

Environmental Levy on Plastic Bags (Scotland) Bill



**Friends of
the Earth
Scotland**

Supplementary evidence from Friends of the Earth Scotland

31 August 2006

1. Introduction

Friends of the Earth Scotland is an independent member of the Friends of the Earth International network. We undertake research, advocacy and community development activities throughout Scotland in pursuit of environmental justice and sustainability. This paper represents the views of Friends of the Earth Scotland.

This supplementary evidence is submitted in support of evidence already submitted by Mike Pringle MSP.

2. Summary of main points

- There will be a net and quantifiable environmental benefit from the proposed levy.
- The environmental benefits of the bill have been understated by some previous reports.
- Experience from Ireland strongly suggests that the overall environmental impact of the Bill will be positive.
- Claims that paper bags have a greater environmental impact than plastic bags are not supported by the evidence.

3. Specific comments

3.3. Environment and Rural Affairs Committee Stage 1 report

The Committee raised several points in its Stage 1 report on the bill and highlighted a number of areas where additional evidence was sought.

The evidence submitted in response by Mike Pringle MSP has directly tackled these points raised – the one area in which we wish to submit further evidence is in response to the questions raised as regards the overall environmental impact of the bill.

3.4. Overall Environmental Impact of the Bill

The Extended Impact Assessment Report, produced by AEA Technology for the Scottish Executive, assessed the likely impact of the bill in several key areas including environmental

Friends of the Earth Scotland

Lamb's House, Burgess Street, Edinburgh, EH6 6RD

Tel 0131 554 9977 Fax 0131 554 8656 Email info@foe-scotland.org.uk Website www.foe-scotland.org.uk

A Scottish Charity: SC003442

impact. In its conclusions, the report noted several areas of potential concern, and in its concluding statement noted that;

“The environmental benefits ... from a levy are modest when compared to overall environmental impacts from other activities in Scotland.”ⁱ

However a closer look at the research undertaken by AEA Technology cast doubts on the presumptions it makes regarding environmental impact, in particular the likely effects of substitution of paper bags.

Friends of the Earth Scotland also believes this analysis fails to give sufficient weight to wider environmental benefits in terms of changes of behaviour such as the greater re-use of bags and the challenge this poses to Scotland’s throw-away culture.

3.5. Impact of Plastic Bags

Firstly it should be emphasised that the AEA report does conclude that it predicts that if the levy were to be introduced, energy production would fall as a resultⁱⁱ. This would be a net benefit as the bags are not only made from fossil fuels but also made using fossil fuels.

In a major study assessing the impact of the Irish experience, virtually all respondents indicated that the impact on the environment was positive, noting a significant reduction in plastic bags in the environment.ⁱⁱⁱ

Because of their essentially inert nature plastic bags do not biodegrade in landfill^{iv}. This is combined with the problem that plastic bags often end up as litter in areas where clean-up and disposal is difficult, and where they are responsible for disproportionate environmental impact; for example on beaches, riverbanks and the sea.

Meanwhile, claims that plastic bags have a lower environmental impact than their paper counterparts is questionable. One of the most comprehensive studies, using life-cycle analysis to compare paper and LDPE plastic bags, by a Dutch consultancy concluded:

“The paper bag shows a slightly greater environmental impact than the plastic bag. However, the difference is so small that given the uncertainties no hard conclusion is possible.”^v

3.6. Substitution of paper bags

The issue of paper vs. plastic only becomes significant if significant substitution of paper bags in place of plastic is likely to occur, something suggested in the AEA technology report. However there is evidence that contradicts this assessment, especially from Ireland – one of the few countries to have actually introduced a levy.

Anecdotal evidence from Ireland shows that predictions of high substitution rates are not borne out in consumer behaviour, with limited degrees of substitution reported.

In the months preceding the introduction of the levy, retail outlets reported a significant change in consumer behaviour regarding plastic bags, with Tesco Ireland’s Environmental Manager, Jim Dwyer, commenting;

“We have seen a marked change in consumer behaviour in anticipation of the new levy, reflected in the significant increase in sales of our reusable bags.”^{vi}

This is verified by the UK Bag Manufacturers who in response to the bill point to several questionable presumptions used in the AEA report, most notably:

“The extended impact assessment fails to compare like with like, comparing a thin plastic sleeve bag with a premium quality handled bag, despite the fact that there is no possibility of such a substitution taking place.”^{vii}

4. Conclusion

There will be a net and quantifiable environmental benefit from the levy, based on the Irish experience across the life cycle of the bags, due to less energy in production and less waste that either ends up in landfill or as litter.

The experience from Ireland suggests that bags will be re-used more often; fewer surplus bags will be acquired or more durable alternatives designed for long-term reuse will be adopted. There is limited evidence to suggest that the principle outcome of the levy will be to encourage consumers to switch from one form of disposable (non-biodegradable) plastic bag simply to another disposable product in the form of bags, albeit one that is biodegradable. Whilst substitution is likely to take place, this is likely to be small in scale and certainly not an excuse for failing to harness the benefits stemming from a net reduction in the production and disposal of plastic bags.

It should be remembered that the ultimate intention of the levy is to change the behaviour and consumption patterns of both retailers and consumers. Therefore the benefits go much further than the simple reduction in plastic bag usage by raising an awareness of a pressing environmental issue, namely the ongoing increase in the waste produced in Scotland. Any proposal that can affect consumer behaviour on a daily basis, reinforcing the waste hierarchy of prevention, reduction and reuse can in no way be termed modest.

We trust that you are able to take these comments into account during further consideration of the Bill.

For further information please contact:

Eilidh Macpherson
Parliamentary Assistant
Friends of the Earth Scotland
parliassistant(at)foe-scotland.org.uk

ⁱ AEA Technology on behalf of the Scottish Executive, July 2005, Proposed Plastic Bag Levy – Extended Impact Assessment Report., p.8

ⁱⁱ AEA Technology on behalf of the Scottish Executive, *ibid*.

ⁱⁱⁱ Convery F and McDonnell S, ‘Applying Environmental Product Taxes and Levies – Lessons from the Experience with the Irish Plastic Bag Tax’ (2003), Environmental Studies Research Series, Working Paper, University College Dublin, p.10

^{iv} Fehily Timoney & Company, with Aspinwall & Company, Consultancy Study on Plastic Bags, (1999), Department of the Environment and Local Government, Dublin

^v Pre Consultants (1996). Eco Indicators 95-A Manual for Designers - <<http://www.pre.nl/eco-indicator95/eco-indicator95.htm>>

^{vi} Reported in Breakingnews.ie, 2 March 2002 - <<http://archives.tcm.ie/breakingnews/2002/03/02/story41711.asp>>

^{vii} UK Bag Manufacturer’s Association, Written submission to Environment & Rural Development Committee (2005) - <http://www.scottish.parliament.uk/business/committees/environment/inquiries/pb/UK_BMA.pdf>