



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

LOCAL AUTHORITY RECYCLING  
ADVISORY COMMITTEE

Consultation - Draft Guidance on the Single Use Carrier Bags Charge (Wales) Regulations 2010,  
Local Environmental Quality Branch,  
Department for Environment, Sustainability & Housing,  
Welsh Assembly Government,  
FREEPOST NAT 8910,  
Cathays Park,  
Cardiff.  
CF10 3BR

15<sup>th</sup> April 2011

Dear Sir/Madam,

**Consultation Response - Draft Guidance on the Single Use Carrier Bags Charge (Wales) Regulations 2010**

I am writing to present the LARAC response to the **Single Use Carrier Bag Charge** Consultation, which is attached, and I thank you for the opportunity to respond to the above consultation.

The comments below are sent on behalf of the Local Authority Recycling Advisory Committee (LARAC). LARAC is an association of over 400 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.

If you have any queries on this response or would like to discuss the matter further then please contact me on 01495 766745 or [roger.mills@torfaen.gov.uk](mailto:roger.mills@torfaen.gov.uk).

Yours faithfully,

Roger Mills  
LARAC Policy Team



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## SUMMARY OF CONSULTATION QUESTIONS

### General comment:

Whilst we feel that the guidance is very comprehensive, we feel that it may be overly complicated and long winded, and consider that a simplified version may be required for general consumption.

### PART ONE

#### Typos

Paragraph 50 - "The Regulations **to** not fix..." should read "The Regulations **do** not fix..."

Paragraph 71 - "the obligation to **engage**;" should read "the obligation to **charge**;"

Paragraph 73 - "is irrelevant to question" should read "is irrelevant to **the** question"

Paragraph 134 - "It is worth noting **that** the effect..." should read "It is worth noting the effect..."

Paragraph 148 - "at paragraph X below" should read "at paragraph **161** below"

Paragraph 209 - "be appropriate for **ever** seller" should read "be appropriate for **every** seller"

Paragraph 210 (b) - "ensuring that **that** their systems..." should read "ensuring that their systems"

### PART ONE

#### General Comments

Paragraph 79 - this will potentially lead to inconsistencies in the approach from different sellers, with some charging and some not, thereby creating confusion. We feel that the requirement to charge should be clear - either a seller is obligated or they are not.

Paragraph 117 - again this could lead to inconsistencies in the approach by sellers and could lead to confusion. If it is felt that it is counter-productive to enforce then why put it in the regulations in the first place?

### PART TWO

#### General Comments

The enforcement of the regulations will potentially place considerable burden on the administrator in human resources and administrative time. Will Local Authorities be given additional resources to enable them to sufficiently enforce the regulations?

Paragraph 42 - We would support the alternative mentioned in P42 rather than the option in P41.