

Single-Use Plastic Bag Charge for England – Defra Call for Evidence

To: Defra [plasticbagcharge@defra.gsi.gov.uk]

From: The Booksellers Association, 6 Bell Yard, London WC2A 2JR

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Response from The Booksellers Association of the UK & Ireland Ltd

Question 1: Are you answering these questions from the perspective of: - an industry group, business umbrella group or local business association

- 1 The Booksellers Association is a business umbrella group - a trade association that has 3,746 outlets in membership (as at 31st December 2013).

Question 2: In that capacity, do you dispense plastic bags or paper bags to the public?

- 2 Most booksellers source their bags from their own suppliers (and there are many in the marketplace). However, The Booksellers Association acts as a wholesaler for a number of our smaller members by selling them plastic and paper bags (and cotton *Bags for Life*), who then use them when selling books and other merchandise to the public.

Question 3: If you are an organisation outside of Government, what sort of organisation are you?

- 3 As a trade association, The Booksellers Association works for its members through the provision of goods and services, through representation, advocacy, networking and education, and through the promotion to consumers of bookshops and bookselling.
- 4 Our membership consists of:
 - Specialist Bookselling Chains (e.g. W H Smith, Waterstones, Blackwells)
 - Independents
 - School & library suppliers
 - Internet booksellers (but not Amazon)
 - Wholesalers
 - Specialist booksellers
 - Supermarkets (e.g. Tesco, Asda).

Question 4: How else should people be told about the charge, in order to make it more effective?

- 5 Many of our larger members have outlets not only in England, but also in Wales, Northern Ireland and Scotland. Having different arrangements in the various devolved regions will, we fear, inevitably lead to confusion, misunderstandings and unnecessary business costs. As a national retailer, having to devise and control different tracking and monitoring systems across your various outlets is exceedingly unattractive.
- 6 Our fear is that Consumers could well be confused, particularly if they live near the borders of two devolved regions with different arrangements.
- 7 Promoting details of the charge to English consumers is not going to be easy. It will presumably be necessary to get across why some shops are exempt, why some non-reusable bags are

outside the scheme, and why these exemptions are different to single use bag charge schemes in other devolved parts of the UK.

8 We would not be happy if the onus of explaining the 5p charge was placed on our booksellers. We believe that it is the Government's responsibility to explain to shoppers:

- Why the charge is being introduced
- That this is a DEFRA initiative and not a retailers' one
- The types of bags that are included in the scheme
- What consumers need to do if they want to avoid paying the 5p charge.

9 Booksellers would welcome being provided with a Marketing Tool Kit to promote the scheme and the ability to download appropriate POS from a dedicated DEFRA website.

Biodegradable bags

Question 7: Do you have any specific evidence on particular criteria for biodegradable bags that would decrease the negative impact of bags on the environment?

10 We believe the aim should be to get consumers in the future to adopt more bags that can be re-used. Exempting biodegradable bags from the 5p charge will not support the aim of Re-use and could well focus consumers' interest on using paper bags, which are two to three times more expensive than plastic bags. Retail operating costs would significantly increase if consumers migrated to paper and, according to the Environment Agency, carbon emissions would increase by a factor of 300 if this happened.

11 Biodegradable bags should be included in the charge.

What will happen to the money

Question 8: Should organisations have to publish annually:

- **number of plastic bags sold**
- **gross proceeds from the charge**
- **costs of administering the charge**
- **net proceeds from the charge**
- **how the net proceeds have been spent**
- **number of free biodegradable bags distributed**
- **number of *Bags for Life* sold?**

12. We very much hope that small bookshops can be exempt from having to report on all the above factors. A threshold of 250 employees would seem to be sensible and that those below should be exempted from reporting.

13 We understand why there is a proposal that the retailer should report on the number of plastic bags sold, but we do not think there should be a requirement for booksellers and others to have to report on the number of *Bags for Life* sold.

- 14 Passing any monies collected from the charge to charities and good causes is welcomed. The development of a Voluntary Agreement would be beneficial, setting out for booksellers the principles of how the money collected might be used.

Wider evidence on bag usage and costs

Question 13: Please provide any estimates you are aware of at the sectoral or national level, as available, of:

- the total number of single-use plastic bags, bags for life and bin liners (broken down by type – pedal, swing, refuse bags, etc.) currently used in England, preferably broken down by type of retailer where they originate (i.e. supermarkets, large high street chain stores and SMEs);
- where the bags (all types mentioned) used in England are produced (UK or overseas);
- current bag usage patterns by type of retailer (number of items per bag and bags per £1 spent) for each kind of bag;
- current levels of re-use of Bags for Life and single use-plastic bags (e.g. as bin liners);
- current costs to retailers and consumer prices of single use plastic bags, Bags for Life and bin liners (broken down by type – pedal bin bags, swing bin bags, refuse bags etc);
- the environmental costs of bin liners, Bags for Life and single-use plastic bags in terms of life-cycle carbon impact;
- the costs of clearing up littered single use plastic bags in urban areas, by roadsides and along coastlines;
- the waste treatment costs for single-use plastic bags.

- 15 We would refer to:

- The 2011 Environment Agency Report on carrier bag life cycle assessments:
<http://a0768b4a8a31e106d8b0-50dc802554eb38a24458b98ff72d550b.r19.cf3.rackcdn.com/scho0711buan-e-e.pdf>
- Data collated by WRAP on carrier bag usage: <http://www.wrap.org.uk/content/carrier-bags-reducing-their-environmental-impact>.

Question 15: Do you have evidence or case studies that provide information on the proposed exemptions to the charge?

- 16 We take the view that the proposed charge of 5p for England should be applied to all single use carrier bags, to avoid retailers instead offering paper bags – which are more damaging to the environment. As we have indicated in 7.2 above, biodegradable bags should be included in the charge.
- 17 Importantly, our Council feels strongly that any carrier bag charge should apply to all retailers, regardless of size. Otherwise smaller businesses may be disadvantaged.