

Consultation on proposed changes to the Carrier Bag Levy: Response from the Advisory Committee on Packaging

1. We believe bringing in a charge on carrier bags was appropriate because most were made of plastic and not being reused or recycled. We agree that reduction in the number of carrier bags has contributed to a better environment as well as better awareness of these issues among the public.
2. With regard to your specific proposals, we have the following comments:
 - (i) We agree that bags priced at above 20p in retail should not be exempt from a levy. More expensive bags suggest a level of affordability in a consumer and a levy promoting environmental benefits is appropriate and would be affordable.
 - (ii) Gusseted liners should not be exempt if the levy is up to 10p a case. A higher levy could seriously impact negatively on some critical use categories.
 - (iii) Exemptions for bags used on board public transport should not be removed. Consumers shop only for essentials when using these and should not be burdened with carrying an extra bag to avoid a charge. **This exemption should only be removed if there is evidence that such bags total up to a large amount of material or make up a substantial share of unrecycled material.**
 - (iv) The exemption for paper bags up to 175x260mm should not be removed because **paper is easily recyclable** and consumers should be encouraged to move from less recyclable material such as plastic to paper. Such a size is not unreasonable for retail buying. (We acknowledge the lifecycle carbon dioxide and environmental costs of paper have to be evaluated but would prefer to wait for more detailed evidence.)
 - (v) The exemption for plastic bags up to 125x125mm should be removed.
 - (vi) The exemption for paper bags 80x50x155mm should not be removed, because of the logic explained above.
 - (vii) We agree with an exemption for all material except plastic up to 125x50x155m. Most other bags are of jute or cloth and are usually reused many times or recycled. Such a move would also make people move from plastic to compostable bags.
 - (viii) If all your proposed changes to exemptions are carried out and if the levy is increased to 20p or more, **it will disadvantage small shops/corner stores, ie, non-chain stores, and their customers in particular, since the average purchase volume from these shops is smaller and less planned.**
3. **You have asserted that consumers have shifted to thicker, heavier carrier bags since the last levy was imposed but these are not being reused. We would welcome evidence to show that they are not being reused.** Our experience is that most consumers have shifted to heavier plastic bags which are usually reused five to 10 times at least. A smaller share of consumers has shifted to jute or cloth bags which are reused possibly for a long time and recycled. An experiment to see the effect on consumer behaviour and shop administration could be conducted by treating, say, 5p as a refundable deposit if the bag is returned after use by the consumer.

4. **We do not support the levy going from 5p to more than 10p per bag.** That is adequate for the habit change required and to collect money for environmental work. A higher charge like a 20p charge would not only affect negatively poorer people (and smaller shops) but also result in **many economic changes which your impact and risk assessments do not consider.** First, your assumption that there will be no impact on about 35% of people already buying bags costing more than 20p is incorrect as retailers are unlikely to eliminate their own charges as imposed presently. Secondly, not only would poorer people and smaller shops be negatively affected but this would also add to inflationary pressures in the economy. Thirdly, a uniform charge will disincentivise intrinsically cheaper carrier bag material such as paper in preference for more expensive plastic, jute or cloth. Fourthly, it would increase the incentive for home delivery orders and, apart from impact on physical delivery stores and community life, involve the need to calculate net costs and benefits of home delivery carrier bags or alternatives.

5. **Overall, we recommend a maximum charge of 10p per carrier bag and if any material has to have a higher charge it should be plastic and up to 15p.** A 10p charge would reduce some administrative costs for retailers which operate in England and Scotland too, and allow for learning from comparisons between Northern Ireland and these jurisdictions. It would also reduce confusion among the people who travel across.

6. Our answers to your specific questions are as follows:
 - (3) Strongly agree that the number of carrier bags has reduced.
 - (4) Yes, environmental benefits awareness has increased.
 - (5) Less pollution has been the main benefit.
 - (6) We take bags with us to shop all the time.
 - (7) Yes, the 5p levy has discouraged us from buying a bag.
 - (8) Yes, a greater levy would encourage us to bring a bag along.
 - (9) Strongly agree that a greater levy would discourage us from buying a bag.
 - (10) Neither agree nor disagree about regulations to do with exemptions (see above).
 - (11) Disagree on new exemptions.
 - (12) No, paper should not be removed from exemptions.
 - (13) No, exemptions should remain for public transport.
 - (14) Agree that all bags should have a levy.
 - (15) Strongly agree that proceeds be used for environmental work.