

Bag to Rights

The impact of the Carrier Bag Levy in England, 5 years on



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Foreword

At the Co-op we are passionate about making sure we source and create food with quality, sustainability, and health at the front of mind. Our Future of Food ambition was published back in 2018, and with it our target to reduce our use of single-use plastics, and our plans to introduce compostable carrier bags.

Since making our commitments we have made huge strides and are on track to deliver our commitment that all Co-op own-branded products will be recyclable by the end of 2021. This progress includes the introduction of our unique film recycling approach, which we began trialling at the end of 2020.

Because we're a member-owned organisation, we've been clear in our Future of Food approach that we need to learn and celebrate together. It's with that same ethos in mind we are now introducing this report.

I'm a firm believer in the powerful role that industry can and must play in the critical race to net zero. We must stand together across the industry, in partnership with Government and each other to develop the right policies to drive the right consumer behaviour.

Quite rightly, the Government is very proud of the 95% reduction in single-use plastic carrier bag sales since the introduction of the 5p charge in 2015. It's an incredible achievement and I'm proud to say that here at the Co-op we've been playing our part on this journey since 2006, by selling 1 billion fewer carrier bags each year. We can see the success of the carrier bag levy in driving change within our own business, as it has led to a further reduction of 500 million fewer bags being bought a year since its introduction. In short, we're selling 1.5 billion fewer carrier bags a year than we were in 2006. This equates to around 9,300 tonnes less plastic being used once and thrown away - the equivalent of 1,300 old London buses - each year. However, it's important to identify and address the unintended consequences of taking progressive steps for the benefit of the planet. Your assumption, hearing of a 95% reduction, might be that the target should now be the remaining 5%. Instead, as we set out in this report we believe that it's vitally important that we take stock of the broader picture, and the ultimate goal of the carrier bag levy when it was first reduced: 'To reduce the amount of plastic being placed on the market in bags used just once and thrown away'.

The data in this report tells a compelling story about how the carrier bag levy has been almost universally successful. We now have an opportunity to build on the progress that has already been made, through further ambitious regulation that would lead to a more balanced and holistic approach across the retail sector. I hope you'll read on and be convinced of the need for the three further policy measures that we recommend.

Jo Whitfield Food Chief Executive, The Co-op



Executive Summary

The problem

Here at the Co-op, we care about the world we share. That's why we're always looking for ways to make it easier for our members and customers to do the right thing, when it comes to the impact the choices they make have on people and the planet, when they're shopping in one of our stores.

As one of the nation's largest consumer co-operatives, our members are at the heart of all our decision making. We know just how important the plastic and packaging that we use is to our members: in 2017, they voted for a motion at our AGM to make 80% of our packaging 'easy to recycle' by 2020, and 100% in the future.

We've a much longer history than that on removing hidden plastics and unnecessary packaging. From removing plastic stems from cotton buds before any other retailer 14 years ago, to banning microbeads and removing plastic straws, to banning black plastic from our shelves, we have a strong track record of dealing with the source of plastic pollution. We've been taking action to reduce the number of single-use carrier bags bought by our members and customers since as long ago as 2006. Thanks to the action we've been able to take - and latterly, the success of the Government's carrier bag levy - over 17 billion carrier bags haven't been produced, placed on the market, or indeed sent to landfill as they ultimately would otherwise have been.

We're proud to serve the local community through our 2,600 stores across the United Kingdom, and indeed through the 5,300 stores that we supply through our wholesale operation. We were pleased to launch our in-house, closed loop plastic film recycling trial in Autumn 2020. Thanks to the huge amount of work that has been going on over recent years and this trial, we are well on track to meet our ambition to have 100% easy to recycle own-brand packaging against our target of the end of 2021.

Figure 1: Film Trial

Back in January 2020, we were excited to announce our plans to ensure that 100% of our Co-op brand packaging will be widely recycled. In the absence of any commercial or kerbside solution for our customers and members to recycle 'scrunchable' plastic film, we are on track to deliver against this ambition by the end of 2021 thanks to our unique in-store film collection trial scheme in 50 of our stores.

Through these trial in-store collection points, we've been accepting all types of clean, 'scrunchy' plastic film – from any brand or retailer – including plastic carriers, lids from ready meals and yoghurt pots, microwave pouches, multi-buy wrappers and fruit and veg film. Once collected, the deposited film waste is being sorted and where possible, processed into waste disposal bin liners for use in Co-op stores.

We recognise the significant work underway to review the Government's Waste and Resources strategy and would welcome the inclusion of plastic film within the Consistent Kerbside Collection framework due to be introduced from 2023. In the meantime, we'll be taking the learnings from the trial and, if successful, hope to be able to roll out plastic film collection bins into all of the communities we serve throughout 2,600 stores across the UK. We've learnt a great deal from our balanced approach to providing appropriate carrier bags to meet the needs of all our customers in all our stores, coupled with our efforts to pioneer the provision of compostable carrier bags certified to BS EN13432 in those areas where Local Authorities accept them in their food waste collection services.

However, we're acutely conscious that with a 7% market share, our impact will be much more widely felt when we're able to co-operate with others, and when we share what we're learning as we navigate this journey with the industry and with Government.

With the Government proposing to increase the carrier bag levy from April 2021, and the development of the Waste and Resources Strategy which includes plans for consistent food waste collections to be rolled out across every Local Authority, the time has come for us to speak out on an issue that has been concerning us for some time.

The Government's carrier bag levy has been a huge success over the past five years in that it has driven down the number of disposable single-use plastic bags being bought, by 95%. And, to be clear, we're 100% supportive of the goals of this policy. Only tracking the sales of single-use plastic carrier bags, however, only tells part of the story. We can see that what some customers do instead of buying single-use plastic carrier bags is switch up to heavier weight 'bags for life' that are perceived to offer better value. Based on the volumes being sold, we can see those 'bags for life' are, in many cases, being used on a 'singleuse' basis. This theory is backed up not only by sales data outlined in this report, but by a trial undertaken in our stores too.

Simply put, the problem that we're exposing here is that, in seeking to do the right thing, the Government's carrier bag levy as it stands is in fact increasing the amount of plastic being produced and put onto the market, by as much as 440% over the past three years.

The data is clear: even as many of us have got better at remembering to bring a reusable bag with us when we head to the shops, sometimes we forget (and especially in a convenience store setting), sometimes we nip into the shops when we hadn't planned to, so haven't got a bag handy and - whatever the price - we'll simply buy the cheapest option that's on sale.



The solution

We believe the solution is in three parts, and we've produced this report to provide the Government with the evidence it needs to implement the following three recommendations further to increasing the single-use carrier bag levy to 10p from April 2021:

1. Require all bags subject to the single use carrier bag charge to be certified to BS EN 13432, at a minimum price of 10p, wherever sold. These certified compostable carrier bags have multiple benefits, for everybody concerned:



- Consumers will otherwise continue to buy whatever the cheapest option is and use it on a disposable basis anyway - the problem outlined above will only get worse under the current plan to increase the levy to 10p, which will most likely lead to those retailers still using single-use plastic bags moving to Bag for Life as the entry-price bag to increase the perceived value, in line with the increased minimum price point.
- Counterintuitively, with compostable carrier bags, being a great carrier is in fact their secondary purpose. Their more useful primary purpose is a food-waste bin caddy liner. It won't be long until all Local Authorities need to collect food-waste and the evidence¹ shows that providing compostable carrier bags at a cheap price for the consumer and for local government drives up engagement and therefore helps divert food waste from landfill.²
- New Life Cycle Assessment data shows that using compostable carriers as food-waste caddy-liners will save 76 tonnes of CO₂eq

directly. More importantly, data from the Climate Change Committee shows that extending UK food waste collections would save 1.25 million tonnes of CO₂eq.³

- Reversing the current trend where we're seeing customers use 'bags for life' as single-use could save 81 thousand tonnes of CO₂eq.
- Each Local Authority could save between £80k and £230k⁴ on providing compostable liners. Many have moved to providing polythene liners, but these create plastic pollution.⁵ We estimate that this change could result in a £31.5 million per annum saving across England.
- 2. Regulate to set a minimum price point for reusable carrier bags of 50p. To be exempt from the new requirement that all carrier bags must conform to the BS EN13432 compostable carrier bag certification, reusable bags - of any material - should be subject to a minimum price point of 50p.



3. Require major retailers to report on the use of all reusable bags as well as 'single-use' bags. To ensure Government analysis and any future measures consider the complete picture, a greater level of reporting should be required of major retailers.



- https://www.wrap.org.uk/sites/files/wrap/HH food waste collections guide section 4 caddies and liners.pdf
- 3. Committee on Climate Change, Net Zero: The UK's contribution to stopping global warming. 2019.
- https://www.theccc.org.uk/publication/net-zero-the-uks-contribution-to-stopping-global-warming/ 4. WRAP Case Study, 'Oldham Council innovates with dual-use compostable carrier bags'. 2014.
- https://www.wrap.org.uk/sites/files/wrap/Oldham Council carrier bag case study Dec 2014.pdf

^{1.} WRAP Case Study, 'Oldham Council innovates with dual-use compostable carrier bags'. 2014. https://www.wrap.org.uk/sites/files/wrap/Oldham Council carrier bag case study Dec 2014.pdf

^{2.} WRAP Household food waste collections guide, section 4: caddies and liners. 2016.

^{5.} Weithmann et al, 'Organic fertilizer as a vehicle for the entry of microplastic into the environment'. Science Advances, 2018, 4 (eaap8060). https://advances.sciencemag.org/content/4/4/eaap8060

Main Findings

Co-op's balanced Carrier Bag approach

Here at the Co-op, we believe the UK's carrier bag policy should be designed to deliver the behavioural change required to reduce the overall levels of resource use. Our own balanced approach has been shaped by three tenets:

- **1.** That different shopping missions will need different carrier bag solutions
- **2.** That different types of store will need to offer different solutions
- **3.** Customers who forget to bring a bag, will buy the cheapest solution on offer.

We've been taking action to reduce the number of single-use carrier bags sold throughout our stores since 2006. As a result of steps that we took over 15 years ago, we produced and provided to customers 1 billion bags a year less from 2006 to 2014, and, as a result of the carrier bag levy, 1.5 billion bags a year less every year from 2015 to the present day. It's a great example where industry action coupled with Government intervention has helped to fundamentally change customer behaviour for the better (see Figure 2).



The benefits of Compostable Carrier Bags

It was as long ago as 2007 that we first began this journey, and in 2018, we were proud to introduce our BS EN13432 certified compostable carrier bags at scale. We've made further progress since then that means approximately half of the singleuse carrier bags we sell now meet this standard.

These bags are specifically designed to be used as food-waste caddy-liners, meaning that - along with household food waste - they can be turned into peat-free compost. On our current level of usage, they've enabled us to save over 300 tonnes of conventional single-use plastic annually, but the more important impact is that they help divert methane-producing food waste from landfill. We know this because the biggest barriers to engaging in food waste collection for citizens across the UK are cleanliness and convenience, both of which our bags are designed to address.⁶

In our experience of introducing the compostable carrier bags in stores where the relevant local authority will accept them as food-waste caddyliners, we've found that doing so is beneficial for citizens, for us, and for the nearly 200 local authorities who already accept them:

- It benefits individual citizens, because it gives them a more-environmentally friendly option when on-the-go if they've forgotten their bag for life; it reduces their use of single-use plastic; and it encourages them to use their kerbside food waste collection service because they find that using our bags as caddy-liners is cleaner and more convenient than not using a bag.⁷
- It benefits us, the Co-op, not because we make a profit when we sell the compostable bags at 5p each (and, in fact, we don't), but because we're a community retailer here to serve our customers and members, who expect us to make the right sustainable choices.

 It benefits those local authorities who will accept them in their food waste collection services, because it enables a reduction in costs for procuring and providing caddy liners; it helps to reduce plastic contamination; and by helping to increase food waste collection rates, reduces the amount of food waste that ends up in landfill.

Before introducing the bags to the market, we asked local authorities to help us with the information printed on them. This was important for ease of identification (by residents and waste management collection crews alike), and with their secondary use in mind - BS EN13432 certification confirms they are suitable for use in both Anaerobic Digestion and In-Vessel systems, and OK Compost Home shows their suitability for use at home. Our introduction of compostable carrier bags has been welcomed by many local authorities across the UK, both in in-vessel composting systems and in anaerobic digestion systems. We've spent the past few years engaging with Local Authorities, to increase the number of areas where the bags will be accepted in areas where food waste collections are already undertaken, and to encourage those Local Authorities yet to roll out food waste collection services to accept our BS EN13432 certified bags in their collection service when they do so.

Whether it's our customers being able to save significant amounts per compostable carrier bag compared to buying a roll of bags to put into their food waste caddy, or the Local Authorities keen to encourage citizens to do the right thing and make use of the food waste collection service, we've had great feedback about the bags.



WRAP Case Study, 'Oldham Council innovates with dual-use compostable carrier bags'. 2014. https://www.wrap.org.uk/sites/files/wrap/Oldham_Council_carrier_bag_case_ study_Dec_2014.pdf

^{7.} WRAP Case Study, 'Oldham Council innovates with dual-use compostable carrier bags'. 2014. https://www.wrap.org.uk/sites/files/wrap/Oldham_Council_carrier_bag_case_ study_Dec_2014.pdf

Whether a Local Authority is making use of Anaerobic Digestion or In-Vessel composting food waste processing plants, the compostable carrier bags bring environmental benefit (see a further breakdown at Figure 3):

- By driving up engagement with food waste collections in the first place.8
- Because compostable carrier bags will biodegrade in the marine environment, if they are littered and end up in the sea, we have peer-reviewed data from our resin supplier, Novamont showing that our compostable carrier bags will biodegrade in sea water in less than 12 months.9
- Plymouth University published a paper in Environmental Science & Technology in 2019 showing that compostable carrier bags completely disappeared in 3 months in sea water. By comparison, oxodegradable bags would still carry shopping after 2 years in sea water.¹⁰
- In Anaerobic Digestion systems, where fragments of conventional polythene plastic bags would end up being scattered over fields, ending up in watercourses and in the sea, the compostable carrier bags will continue to biodegrade. We have peer-reviewed evidence from our resin supplier showing biodegradation in soil; an important factor in digestate from AD systems.¹¹
- In In-Vessel composting systems, because • they are certified to BS EN 13432, the bags will compost entirely.12
- New Life Cycle Assessment data shows that our compostable carrier bag has a 16% lower carbon footprint than an equivalent HDPE single-use carrier bag. This is based on worstcase scenarios for compostable carrier bags and best case for HDPE.

You don't just have to take our word for it, though. The Anaerobic Digestion & Bioresources Association (ADBA), the Organic Recycling Association, the Chartered Institute of Wastes Management (CIWM) and the Association for Renewable Energy and Clean Technology (REA) all support the use of compostable carrier bags as caddy liners for food waste collections, and oppose the use of polythene carrier bags. As for the quality of the bags when it comes to serving their secondary purpose (as singleuse carrier bags)? We've never had a single complaint about them!

As a result of the positive environmental benefit of BS EN13432 certified compostable carrier bags, subsidising the supply of the bags is seen as an acceptable use of the monies raised through the charge in England, which makes it cost effective for us to offer these bags as an alternative to conventional single-use bags for our members and customers (because, compared to their more harmful polythene counterparts, they're more expensive).

The proposals we're setting out in this report pave the way for universal food waste collections. Mandating the use of BS EN13432 certified compostable carrier bags across the retail sector would simplify the message for citizens, reduce plastic contamination, and reduce implementation costs for local government. The case for the provision of a sustainable, single-use carrier bag is compelling, as we'll set out now.

^{8.} WRAP Case Study, 'Oldham Council innovates with dual-use compostable carrier bags'. 2014.

https://www.wrap.org.uk/sites/files/wrap/Oldham_Council_carrier_bag_case_study_De 2014.pdf

Rob Cole, 'Novamont's Mater-Bi Bioplastic confirmed as fully marine biodegradable'. Resource, 2019. https://resource.co/article/novamont-s-mater-bi-bioplastic-confirmed-fully-marine-biodegradable

^{10.} Imogen E. Napper and Richard C. Thompson, 'Environmental Deterioration of Biodegradable, Oxo-biodegradable, Compostable, and Conventional Plastic Carrier Bags in the Sea, Soil, and Open-Air Over a 3-Year Period'. Environmental Science & Technology, 2019, 53 (9), 4775-4783.

^{11.} S Chinaglia, M Tosin, F Degli-Innocenti, 'Biodegradation rate of biodegradable plastics at molecular level'. Polymer Degradation and Stability, 2018, 147. M Tosin, A Pischedda, F Degli-Innocenti, 'Biodegradation kinetics in soil of a multi-constituent biodegradable plastic'. Polymer Degradation and Stability, 2019, 166. A Pischedda, M Tosin, F Degli-Innocenti, 'Biodegradation of plastics in soil: The effect of temperature'. Polymer Degradation and Stability, 2019, 170. M Tosin, M Barbale, S Chinaglia, F Degli-Innocenti, 'Disintegration and mineralization of mulch films and leaf litter in soil'. Polymer Degradation and Stability, 2020, 179.

^{12.} British Standards Institution, 'Packaging. Requirements for packaging recoverable through composting and biodegradation. Test scheme and evaluation criteria for the inal acceptance of packaging. 2017. https://www.en-standard.eu/bs-en-13432-2000-packaging-requirements-for-packaging-recoverable-through-composting-and-biodegradation-test-scheme-and-evaluation-criteria-for-the-final-acceptance-of-packaging/

Figure 3: Food Waste Caddy Liner Options

	No Liner	Liner	Supplied by Local Aut	hority	Liner Supplied by Customer/Resident			
Type of Liner		Free Compostable Liner	Free Polythene Liner	Free Paper Liner	Compostable Caddy Liner	Compostable Carrier Bag	Polythene Carrier Bag	Paper Liner
Cost to Local Authority	No cost for liners but reduced yields and therefore less effective collections - material still going to disposal	~£2/household/ year	~£1/household/ year	~£7/household/ year	Zero	Zero	Zero	Zero
Cost to Resident	Zero direct cost. Lower yields lead to higher landfill costs	Zero direct cost. Cost reflected in council tax	Zero direct cost. Cost reflected in council tax	Zero direct cost. Cost reflected in council tax	High - up to 25p each	Low - 10p per bag, opportunity cost zero - bags bought for shopping	Low - 10p per bag, opportunity cost zero - bags bought for shopping	High - 18p each
Impact on Food Waste Collections	Collections less efficient - yields lower - less point in doing the collections	Collections quantities good because of free liner. Depends on quality of liner	Collections quantities good because of free liner. Depends on quality of liner	Collections lower (mess, failed bags)	Collections lower - potential to not bother buying bags	Collections good - if residents get hold of the right carrier bags	Collections good	Collections lower (mess, failed bags, cost)
Impact on Contamination in IVC	Zero contamination if residents comply - potential use of own liners	No contamination	High risk of plastic carry over into compost	Zero contamination	No contamination	No contamination	High risk of plastic carry-over into compost	Reduced contamination - if they use the right ones
Impact on Contamination in AD	Zero contamination if residents comply - potential use of own liners	Low contamination	High risk of plastic carry-over into digestate	Zero contamination	Low contamination, carried through material biodegrades after treatment stage	Low contamination, carried through material biodegrades after treatment stage	High risk of plastic carry-over into digestate	Reduced contamination - if they use the right ones
Impact on Resident Compliance and Engagement	Low resident engagement and low compliance	Good resident engagement	Good resident engagement	Lower resident engagement and lower compliance	Lower resident engagement and lower compliance	Good resident engagement	Good resident engagement	Lower resident engagement and lower compliance
Impact on Local Authority Costs Overall	Higher landfill costs	Lower landfill costs	Lower landfill costs	Higher landfill costs	Higher landfill costs	Lower landfill costs	Lower landfill costs	Higher landfill costs

Figure 4: Feedback on our Compostable Carrier Bags

Since introducing our compostable carrier bags, we've received...

- Zero complaints from Local Authorities who accept our compostable carrier bags in their food waste collection services
- Zero complaints from composters and AD plants
- Less than one customer complaint for every million compostable carrier bags sold
- A Green Apple Award
- An AFOR Award
- Encouragement and requests from several local authorities
- Support from Plastics Europe
- Support from CIWM
- ADBA, REA and ORA support for the use of properly labelled compostable carriers in food waste collections
- Confirmation from the BPF Recycling Working Group that, because of our rules and our labelling, it is highly unlikely that compostable carriers will enter the PE recycling stream
- Further confirmation from the BPF that if the odd bag were to enter the PE stream, it would char and filter out and would therefore not cause any problem other than the normal routine filter change caused by other contaminants



Carrier Bag Usage - 2015-2020

We noted above our belief in the need for a balanced approach to carrier bag policy. This belief is grounded in our experience as a major food retailer with a particular focus on convenience stores, and in our analysis of the available data looking across the sector.

Drawing on the data published by Defra, we commend the fact that single-use plastic carrier bag use has dropped by 95% over the past five years.¹⁴

Only tracking the sales of single-use plastic carrier bags, however, only tells part of the story. We can see that what some customers do instead of buying single-use plastic carrier bags is switch up to heavier weight 'bags for life' that are perceived to offer better value. Based on the volumes being sold, we can see those 'bags for life' are, in many cases, being used on a 'single-use' basis. This observation is backed up not only by sales data outlined in this report, but by a trial undertaken in our stores too.

Other major retailers sought to disincentivise customers from buying single-use carrier bags completely, by removing them from sale in their entirety, and one of these retailers has been transparent in their reporting of the impact (see Figure 5). The impact on the sale of 'bags for life' could not be more stark: customers have simply traded up from single-use carrier bags to heavier weight 'bags for life'. As a result, the amount of plastic therefore being produced and put onto the market has jumped by an astonishing 440%.

Here at the Co-op, we were keen to understand whether our members and customers would behave in the same way. So, we ran a limited trial in a small number of stores, removing single-use carrier bags entirely. We were unsurprised to see exactly the same pattern of behaviour - where there is no single-use alternative available, customers opt for the cheapest available alternative. That's why we believe so strongly in the balanced approach that we have developed over many years, and that we've outlined above.

The issue is therefore that Government's carrier bag levy as it stands is in fact increasing the amount of plastic being produced and put onto the market; by as much as 440%, on the reasonable assumption that the experience of the retailer who has reported on 'bag for life' use is replicated among the other retailers. In order to provide greater value to their customers, we're certainly concerned that this experience could be seen even more widely across the sector from 1 April.

Year	Number of single-use plastic bags issued	Number of 'bags for life' issued	Number of bags	Weight of single-use bags tonnes	Weight of 'bag for life' tonnes	Total weight of bags tonnes
2016-17	67,203,919	3,750,662	70,954,581	410	108.7692	519
2017-18	75,499,387	3,818,852	79,318,239	461	110.7467	571
2018-19	38,138,993	74,797,563	112,936,556	233	2159.129	2402
2019-20	3,466	106,522,086	106,525,552	0	3089.14	3089

Figure 5: single-use carrier bag use and the impact on 'bag for life' sales

14. Department for Environment, Food & Rural Affairs. Carrier bag charge: summary of data in England. 2020. https://www.gov.uk/government/publications/carrier-bag-charge-summary-of-data-in-england_ We can also learn from other comparable nations. See Figure 6, for insight into the Italian experience.

Figure 6: Italian Experience

A fear that the reduction in overall single-use carrier bag usage might be reversed if BS EN13432 compostable carrier bags were mandated – as a result of the positive customer perception of compostable carrier bags – is understandable. However, the available data suggests that this need not be a concern.

Our own experience, in the 1,100+ stores where we have rolled out compostable carrier bags already, we have seen a continued reduction in overall demand. We can also look to the data based on the Italian experience of banning single-use conventional plastic carrier bags.

In Italy, compostable carrier bags were mandated from 2013, and the data is clear that overall carrier bag numbers continue to fall year-on-year to this day. The evidence from Italy also shows a reduction in the demand for municipalities to provide caddy liners and a reduction in plastic pollution in food waste treatment.

Conclusion

The data is clear: even as many of us have got better at remembering to bring a reusable bag with us when we head to the shops, sometimes we forget – and (especially in a convenience store setting) sometimes we nip into the shops when we hadn't planned to, so haven't got a bag handy and – whatever the price – we'll simply buy the cheapest option that's on sale.

In summary, the implications of this analysis are as follows:

- The demand for bags to use once and throw away has a significant degree of inelasticity. Demand remains relatively high as price increases. Customers who are looking for a single-use bag will buy the cheapest available at a substantially higher price point than 5p.
- 2. Increasing the charge on single-use bags alone is likely to lead retailers to "improve" the bag to give the customer value for money. That means:
 - a) Heavier duty bags.
 - **b)** Increased plastic footprint per bag.
 - c) Overall increase in plastic usage the very opposite of the policy intent.

 Charging has been successful to a very large extent in reducing demand and driving reuse. But, clearly some customers will still expect single-use bags in some circumstances. Other measures to reduce demand have also been successful, for instance, providing reusable bags and removing single-use bags from customer access.



Next steps for Carrier Bag Charging Policy

Taking the success story that compostable carrier bags represent in the round (against their primary purpose as food-waste caddy-liners that provide wider environmental benefit, and their secondary purpose as single-use carrier bags that remove the need for single-use polythene bags to be produced and placed on the market), we believe that the time has come for a new world-leading standard in carrier bag policy to be set across the UK.

Whilst these findings are equally applicable across the four nations of the UK, two specific developments in England have provoked the publication of this report at the present time.

The first is the review undertaken by the Department for the Environment, Food and Rural Affairs and the decision to increase the carrier bag levy from 5p to 10p. We support this increase, and believe the review provides an opportunity to take a more wide-ranging view of the current policy.

The second is the imminent expansion of consistent kerbside collections across Local Authorities in the UK. We believe that it's our role to start paving the way for this change and to do everything we can to encourage our members and customers to engage with food waste collection services as they are rolled out.

We believe that there are three steps that the UK Government should now take.

- Require all bags subject to the single use carrier bag charge to be certified to BS EN 13432, at a minimum price of 10p, wherever sold. These certified compostable carrier bags have multiple benefits, for everybody concerned:
 - Consumers will otherwise continue to buy whatever the cheapest option is and use it on a disposable basis anyway - the problem outlined above will only get worse under the current plan to increase the levy to 10p, which will most likely lead to those retailers still using single-use plastic bags moving to 'bags for life' as the entryprice bag to increase the perceived value, in line with the increased minimum price point.

- Counterintuitively, with compostable carrier bags, being a great carrier is in fact their secondary purpose. Their more useful primary purpose is a food-waste bin caddy-liner. It won't be long until all Local Authorities need to collect food waste and the evidence¹⁵ shows that providing compostable carrier bags at a cheap price for the consumer and for local government drives up engagement and therefore helps divert food waste from landfill.¹⁶
- New Life Cycle Assessment data shows that using compostable carriers as food-waste caddy-liners will save 76 tonnes of CO₂eq directly. More importantly, data from the Climate Change Committee shows that extending UK food waste collections would save 1.25 million tonnes of CO₂eq.¹⁷
- Reversing the current trend where we're seeing customers use 'bags for life' as singleuse could save 81 thousand tonnes of CO₂eq.
- Each Local Authority could save between £80k and £230k¹⁸ on providing compostable liners. Many have moved to providing polythene liners, but these create plastic pollution.¹⁹ We estimate that this change could result in a £31.5 million per annum saving across England.
- 2. Regulate to set a minimum price point for reusable carrier bags of 50p. To be exempt from the new requirement that all carrier bags must conform to the BS EN13432 compostable carrier bag certification, reusable bags - of any material - should be subject to a minimum price point of 50p.
- 3. Require major retailers to report on the use of all reusable bags as well as 'single-use' bags. To ensure Government analysis and any future measures consider the complete picture, a greater level of reporting should be required of major retailers.

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^{15.} WRAP Case Study, 'Oldham Council innovates with dual-use compostable carrier bags'. 2014.

^{19.} Weithmann et al, 'Organic fertilizer as a vehicle for the entry of microplastic into the environment'. Science Advances, 2018, 4 (eaap8060). https://advances.sciencemag.org/content/4/4/eaap8060

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