



Consultation: Carrier Bag Levy – Price Threshold

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The Consumer Council welcomes the opportunity to respond to this consultation. The Consumer Council previously responded to the Department of the Environment (the Department) July 2011 consultation on proposals for a charge on single use carrier bags and the subsequent consultation document on the Draft Single Use Carrier Bags Charge Regulations (Northern Ireland) 2012. The Consumer Council's responses explained it would accept the introduction of a charge on single use carrier bags if the charge was minimal and the proceeds were used to fund environmental initiatives rather than the levy being used as a Government revenue raising instrument.

The current consultation document outlines the Department's intention to increase the levy on single use carrier bags to 10 pence. The paper also proposes that any reusable bag sold for less than 40 pence will also be subject to the levy.

The Consumer Council accepted the initial 5 pence levy on the basis that it would provide a moderate cost disincentive to discourage the use of single use carrier bags. However in response to the Department's previous consultations the Consumer Council objected to increasing the levy to 10 pence. The Consumer Council opposes the planned increase on the basis the higher levy marks a departure from a moderate cost disincentive and the adoption of a punitive charge intended to penalise the users of single use carrier bags. Consumer Council consumer research indicates a minimal charge would be sufficient to discourage use of single use carrier bags¹.

The current consultation paper explains the Department's proposal to extend the levy to lower cost reusable bags to prevent consumers from treating them as 'throw-away bags' and using them only once. The Consumer Council re-states its objection to the Phase Two extension of the levy to lower cost reusable bags. The Consumer Council recognises that the sale of reusable bags at the same price to the consumer as the levy on single use bags may serve to undermine the overall reduction in the amount of bags used and discarded. However, the imposition of the proposed 40p threshold is excessively high and this disproportionate response to the issue will unduly impact consumers.

Although the consultation paper explains that the Minister has identified 40 pence as the preferred option for the price threshold, the document does not outline the evidence used to determine 40 pence as the most appropriate threshold. The Consumer Council requests that information is provided concerning the evidence base used and the number of consumers engaged in

¹ The Consumer Council conducted a series of focus groups during August 2011 at which consumers were asked to express their opinions regarding the potential introduction of a levy on single use carrier bags.

the Department's process for determining the level of the threshold. If the Department has not actively engaged with consumers, no further steps to introduce a price threshold for reusable carrier bags should be taken until a thorough process of consumer engagement has been conducted to fully examine views on whether or not a threshold should be introduced.

If environmental gains are to result from the introduction of a levy on carrier bags in Northern Ireland it is important there is strong encouragement of the use of the most environmentally benign reusable bags. Research² indicates that using a low-density polyethylene bag (typically the least expensive type of reusable bag) four times has a lower climate change impact than using four separate single-use high density polyethylene carrier bags.

Conversely, a reusable cotton bag needs to be used 131 times before it is less damaging in terms of its contribution to climate change than using conventional carrier bags the same number of times on a single use basis. If the Department is to succeed in minimising the climate change impact of carrier bag use it should encourage the use of reusable bags with the lowest impact in terms of climate change rather than introducing a punitive levy for this type of lower cost reusable bag.

In conclusion, the Consumer Council believes that the proposed 40 pence threshold for low cost reusable bags is excessively high and would result in unnecessary costs for consumers. No evidence has been provided by the Department concerning whether or not the imposition of a threshold would incentivise the use of the most environmentally benign reusable bags. Additionally, the Department has not demonstrated if it has undertaken a process to actively engage with consumers to discuss whether a price threshold for reusable carrier bags would be an effective mechanism to promote their use in place of single use bags. The Consumer Council therefore believes no further work should be undertaken to introduce a price threshold for reusable carrier bags until both these issues have been addressed.

If you wish to discuss any of the points raised in this response please do not hesitate to contact Andy McClenaghan on 028 9067 4808 or amcclenaghan@consumercouncil.org.uk.

² Environment Agency (2011) Life Cycle Assessment of Supermarket Carrier Bags and AEA Technology (2005) Proposed Plastic Bag Levy - Extended Impact Assessment: Volume 1: Main Report. Scottish Executive: Edinburgh
<http://www.scotland.gov.uk/Publications/2005/08/1993154/32048>



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Making the consumer voice heard and making it count

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