹⁷ Green, D. S., Boots, B., Blockley, D. J., Rocha, C. & Thompson, R. (2015) Impacts of Discarded Plastic Bags on Marine Assemblages and Ecosystem Functioning. Environmental Science & Technology 49, 5380–5389.

¹⁸ For example <https://www.nottinghampost.com/news/local-news/deer-hit-car-newark-after-2222473> ; [http://www.keepbritaintidy.org/sites/default/files/resource/KBT Journal of Litter and Environmental Quality June2017.PDF](http://www.keepbritaintidy.org/sites/default/files/resource/KBT%20Journal%20of%20Litter%20and%20Environmental%20Quality%20June2017.PDF)

¹⁹ For example, see: UNEP, 2018. Single-use plastics: A roadmap for sustainability. Available at:

<https://www.euractiv.com/wp-content/uploads/sites/2/2018/06/WED-REPORT-SINGLE-USE-PLASTICS.pdf>

²⁰ For example: <https://www.theguardian.com/world/2018/apr/25/nairobi-clean-up-highs-lows-kenyas-plastic-bag-ban>

²¹ https://s3.ap-southeast-2.amazonaws.com/hdp.au.prod.app.vic-engage.files/1915/0580/1564/Plastic_Bags_Ban_Options_-_Cost_Benefit_Analysis_Report.pdf

²² Marsden Jacob Associates, 2016. Plastic Bags Ban Options – Cost Benefit Analysis. Available online at: https://s3.ap-southeast-2.amazonaws.com/hdp.au.prod.app.vic-engage.files/1915/0580/1564/Plastic_Bags_Ban_Options_-_Cost_Benefit_Analysis_Report.pdf

Another reason the government rejects an outright ban is because “*alternative bag types can potentially have a significantly higher carbon impact than single-use carrier bags*”. This statement, and life-cycle assessments on which it is based, does not consider the environmental impact of plastic vs paper from a marine ecotoxicity perspective, nor the relative impact of plastic on marine, terrestrial and soil fauna and microorganisms when it leaks into the natural environment. As noted in our response to Question 5, a holistic approach is required, rather than one that assumes a simple substitution of one single-use item for another. We are therefore encouraging the government to extend the charge to cover single-use bags made of other materials to mitigate the risks associated with a simple substitution. The introduction of additional measures to incentivize reusable and refillable options would further reduce potential negative environmental implications.

Falling short of phasing out SUCBs altogether, the government must consider increasing the charge beyond 10p. This relatively small price increase may fail to deter consumers who have already absorbed and accepted the 5p charge. Recent polling found that 58% of people were willing to pay 20p for a supermarket carrier bag. Out of that 58%, 34% would pay as much as 50p and 6% said £1.²³ The Impact Assessment notes that a 90% reduction was achieved in Republic of Ireland by setting a charge six times higher than the price consumers reported that they were willing to pay; whereas a 10p charge would only double the current price.

Bags for Life

We urge the government to increase the minimum charge for Bags for Life (BFL) to prevent a rise in their usage from undermining the positive environmental outcomes of the SUCB charge. BFL are exempt from legislation in England if they are sold for 5p or more, returnable, 50 to 70 microns thick and at least 404mm by 439mm. Many major grocery retailers are phasing out SUCBs in favour of BFLs, including Asda, Iceland, Lidl, Tesco, McColl’s, Morrisons and Waitrose.²⁴ BFL are currently charged at between 5 and 10p by stores. By comparison, in Ireland, bags designed for re-use must be sold for 70 cents (roughly 60p) or more.²⁵

Containing at least double as much plastic as the SUCB,²⁶ it is critical to prevent BFLs from becoming seen as a single-use option. Indeed, supermarket Iceland stopped selling 5p plastic bags in 2018 but reported that despite removing quarter of a billion SUCBs from circulation, the actual volume of plastic remained unchanged.²⁷ A rise in plastic tonnage was also reported in Taiwan after the introduction of a levy on sales of SUCBs, with customers swapping to thicker plastic options.²⁸ A simple switch could lead of a range of negative environmental outcomes. In the Northern Territory of Australia, five years after the ban on thin plastic bags (below 35 microns) was introduced, a survey revealed that plastic pollution was increasing, with correlation to a behavioural change of people buying thicker bags but treating them as single-use items.²⁹ A simple substitution of SUCBs for BFL could also have negative climate impacts. To limit the carbon footprint of a BFL to that of a conventional SUCB, a thin low-density polyethylene (LDPE) BFL needs to be used at least four times, and thicker non-woven polypropylene (PP) BFL needs to be used at least 11 times.³⁰

²³ Business Waste survey, 2017 reported in: <https://www.edie.net/news/5/Plastic-bag-charge-UK-sustainability-statistics-from-Defra-2017/>

²⁴ EIA and Greenpeace, 2018. Checking out on Plastics. Ibid.

²⁵ Department of Communications, Climate Action and Environment, 2019. Available at:

<https://www.dccae.gov.ie/en-ie/environment/topics/waste/litter/plastic-bags/Pages/FAQ's.aspx>

²⁶ See <https://www.express.co.uk/news/uk/1063859/supermarkets-plastic-bags-for-life-increase-waste-1-18-billion>

²⁷ See <https://www.express.co.uk/news/uk/1063859/supermarkets-plastic-bags-for-life-increase-waste-1-18-billion>

²⁸ Lam, S.P. & Chen, J.K. (2006) What Makes Customers Bring Their Bags or Buy Bags from the Shop? A Survey of Customers at a Taiwan Hypermarket. *Environment and Behaviour*, 38, 318-332.

²⁹ As reported in: Watson, C. 2013. Plastic bag use still rife despite South Australia’s shopping bag ban. *AdelaideNow*.

Available <http://www.adelaidenow.com.au/news/south-australia/plastic-bag-use-stillrife-despite-south-australias-shopping-bag-ban/news-story/a02398d8295da04dcbe04b5343377186?sv=467d4722e2060125ce98c7a555a90d2f>

³⁰ See:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/291023/scho0711b_uan-e-e.pdf

Concerningly, evidence suggests that a significant number of people are using the BFL as a single-use option. The average number of BFL per household in Britain was 44 in 2017,³¹ indicating that customers are using, on average, almost one new BFL per week. In England, Sainsburys and Asda saw an increase in 5p BFL bags sold in 2017/18 compared to 2016/17, rising by 4% and 16% respectively.³² A breakdown of the BFLs sold by major grocery retailers obtained by EIA and Greenpeace UK is provided below:

- Tesco issued 430 million bags for life in the 12 months to the end of June 2018
- Sainsbury's 268 million
- Morrisons 140 million
- Aldi 52 million
- Co-op 28 million
- Waitrose 22 million
- M&S 14 million
- Iceland 3.5 million

The government's Impact Assessment (Table 11) estimates an increase in use of BFL from 713 million in 2018 to 1036 million in 2028. If the purpose of a bag for life is to be used repeatedly, these figures suggest a failure to incentivise reuse. Furthermore, assuming a BFL contains at least double the plastic content of a SUCB, based on the Impact Assessment's figures, from 2021 onwards BFL will overtake SUCB in terms of the volume of plastic used (1,464 million SUCBs vs 832 million BFLs). As such, the 68% reduction in numbers of SUCBs will correspond with a much more conservative reduction in plastic tonnage.

Noting that bags intended for reuse fall outside the Climate Change Act 2008, we nonetheless encourage the government to address this loophole. Ireland, recognising the need to incentivise reuse, has made reusable plastic bags exempt from its charge provided the retailer charges at least 70 cent (roughly 60p). The UK should consider a price rise in BFL to a minimum of at least 60p, similar to the Irish example.

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?

Yes

The relatively small increase to 10p may fail to deter consumers who have already absorbed the 5p charge. As previously noted, the 90% reduction in the Republic of Ireland, which is used as the example in the Impact Assessment, was achieved by setting a charge six times higher than the price consumers reported that they were willing to pay. Recent polling found that 58% of people were willing to pay 20p for a supermarket carrier bag. Out of that 58%, 34% would pay as much as 50p and 6% even said £1.³³

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?

Yes

We agree with the assessment that there is likely to be a significant rise in the sales of BFL, although it is difficult to predict with accuracy how sharp this will be. As noted in response to Question 7, there are environmental concerns associated with a rise in sales of BFL and their propensity to be used as a single-use option. It is unclear how the Impact Assessment has accounted for the GHGs emissions, litter and waste management costs this could have, which seem likely to partially undermine the savings associated with a fall in sales of SUCBs. We

³¹ The Times, 2018. Scourge of more than 1bn plastic 'bags for life'. Available at:

<https://www.thetimes.co.uk/edition/news/scourge-of-more-than-1-billion-plastic-bags-for-life-cjg0cm8ds>

³² UK government, 2018. Single-use plastic carrier bags charge data in England for 2017-18. Available at:

<https://www.gov.uk/government/publications/carrier-bag-charge-summary-of-data-in-england/single-use-plastic-carrier-bags-charge-data-in-england-for-2017-to-2018>

³³ Business Waste survey, 2017 reported in: <https://www.edie.net/news/5/Plastic-bag-charge-UK-sustainability-statistics-from-Defra-2017/>

strongly recommend that these potential consequences are evaluated, with action taken to progressively reduce sales of bags of life.

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)?

Yes

Transparency is vital to measure the impact of the legislation and to ensure year-on-year accountability. Such data can also be used as a case study for other countries considering taking action on plastic bags. We encourage the government to mandate reporting on all bag types (BFL, paper, ultra-lightweight produce bags), requesting unit and tonnage data. This is important for tracking both the number of bags issued, and overall volumes of different materials associated with their production.

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)?

Yes. Such bags are likely be taken abroad where they could then contribute to the litter problem of other countries, some of which may only have basic waste infrastructure.

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

Yes, as soon as possible

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?

As indicated in Q5 the majority of small retailers at the time of the original consultation indicated that they wanted to also be included. This takes away this anomaly and creates a level playing field for all retailers.

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.

The plastic bag charge has been an important gateway issue for engaging business and citizens on the importance of reducing single-use plastic, and we welcome that the government is looking to cement the success of this legislation.

We welcome the extension of the charge to smaller retailers in England, and strongly encourage paper, 'biodegradable' and ultra-lightweight produce bags to be included in the legislation too, in line with other UK nations. Substituting one single use item for another is not the solution to the plastic pollution problem. Especially as current science suggests and infrastructure allows, there is no proven biodegradable plastic, particularly in the marine environment.

We believe the UK could go further by banning the single-use bag altogether, as an easily avoidable and unnecessary waste stream and environmental risk. Short of this, we urge the government to increase the charge higher than 10p, since it is unclear whether this would be enough to incentivize a significant reduction.

We also call for a minimum price increase for so-called 'bags for life' to at least 60p, similar to the Irish example where bags designed for re-use must be sold for 70 cents (roughly 60p) or more. Given their higher plastic content and the projected future increase in sales, a lack of intervention could risk jeopardising the environmental gains achieved through the SUCB charge.

The government should consider additional measures to encourage and incentivize reuse and reduction of all bag types. This could be done through funding research and development in scalable refillable formats and close-

Wildlife and
Countryside



loop packaging systems, citizen and corporate education campaigns, and encouraging companies to provide incentives for packaging re-use.