



"Working for our members to be the voice of government on waste minimisation and recycling issues"

LOCAL AUTHORITY RECYCLING
ADVISORY COMMITTEE

Ian Troy
Department of the Environment
Environmental Policy Division
6th Floor
Goodwood House
44-58 May Street
Belfast BT1 4NN

12 October 2011

Dear Sir

CONSULTATION ON PROPOSALS FOR A CHARGE ON SINGLE USE CARRIER BAG USE

I am writing to present the LARAC response to the above Consultation, which is contained below, and I thank you for the opportunity to respond.

The responses below are sent on behalf of the Local Authority Recycling Advisory Committee (LARAC). LARAC is an association of around 380 local authorities across England, Scotland, Wales and Northern Ireland whose waste management and recycling professionals' co-ordinate and operate waste management services. Membership is drawn from all types of authority including statutory Waste Collection (WCA), Waste Disposal (WDA) and Unitary.

Our response has been peer reviewed by members of LARAC's policy team and executive committee. LARAC members have also been invited to comment on the consultation through the members' discussion forum on our website. All contributions received have been taken into account in drafting the response below.

Overall, LARAC members support the Department's proposals for a charge on single use carrier bags. Our comments are detailed below.

If you have any queries on this response then please contact me at larac@armagh.gov.uk or 028 37529624

Yours faithfully

Ms Liz Drew
LARAC Policy Team

Cc Mark McAdoo, LARAC NI Representative & Waste Manager, /Senior Technical Officer, Cookstown District Council



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CONSULTATION ON PROPOSALS FOR A CHARGE ON SINGLE USE CARRIER BAG USE

SUMMARY OF CONSULTATION QUESTIONS

1. What are your views on the Department's proposals in relation to which sellers should be subject to the charge?

LARAC members are supportive of schemes aimed at reducing packaging waste and of extended producer responsibility. We therefore welcome the provision of a clear message to consumers with regard to single use carrier bag usage.

As such, we would support a requirement on all sellers of goods, including companies, individual retailers and the not-for-profit sector to charge for single use carrier bags. In this way, no sector would be disadvantaged over another, and there would be consistency in messaging across all retail sectors.

LARAC would support application of a charge at both the place where goods are sold in order to allow the goods to be taken away, and in circumstances where carrier bags are needed to enable goods to be delivered.

However, we feel that full clarification will be required regarding the application of charges for bags used, for example:

- For internet sales or distance selling both within Northern Ireland and from outside the province
- When issued after the point of sale, i.e. when goods are collected at a later time
- When goods are used for promotional purposes

LARAC would welcome clear communication by the Department to both retailers and shoppers on the reasons for the levy, including reduction in litter and waste across the province. Members would suggest close monitoring of the impact of communication tools such as the Carrier Bag Charge Wales website (<http://www.carrierbagchargewales.gov.uk/>) following the introduction of the 5p levy on single use bags in Wales on 1 October 2011.

2. What do you think is an appropriate minimum charge for single use carrier bags - and why?

LARAC believes that any charge should be set sufficiently high to deliver an overall net benefit to society.



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GREEN GLASS

Based on the modelling detailed in the consultation document, members would therefore support a charge of between 8-10p as well as application of the levy to lower priced reusable bags supported by primary legislation, as in the Republic of Ireland.

Experience from the Republic of Ireland shows that whilst there was a dramatic fall in single use carrier bag use from the introduction of the 15 cent levy in 2002, by 2006 the number of plastic bags used had begun to increase again and the levy was subsequently increased to 22 cents¹.

LARAC feels that introduction of a levy across Northern Ireland should also be subject to on-going review.

3. Are there any types of carrier bags which should be exempt from the charge? If so, on what grounds?

LARAC recognises that paper bags and other alternatives can be as damaging to the environment as plastic bags, and as such we support the introduction of a charge on all single use carrier bags.

However, we also recognise that in certain circumstances there should be exemption from the charge, such as for example:

- Bags used for unpackaged or part-packaged foods such as meat or fish
- Bags used for loose goods intended for human or animal consumption such as fruit, vegetables, animal meal
- Bags designed for significant reuse such as zip-lock bags
- Replacement of reusable "Bags for Life"

4. Do you think that multiple use carrier bags should be included in any levy?

As stated in Question 2 above, members would support application of the levy on lower priced reusable bags, as in the Republic of Ireland.

5. What information should sellers have to keep in relation to the carrier bag charge?

In order to assess the impact of the charge, sellers should be required to keep, as a minimum, details of the numbers of single use carrier bags they issue. Given that the Department proposes that sellers will not be permitted to use any proceeds from the bag charge to set against costs of setting up and maintaining a charging system, we feel that any further administrative burden could be economically prohibitive on retailers, particularly in the current economic climate.

¹ source: <http://www.environ.ie/en/Environment/Waste/PlasticBags/>



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We do however feel that information regarding the amount of revenue generated, and the individual projects and programmes that this money will be used for, is vital in order to:

- Provide full transparency and openness to consumers
- Ensure a high level of public support and understanding of the scheme
- Maintain links between waste prevention and reduction resulting from the levy, and the environmental improvements that also occur as a result
- Ensure that the levy is not just seen by consumers as "another tax"

LARAC members do have concerns regarding the revenue generated from the levy being used solely to replace monies lost in budgetary cuts. As detailed on page 9 of the consultation document we feel the key objectives of the proposed charging policy should be the environmental benefits, rather than revenue generation. Ideally, we feel that the monies raised should be utilised on waste management projects.

For the reasons given above, we feel strongly that the Department should consider regularly publishing information on the waste management projects that the monies have been used to support.

6. Should sellers have to publish their records?

As for Question 5 above, LARAC members would welcome publication by the Department of revenue generated by the levy, alongside details of the general uses to which the proceeds have been directed.

7. Have you any views on which organisation should administer the carrier bag charging scheme in Northern Ireland?

As in Wales, it would seem appropriate that this function is taken on by local authorities' Trading Standards teams (or equivalent). However given that these, predominantly Environmental Health Departments, are also currently facing an increase in workload from other new/forthcoming legislation relating to, for example, fly-tipping, litter, graffiti and dog fouling, and severe budgetary constraints, we would have serious concerns regarding introduction of this new function without attendant human and financial resources including the creation of new roles.

In the light of this LARAC would suggest the Departments consideration of administration of the scheme via the tax regime, as in the Republic of Ireland.

8. Have you any views on the required arrangements to enforce the carrier bag charging scheme in Northern Ireland?



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In principle, LARAC would support the enforcement arrangements briefly outlined in the consultation document. However, we would have concerns regarding the potential burden on administrators if, for example, discretionary requirements are too complex.

LARAC members feel that prior to the introduction of the charge there must be intensive publicity of the levy, and the reasons for its introduction in order to ensure maximum awareness. We would welcome, for example, retailer packs that include detailed guidance, downloadable promotional materials to educate consumers and a communication toolkit, and as stated in question 1 above, close monitoring of the impact of the communications tools used in Wales.

9. Have you any comments on the Department's preliminary conclusions in relation to equality screening, human rights or rural proofing?

No.