



**UK CARRIER BAG CONSORTIUM RESPONSE
TO CONSULTATION DOCUMENT -
AN ENVIRONMENTAL LEVY BILL
“CARRIER BAG TAX FOR SCOTLAND”**

May 2004

Our grateful thanks go to the following Scottish businesses who have given freely of their time, energy, support and evidence towards compiling this response:

**SIMPAC, Glasgow
MacKinnon and Hay Ltd, Penicuik
Travelstock (Packaging) Ltd, Aberdeen
TJ Wright (Packaging) Ltd
George E Morris and Co
CJ Robertson (Packaging) Ltd
Glasgow Packaging and Print Ltd
Marshall Wilson Packaging
Peter Bryson Ltd
Euro Packaging plc
BPI plc
East of Scotland Contracts Ltd**

and all of the member companies of the CBC in England, Wales and Ireland

A FUNDAMENTAL ISSUE

The “Environmental Levy Bill – Consultation Document” produced and distributed by Mike Pringle, MSP fails to apply or comply with the most fundamental principle of public consultation in that it allows no consideration or debate on whether the proposal will work. It merely seeks opinion on how it might be implemented.

Thus, throughout the consultation document, a basic (and incorrect) assumption is made – that a tax or levy on plastic carrier bags **would** benefit the environment.

This assumption renders the consultation document invalid in the democratic process because it serves to pre-condition public response to the validity of an environmental tax *per se*.

The real purpose of public consultation, both as an integral part of the process of democracy and as a means towards promoting new legislation, should be to lay before the public the entirety of pertinent fact as it relates both to the proposition and its effects.

This consultation document not only fails to meet such essential criteria, it repeats ill-informed popular myth and misinformation through wholly unsubstantiated conjecture.

In contrast, the thirty eight independent sources of reference appended at the end of this response comprise a solid body of published work on the complex issues surrounding popular calls for a plastic bag tax.

Subject to the above caveat of principle, and in order to have the views of science and industry heard, we offer below our formal response and trust that this will lead to the immediate withdrawal of proposals for the “Environmental Levy Bill” in the Scottish Parliament.

Foreword (Page 1)

“Many of these plastic bags are not reused and eventually find their way into landfill sites or end up as litter on our streets.”

This statement is untrue. The vast majority of carrier bags are, by definition, used to convey goods from the shop to the home and it is wrong to suggest they are deliberately littered. Research commissioned by the UK Environment Department (DEFRA) and WRAP proves conclusively that 80% of all householders reuse their plastic carrier bag at least once for applications varying from bin liners to the safe and hygienic containment of dog droppings.

This level of reuse, an essential part of the hierarchy of good environmental practice, is greater than reuse levels for any other consumer “disposable product”. Even after such high levels of re-use, Analyses of Household Waste Composition by DEFRA and WRAP together with numerous litter surveys indicate that plastic carrier bags comprise far less than 1% of litter on our streets or landfill.

This is mirrored by the HM Treasury Plastic Bag Tax Assessment which states UK use of plastic carrier bags “translates to about 0.3% of the municipal waste stream.”

“If the aim were to tackle the litter problem, it would be misguided, as it would fail to address the fundamental cause of litter – people’s behaviour. The solution to litter has to be a comprehensive approach aimed at changing attitudes and behaviour. Such an approach would address all litter through a combination of public education, enforcement of the litter laws and local authority cleansing programmes. Any other approach would at best be piecemeal and at worst condone anti-social behaviour.”

Industry Council for Packaging in the Environment, Position Paper on Possible UK Plastic Carrier Bag Tax. May 2002

“This (tax) will be good for the environment and good for business”.

This statement cannot be substantiated. There is no more environmentally-friendly option (including paper and so-called degradable bags) than the conventional plastic carrier bag. A carrier bag tax will effectively drive people to more environmentally-damaging alternatives and will close or seriously endanger the future of packaging businesses across Scotland and the UK.

Less than 1% of our household waste stream comprises plastic bags. It is surprising, therefore, that this proposal makes no mention of taxing key waste components such as paper and cardboard (18%); metal (8%) and glass (7%) all of which consume greater energy and resources, create atmospheric pollution and occupy greater volume.

“The funds raised will go to the local authority.....”

The proposed tax level of 2000% is higher than for any other tax in the world, but it would not raise any significant funds. Such a tax is fundamentally self-defeating. Experience in the Republic of Ireland indicates that the usage of plastic carrier bags has declined by in excess of 90% - but the residual funds (est. 10 million Euros) generated by the remaining 10% of those prepared to pay for carrier bags is estimated to be far less than the cost borne by the authorities in administering the scheme and is certainly less than the increased cost of theft to retailers as stated by RGDATA (Irish Grocers' Association) and in other published reports.

Contents Page (Page 3)

We should draw attention to the fact that the contents page is dominated by an emotive image of waste along the shore or bank of an unnamed expanse of water. This is a deliberate, cynical and emotive attempt to relate water-borne debris to plastic shopping bags in the mind of the reader.

Closer examination and enhancement of the picture shows the vast majority of the debris comprises green, blue, white and black refuse sacks of a size and nature which could only have come from the accidental or deliberate dumping of waste bound for landfill or another destination. A tax on shopping bags would not have averted this problem.

Introduction Section (Page 4)

Para 3: *“Many people will often take a few extra just in case.”*

We dispute this statement. We can find no evidence of the widespread taking of unnecessary carrier bags. Our industry has worked closely with retailers for many years and we encourage responsible retailers to ask customers if they require a carrier bag.

In the Republic of Ireland, where customers have been driven to use paper bags, it is now common for double or triple-bagging to take place to overcome the inferior strength of paper compared with plastic. This means, for example, that if the original figure of 1 billion plastic carrier bags used in Scotland is accurate, an equivalent of possibly 2 billion paper bags may be required in substitution. This would lead to the need to ship, transport and store 20 times the volume of bags with a consequent massive detrimental effect on our environment.

Para 4: *“I feel that legislation is necessary to promote the reuse of plastic bags and to focus the public and retailers on reducing waste and promoting reuse and alternatives.”*

The plastic carrier bag already boasts the highest reuse factor of any disposable consumer product. It is difficult to understand the logic of how the virtual removal of plastic carrier bags will promote their greater reuse.

There are also serious health and safety issues related to encouraging the reuse of plastic carrier bags as carrier bags (rather than waste bags) etc. During their original use, plastic carrier bags may become contaminated with, for example, household chemicals, fish or meat residues/odours, etc. In these circumstances, their reuse as a shopping bag could represent a hazard to consumers and their health.

“Bags for Life” are heavier, bulkier, more expensive and would need high levels of re-use to achieve the minimal environmental impacts of the current HDPE bags. These bags have not proved popular due to their inflexibility for the impulse shopper.

So called “degradable” alternatives have far higher environmental impacts and risks with entry into landfill directly contravening the obligations placed on local authorities to reduce degradable materials being disposed of in this way.

Para 5: ***“Windborne, lightweight plastic packaging (including plastic bags) is closely associated in the public mind with the issue of litter... bags stuck in trees and bushes... pose a danger for wildlife.”***

A “close association in the public mind” is an issue of perception rather than reality. In this context we have logged and noted the use of sensationalist news reports to promote support for a bag tax. As we have consistently stated, the facts will show that less than 1% of litter or landfill comprises plastic shopping bags. Therefore their contribution to litter is statistically insignificant regardless of how the public may perceive this matter.

The largest elements of litter on streets comprise fast food packaging, drinks bottles and cans, cigarette-associated litter and chewing gum. A plastic bag tax would not solve the problem of litter nor have any effect on changing the habit of littering amongst the public. Similarly the continual emotive claims that plastic shopping bags are a danger to wildlife is both cynical and largely anecdotal and is designed to play on public emotions. The major global dangers to wildlife such as road traffic and vehicle pollution are cynically ignored by those who call for a plastic bag tax. Creatures which are able to ingest small particles of plastics (from whatever source) should suffer no ill effects from this chemically-inert material. Because plastic does not harm living organisms, the vast bulk of surgical implements and medical devices such as catheter tubing, heart valves, blood bags etc are manufactured from it.

Page 2: Background

Para 7: ***“Such bags are non-biodegradable.”***

This comment demonstrates a lack of understanding of the role and process of degradation and its overall environmental impacts. The fact that certain plastic packaging materials (including plastic carrier bags) do not degrade in the short-term, is a positive and distinct advantage rather than a negative. A plastic bag tax would increase the amount of degradables going to landfill because it would encourage paper bags and so-called degradable plastic bags. The act of degradation in landfill produces greenhouse gases both carbon dioxide and methane (30 times higher toxicity than CO₂) both of which are a most significant contributor to ozone layer damage and therefore, our largest single global environmental problem. A carrier bag tax holds a real risk of adding to this problem. The EU Landfill Directive places greater responsibilities on local authorities to reduce the amount of degradable materials going to landfill.

Degradable bags will encourage the “throwaway culture” not discourage it. They also present a serious risk through contamination of existing plastics recycling (300,000 tonnes per annum).

Para 8: ***“The retail sector... makes them available... for the use and convenience of its customers.”***

We agree that the plastic carrier bag is by far the most convenient choice for consumers. It is also the best environmental choice for the reasons outlined in our supporting appendices to this response. Scottish retailers should also be made aware that, if a plastic bag tax is introduced, they lose one of the most effective methods of reducing theft. Because a carrier bag is normally only offered and used during or after payment has been received, it provides the most effective visual evidence of payment for goods. In the Republic of Ireland, where customers were driven to bring their own shopping bags into stores, this has made the theft of goods from the shelf far easier as well as costing every small grocery shop in Ireland an average of 5,400 Euros per annum in stolen and/or abandoned wire baskets and trolleys. These metal containers have far greater environmental impacts during production, shipment, eventual disposal, etc. and are a far greater visual problem when abandoned into the local environment than plastic bags.

Para 10: ***“The average household is estimated to have 40 plastic bags stuffed in cupboards... the majority of this would be single use ... this (80% re-use) figure is aspirational.”***

This statement not only misleads, it ignores the facts published by independent studies including those by DEFRA. Is it being suggested that independently commissioned and professionally managed Government research is “aspirational”?

The fact is that plastic carrier bags are reused more than any consumer disposable product. For applications such as school lunches, sports kit, etc such carrier bags may be reused many times adding considerably to their value in reducing the need for alternatives. In the Republic of Ireland, our members (who also produce and supply bin liners and refuse sacks) have reported increased demand for such alternative bags of between 250 and 500%. Our research shows that since the bag tax was introduced in Ireland, there has been little significant reduction (if at all) in the tonnage of plastic bags of all types used in that country. There is also clear evidence in Ireland of a switch to paper bag substitutes which consume eight times the raw material, three times the energy, create twice the levels of air pollution, waste fifty times as much process water, have six times the weight and ten times the volume. Paper carrier bags do not work in the rain and are seldom re-used (if at all) or recycled. There is no question that on the basis of paper substitution alone, a plastic bag tax has a devastating negative effect on the environment.

Para 11: “Discarded...directly into the environment.”

These statements relating to the proportion of plastic shopping bags littered into the local environment are not only designed to mislead but are conveniently not quantified. As we have stated, plastic shopping bags make up far less than 1% of litter on our streets and in our landfill. This is predictable because the vast bulk of customers use their carrier bag for getting shopping from the checkout to their kitchens. Therefore, at the point that carrier bag has fulfilled its primary use, it is most unlikely to be littered into the street. This supports the DEFRA statistic that 80% of plastic carrier bags are reused in the home.

Para 12: “They are a source of considerable nuisance. We have all seen bags stuck in trees, in bushes and along river banks.”

Whilst the public may translate “plastic in trees” into “plastic bags in trees” the incidents of plastic shopping bags being littered in this way is very, very small. The attributes of a plastic film – lightweight, low volume, high strength – also contribute to its high visibility when blown by the wind. Much of the littered plastic seen in hedgerows and trees in our rural environments is film for agricultural use including fertiliser and animal feed bags, crop protection films, silage wrapping film.

Para 12: “Plastic bags are also the second most common pollutant washed up on beaches.”

Since this consultation document, the Marine Conservation Society survey of beach litter shows that all plastic bags (not just shopping bags) comprise 2.5% of litter compared with fishing debris 14.6%, sewage-related debris 7.8% and shipping litter 2%. This proposal conveniently refers to “plastic bags” rather than plastic shopping bags. Beach litter is the result of either the illegal and irresponsible dumping of waste at sea or by tourists. This problem should be tackled using punitive measures supported by international law. Waste carried on ocean tides cannot be reduced through a levy imposed on one type of bag by one local authority in one country alone.

Para 13: *“...waste should be diverted away from landfill and this measure will help...any reduction is welcome.”*

Plastic shopping bags represent far less than 1% of landfill. A shopping bag tax would not help divert waste from landfill nor solve the overall landfill problem. In fact, it would work in entirely the opposite way by encouraging further bulky, heavier materials such as paper bags and carriers going to landfill with the additional risk of decomposition. All this would be in direct contravention of the EU Landfill Directive and would lead to the risk of significant increases in landfill volume and ozone-damaging emissions in Scotland.

Para 13: *“This measure will encourage the use of more easily recyclable materials for carrier bags.”*

This statement seriously misleads the Scottish public because it implies that plastic carrier bags are not easily recyclable and that our industry does not engage in major recycling effort. It also suggests incorrectly that so-called recyclable materials such as paper shopping bags are actually recycled by the public on a large scale.

Our industry already recycles 300,000 tonnes of plastic films each year. This is more than twice the entire UK usage of plastic carriers. The centre of this crucial recycling effort is based in Scotland and its economic viability is dependent on the success and profitability of our wider industry. A plastic bag tax could jeopardise this important and environmentally positive activity with no environmental gain.

Para 14: *“Windborne plastic bags originating from landfill sites are also a major cause of litter.”*

This statement, once again, conveniently relates to all plastic bags rather than plastic carrier bags. The reality is that most plastic bags in landfill are local authority encouraged refuse sacks which make a significant major contribution to the safe, healthy and efficient disposal of waste. Without the containment offered by plastic refuse sacks, bin liners and carrier bags, our society would risk greater public health hazards. Wind blown plastic bags of all types from landfill sites are an issue to be addressed by improved landfill site management. A plastic bag tax on the consumer would make no difference to this problem.

Para 14: *“Consumers have been encouraged under these schemes to use a variety of alternative containers at point of sale.”*

Our industry was the originator of the “Bag-for-Life” concept. We have also encouraged recycling bins in supermarkets etc. There’re a number of reasons why the public has been slow to take up these schemes not least because they are inconvenient and do not allow the number of bags used to be adjusted precisely to the nature of the shopping trip. We would certainly not advocate, as suggested by this consultation document, plastic boxes which have far greater environmental impacts in production, use (weight of transportation etc) and disposal than the thin plastic carrier bag. This proposal also clearly aims to legislate against the disadvantaged in our society, including a large and important sector of Scotland’s shoppers such as the elderly, infirm, low income groups and those without motor vehicles at their disposal all of whom would have great difficulty in coping with less convenient shopping carriers suggested in the proposal.

Businesses including smaller retailers, corner shops, convenience stores, fish and chip shops, etc would also suffer unfairly from such a tax.

Para 16: *“....stopped people from taking carrier bags just in case...”*

This consultation document pre-supposes that consumers take extra bags just for the sake of it. If it is true (and no evidence has been given) that shoppers take extra carrier bags than they need to carry purchases, it is likely to be because the bags provide essential re-use in the home as stated in Government research. We do not believe that the vast majority of the public knowingly and deliberately create waste in this way.

Para 17: *“Sainsbury’s...offers 1p for each plastic bag reused...experience is that the use of this (facility) is marginal.”*

The low take up on the 1p credit for each carrier bag reused is far from surprising given the fact that 80% of carrier bags are already being used for other purposes around the home. This level of re-use achievement totally mitigates the recycling issue (paper bags are rarely recycled in any case) and is far higher than targets set by the EU for the year 2015. Apart from the plastic carrier bag’s outstanding functionality and flexibility around the home, no other “disposable” product (drinking cups, ball pens etc.) achieves such high levels of re-use

Para 18: *“Bag for Life...schemes still has a marginal impact on plastic bag use.”*

Once again, this is because the lightweight giveaway plastic carrier is not only more convenient (number of bags used is adjusted by the shopper at the checkout to cope with the amount of shopping purchased) but also because such bags have a crucial second or more use when in the home – a factor ignored in calls for a bag tax.

Para 19: *“Recycling of post-use and specifically post-consumer plastic presents difficulties.”*

As we have stated, through our own initiatives our industry already recycles 300,000 tonnes of plastic film each year, much of this activity centred on Scotland. This is the equivalent of twice the number of plastic carrier bags used across the UK. A plastic bag tax could jeopardise the future of our industry and with it this vast recycling effort. It is also important to state that many carrier bags already use high recycled content and this is never taken into account when proposing plastic bag taxes. Many plastic films are recycled into other long-life applications like community street furniture such as weatherproof benches and litter bins etc.

Para 20: *“Collection points for old plastic bags... uptake has been slow...people’s attitude to plastic bags is still as a throwaway product.”*

The carrier bag is not a throwaway product for most people. It is a convenient, high re-use container. Our industry has played a major part in encouraging retailers to consider carrier bag recycling bins and these are increasingly being installed. We have strong relationships with all of the major retailers and already collect back of store plastic films such as those used for collation wrapping, pallet wrapping etc. It is simply not true to state that people see the plastic carrier bag as a “throwaway” item – if this was so why do 80% of households use them time and again before eventual disposal?

Para 21: *“...local authorities now collect plastic from homes...but the current market for this in Scotland is small.”*

This statement conveniently ignores the fact that the vast bulk of plastic carrier bags collected from homes by local authorities contains odorous, putrescible waste. Without plastic carrier bags, as we have stated, they will either be a major increase in the use of plastic bin liners and refuse sacks or, conversely, a serious retrograde step in public health and the safety and well-being of the community and its waste collection operatives.

It is also untrue to suggest that the market for recovered plastics is small. The BPI plc plant at Dumfries has major recycling capacity and BP Chemicals at Grangemouth is developing innovative feedstock recycling plants which, when commercialised, will require substantial tonnages.

Para 22: *“Incineration is a form of recycling ...pollutants in plastic ...”*

It is untrue to suggest that the recovery of latent calorific value in plastics through this method creates or releases dangerous or polluting substances to the atmosphere. Incineration for the recovery of energy and for district heating schemes is an established and entirely safe international practice strictly regulated by law. All modern incinerators utilise the most advanced gas scrubbing technologies before releasing harmless vapour to the atmosphere. This is recognised, for example, by the public of Sweden, one of Europe’s most advanced and environmentally-aware nations, where energy from waste plants are used by many local authorities to considerable economic and ecological advantage.

This is confirmed in a Review researched and written for DEFRA by Enviro, Birmingham University et al in May 2004 in which Environment Minister, Eliot Morley MP says, “We must acknowledge the role of incineration with energy recovery as a sustainable waste management option.....”

Waste incineration accounts for less than 1% of dioxins whilst domestic sources such as cooking and burning coal etc account for 18% of UK emissions. Incineration produces less than 1% of emissions of oxides of nitrogen whilst road traffic produces 42%!

Para 23: *“We want now to legislate to encourage reuse of bags.”*

A tax on plastic carrier bags would not encourage the reuse of bags. Instead it would deprive people of their best re-use option forcing them to pay for alternatives. In the Republic of Ireland, people have been driven to use paper which can be proved to be environmentally less friendly than plastic for the reasons we have stated. Additionally, there has been a high level of theft from the shelf as well as theft of wire baskets and trolleys – all of which have environmental impacts as well as economic effects for retailers (and ultimately the price the consumers pays).

Para 26: *“Recyclable bags made from tapioca... stopped the trials as take up had been poor.”*

This is not surprising since Sainsbury’s now accept the fact that degradable bags (including paper and any other so-called biodegradable materials) are neither popular nor economic. As we have stated, they also involve the non sustainable use of resources and are far more likely than conventional plastic to assist the production of damaging greenhouse gases – our single greatest global environmental problem. Plastic bag taxes will encourage the belief that degradability is always better for the environment – when, in fact, the opposite will often be the case.

Para 27: *“The purpose of the legislation being environmental: to reduce the number of windblown, discarded bags littering the countryside ... by changing people’s throwaway attitude ... encouraging their reuse...”*

Whilst the Irish bag tax is often cited as successful – it has not been successful for the environment. It has reduced plastic carrier bag usage in an excess of 90% but it has also brought serious environmental impacts including switching to heavier, bulkier alternatives which will degrade or decompose to produce greenhouse gases. It has also encouraged theft. There is no evidence offered (unsurprisingly given the fact that plastic carrier bags are less than 1% of litter) that litter has reduced in the Republic of Ireland since the introduction of a plastic bag tax.

Para 28: *“Money from the scheme is earmarked for environmental improvements.”*

Any “environmental improvements” paid for by the Irish Bag Tax fund would be far outweighed by the negative and largely unseen environmental impacts of the tax for the reasons given throughout this document.

If, as has been stated, 8 - 10million Euros has been generated by a plastic bag tax in the Republic of Ireland, this equates to about one third of our estimates of the cost to retailers alone in buying replacement paper bags (four times the cost of plastic) shipping and storing paper bags (six times the weight, ten times the volume) increased theft from the shelf and of wire baskets and trolleys etc.

Most importantly, this tax proposal does not take into account the administrative costs borne by the authorities (both local and national) in order to police the scheme and which will be paid for by the public. The Irish bag tax has not generated any significant funds for the environmental good and we have seen no evidence of any kind of any schemes which have been funded by the plastic bag levy since it was introduced in April 2002 – some two years ago.

The much more substantial funding generated from the Landfill Tax has already supported many excellent environmental projects and served key aims of preventing / reducing waste sent to landfill. The Landfill Tax is administratively far more practical and equitable as it applies to all forms of municipal waste regardless of material type.

Para 29: *“In Australia... the decision to impose the levy was deferred for two years... attempt to reduce consumption by 50%...”*

Voluntary routes to achieving better environmental care will always be preferred by the voter to punitive legislative measures. In Australia, politicians have seen the common sense in accepting the strong arguments which suggest that the imposition of a bag tax would not necessarily be for the environmental good. At the same time, there has been a strong motivation towards encouraging retailers to move quickly – together with bag suppliers - to educate the public on the real issues. In the UK, our industry has met with retailers every few months for more than ten years to promote good environmental practice.

Para 30: *“Many other countries... extreme litter problems.”*

Other countries with poor living conditions and little or no sanitation or sewage suffer extreme litter problems of all kinds. This should not be used as an argument for or a model of the situation in Scotland where widely differing standards of social practice, behaviour and drainage/waste technologies are applied. A plastic bag tax in Scotland would have no impact on living conditions elsewhere other than to close down factories manufacturing retail bags for Scottish business.

Para 32: *“For certain types of plastic bags and/or perhaps for certain types of businesses.”*

Such proposed discrimination with regard to the type of bag used, type of material adopted, or the type of business using it must be regarded as potentially “anti competitive” within the context of EU Competition Law. The recent retraction of the Danish “Can Ban” is a good example of why individual member states should not promote or adopt unfair practices such as that advocated by Mr Pringle (which also benefits from no objective scientific assessment of environmental impact).

Para 33: *“Must be used by the local authority... after running costs...for environmental measures and improvements.”*

For the reasons given earlier, no net income would be generated by a plastic bag tax. This might explain the lack of publicity in Ireland regarding genuine net income (following deduction of administration costs by authorities etc) and the application of any such income to bona fide environmental projects in that country. The structure of retailing in the UK also makes it wholly impracticable for local authorities covering small geographical areas yet served by major national and international retail operations to expect that a plastic bag tax could be efficiently or effectively imposed or policed within their geographical area.

Para 34: *“...will help reduce litter and encourage the use of more easily recyclable alternatives... encourage people to consider issues of waste in other areas.”*

The facts show that such a tax cannot and will not reduce litter nor will it increase reuse (already 80% plus) or recycling (already 300,000 tonnes of plastic film). Rather than encourage people to reconsider wider issues of waste, a plastic bag tax would become a major barrier to the efficient, safe collection of waste because it will deprive consumers of a primary use product which is convenient, safe and hygienic for transferring purchases to the home as well as the important secondary or further use product for the safe containment and disposal of household waste and pet fouling which would otherwise represent a serious public health hazard. We estimate that pet owning Scottish households (50%) use up to 700 million carrier bags each year to safely contain pet droppings.

In particular, the Dog Fouling Scotland Act became law on 21 October 2003. This critical public health legislation was necessary because dog excreta contains high concentrations of faecal coliform bacteria, parasitic worms including *Toxocara Canis*, *Echinococcus Granulosus*, and many hookworm infestations. It is estimated that in Scotland the dog owning population (an estimated 19% of households) re-use around 160 million plastic carrier bags in order to comply with this dog fouling legislation and therefore to protect children using playing fields and other public areas from serious health risk.

All householders would need to consider purchasing bin bags and Scottish parents in particular would also be driven to purchasing “nappy disposal bags”.

A FINAL COMMENT

We have tackled each of the statements contained in the public consultation document in an honest and open way using supportable science. Our conclusion is that the proposal for a plastic bag tax in Scotland may be well-meaning but it will cause greater environmental impacts than it is aimed at removing.

The proposal for a bag tax is not argued on science or verifiable facts. It repeats commonly held myth and misinformation using sensationalist statements and unsupported suppositions.

To those not acquainted with a detailed knowledge of environmental impacts, life cycle analysis, polymer science or waste management processes it will at first represent a compelling case for legislation.

For those, like us, who have real concerns about our environment and feel the urgent need to create a more sustainable future for our planet, the idea of a bag tax may seem like a simple and achievable stepping stone towards their goals.

But the effect of a bag tax will be the opposite to that intended.

If the currency of politics is to win votes, then the idea of a plastic bag tax may promise a new income stream for its proponents.

We feel confident, however, that we can rely on the people of Scotland recognising the validity of our science and having the wisdom to wholeheartedly reject these proposals for a 2000% tax which will bring no environmental gain – all at the expense of lost jobs, closed factories and failed businesses.

CBC RESPONSE TO MIKE PRINGLE BAG TAX PROPOSAL - SOURCE REFERENCES

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- **DEFRA/NOP Poll on the Re-use of Plastic Carrier Bags** – October 2000
- **Consumer Attitudes Towards Plastic Bags** – Dept of Business Studies and Economics – Sheffield Hallam University
- **Waste Not Want Not** – The UK Government Cabinet Office Strategy Unit – November 2002
- **Plastic Bag Tax Assessment** – HM Treasury – December 2002
- **Towards a Sustainable Paper Cycle** – International Institute for Environment and Development – 1996
- **Beach Litter Survey** – Marine Conservation Society – 2004
- **Towards Greener Households, Products, Packaging and Energy** – INCPEN – 2002
- **Responsible Packaging Code of Practice for Optimising Packaging and Minimising Waste** – INCPEN – December 2002
- **Hansard, debate on re-usable carrier bags** – 22 November 2002
- **Response to Strategy Unit Interim Report on Waste** – Association of Convenience Stores – October 2002
- **Response to proposals for a Scottish environment levy on carrier bags** – Scottish Retail Consortium – February 2004
- **Response to proposals for an environmental levy in Scotland on carrier bags** – British Retail Consortium – January 2004
- **RGDATA response on increase in theft following Irish bag tax** – March 2003
- **Shoppers are still buying plenty of plastic** – Irish Examiner – January 2003
- **Environmental facts about plastic bags** – PBA – New York 2003
- **Lifecycle Analysis and the Eco-Balance** – PIFA – 2000
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- **Local Environmental Quality Surveys** – ENCAMS – 2002
- **Environmental burdens** – German Federal Office of the Environment – 1988
- **Mid-West Research Institute - New York** – 1974
- **Plastic Bags Impacts** – Gaines LL Argonne National Laboratories – 1981
- **Minutes of DEFRA consultation meeting with retailers and industry on plastic bag taxes and deposits on drink containers** – 20 August 2002
- **CBC survey of 4500 UK retailers' views on plastic bag tax** – September 2002
- **EC Directive 99/31/EC** – Landfill Directive – 1999
- **EC Directive 90/128/EC** – Food Contact Packaging – 1990
- **A Commentary on the Use of Plastic Carrier Bags** – PIFA – May 2002
- **The Winnipeg Packaging Project, Comparison of Grocery Bags** – Winnipeg University – 1991
- **The Degradability of Plastic Films** – CBC – December 2002
- **Study for the Department of Environment and Local Government of Ireland** – Fehily Timoney and Company, Dublin – 1999
- **Plastics in the Environment** – UK Environment Agency – 2001
- **Plastic Shopping Bags, Analysis of Levies and Environmental Impacts** – Nolan-ITU for the Department of Environment and Heritage, Australian Government – December 2002

- **Millions lost through push-outs** – Article published in Shelf Life, Dublin – January 2003
- **Analysis of Household Waste Composition and Factors Driving Waste Increases** – Dr J Parfitt, WRAP – December 2002
- **Treatment of Municipal Waste in the EU** – European Environment Agency – 2002
- **Greenhouse Gases and Waste Management Options Briefing** – Friends of the Earth - January 2000
- **Review of the Environmental and Health Effects of Waste Management** – commissioned by DEFRA from Enviros, Birmingham University et al – May 2004
- **DTI Plastics Recycling Briefing Note** – May 2002

Our grateful thanks also go to the following Scottish businesses who have given freely of their time, energy, support and evidence towards compiling this response:

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