



Councillor Claudia Webbe

Executive Member for Environment and Transport
Labour Member for Bunhill Ward



Defra
Single Use Carrier Bags
Resources and Waste Team
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Dear Madam/Sir,

Consultation on the proposal to extend the single-use carrier bag charge to all retailers and to increase the minimum charge to 10p.

I have pleasure in providing the response on behalf of Islington Council to DEFRA's consultation on the proposal to extend the single-use carrier bag charge to all retailers and to increase the minimum charge to 10p.

Islington Council considers the reduction of avoidable single use plastics to be a high priority for Local Authorities and government and generally welcomes the measures proposed in this consultation and the Resources and Waste Strategy, published in December 2018.

In particular, the proposals to extend Producer Responsibility to cover the costs of collection and disposal of the waste produced by packaging producers are welcomed as a way of incentivising greater sustainability in waste management and more responsibility on the part of producers, as well as easing the severe financial burden on Local Authorities who are charged with the collection and disposal of this material. We look forward to seeing further details on how this will be taken forward.

We also welcome the principle of using targeted charges and 'green taxes' to incentivise the reduction of certain waste types. This has clearly had a huge impact in reducing plastic bag

use both in England and in the many other countries where this has already been introduced. We were disappointed that the government chose not to apply a similar principle to disposable beverage cups. In our view, the application of a charge for disposable cups in addition to the standard charge for a cup of tea or coffee would have a similar impact on behaviour as the plastic bag charge, and we would urge the government to reverse their decision.

Our specific responses to the consultation questions are provided below.

Q1. What is your name?

Councillor Claudia Webbe

Q2. What is your email address?

claudia.webbe@islington.gov.uk

Q3. What is the name of your organisation?

Islington Council

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:

a) Public body

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

Yes. Evidence provided in the consultation indicating that 3.6 billion out of a total of 5.4 billion single use plastic bags distributed between April 2017 and March 2018 were distributed by small and medium sized enterprises. Our view is that this more than justifies the extension of the charge to this sector, in order to achieve a significant further reduction in plastic bag use.

The application of the charge to all plastic bags regardless of outlet sends a clear message to consumers and businesses about the environmental impact and the importance of the charge.

Research carried out by the North London Waste Authority indicates that a large majority of people use reusable bags, but not all of the time. This indicates a clear motivation to use reusable bags where practical or where there is a financial incentive to do so.

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?

We agree with the assumptions and the assessment of costs and benefits in the impact assessment on extending the charge to all retailers on the basis that we have seen nothing which counteracts this view.

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

Yes. The evidence provided in the consultation documents indicate that the increased charge will result in a further significant reduction in single use plastic bag use.

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.

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. The evidence from other countries including the Republic of Ireland which is outlined in the impact assessment accompanying the consultation provides a compelling case for the assessment of the likely impact of increasing the charge.

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. Placing the onus on SME's to carry out their own reporting would be onerous on these businesses and likely to be ineffective.

As detailed in paragraph 36 of the consultation document, in the absence of data reporting obligations placed on small businesses it is important to ensure the impact of the changes is fully assessed. We consider that a good way of ensuring that the data is as comprehensive as possible is to ask producers of plastic packaging to separately report the number of single use carrier bags they place on the market in England, Scotland and Wales as part of their reporting obligations under the Producer Responsibility Obligations (Packaging Waste) Regulations 2007 (as amended).

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. We agree with the government's assessment that there is no justification for retaining this exception. Passengers in transit are likely to be carrying bags already.

Furthermore, the environmental impact of a single-use plastic carrier bag is not determined by its source. There should be no distinction between the tax on a single use plastic carrier bag bought from a high street retailer or a retailer in the security restricted area of an airport.

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

Yes. We would prefer the implementation of these proposals to be as soon as practically possible. However, a first January date for the changes coming into force ties in with producer responsibility obligations reporting timetables. Giving retailers one year to prepare for the changes is also helpful.

In order to prepare small retailers in particular for the changes, the government should consider an extensive communication campaign to ensure that retailers are ready for the change. As noted in the impact assessment based on the experience in Wales, approximately 50% of complaints were about non-compliance by SMEs. It would be good to ensure as low a level of complaints 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?

Islington Council provides a commercial waste and recycling services to around a third of businesses in Islington. Whilst many businesses are keen recyclers, our experience demonstrates that despite the offer of a competitive first class service, the lack of compulsion on businesses to separate waste for recycling means that many do not.

Conversely, we have introduced 'time banding' on many main roads in Islington, requiring businesses to place with rubbish and recycling out at certain times for collection. This mandatory requirement has led to practically all businesses complying (regardless of their commercial waste service provider), leading to improvements in the cleanliness of the public highways, reduced levels of litter and so on.

Many businesses voluntarily want to 'do the right thing' but our experience shows that a mandatory approach galvanises those businesses who otherwise might not act.

Q14. Please provide any evidence that demonstrates large retailers' levels of compliance with the existing obligation to charge a minimum of 5p for single use carrier bags?

Our anecdotal experience in Islington shows virtually complete compliance with the existing charge among large retailers, with few if any small retailers voluntarily applying a charge.

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.

Clarity is requested regarding the application of the new charge to market stall holders and for online retailers. Our view is that the environmental impact of single use plastic bags is the same regardless of the source of the bag, and that there are viable alternatives for use in both circumstances, and that therefore the charge should apply.

In conclusion, we welcome these proposals and would urge the government to continue to take proactive measures to reduce waste and increase reuse and recycling wherever possible.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Claudia Webbe', written in a cursive style.

Councillor Claudia Webbe
Executive Member for Environment and Transport