



**PE1535/C**

Public Petitions Committee  
The Scottish Parliament  
Edinburgh  
EH99 1SP

Submitted by Email

15<sup>th</sup> January 2015

Dear Convener

**Petition PE1535: ban of all disposable plastic bags**

The Scottish Retail Consortium (SRC) is grateful for this opportunity to provide our comments to the Committee regarding the above petition.

As the leading trade association for the sector, the Scottish Retail Consortium (SRC) represents the full spectrum of Scottish retail, from small independents to large multiple retailers, covering town centre, out of town, rural and online.

The SRC and our members have serious reservations about the proposal to ban polythene bags as we believe that such a measure would be unnecessary, inconvenient, expensive for consumers and would lead to the diversification to less resource efficient alternatives.

Our members have, over many years, been very successful in reducing single-use carrier bag usage with reductions of over a third between 2006 and 2012. However, we were always clear that if the Scottish Government wanted to achieve further reductions then a mandatory charge would be required. As evidence from Wales demonstrates the carrier bag charge has the potential to realise a reduction in the number of single-use carrier bags being distributed by around 80 per cent. Initial evidence from retailers in Scotland would suggest that the charge has, already, started to have an impact.

The Committee should also be aware that not all purchases in retail are planned and a great many are impromptu. This is particularly the case for clothes and fashion purchases but can also apply to grocery sales. From the customer's perspective it would be both impractical and undesirable not to provide the option of a bag in which to transport purchases. This means that there would have to be an alternative to polythene bags if a ban was imposed. However, all carrier bags have an environmental impact and it is important that the Committee considers the entire life cycle of a bag material, of which polythene is one of the most resource efficient. By prohibiting polythene bags this policy would simply mean that retailers would have to move to an alternative, less resource



efficient, material such as paper. As evidence<sup>1</sup> shows, paper bags create a carbon footprint that is around four times greater than polythene equivalents.

Furthermore, leak-proof bags are often necessary to keep certain unpackaged foodstuffs separate or to protect clothing or other delicate items from liquid damage. Polythene bags are the best means by which to do this. Many other obvious alternative bag materials, such as paper, do not provide the same level of protection risking damage to goods or, worse, the cross contamination of food items.

In evidence to the Committee the petitioner also argued that polythene bags have been banned in other developed countries such as Germany and Australia. However, it is our understanding that whilst Germany was considering a possible ban of polythene bags no legislation has, to date, been passed and there is no ban currently in force in Germany. Also, in those countries where bans have been pursued, such as in some (but not all) of the Australian states other less resource efficient materials are used instead, including paper.

Finally, a complete prohibition of polythene bags would have a significant business impact both on the retailer but also on the bag manufacturing industry. We would therefore respectfully suggest that, in line with the Scottish Government's Better Regulation principles, a full Business Regulatory Impact Assessment would be required to establish the full regulatory cost and impact of this policy to businesses across the supply chain before embarking on any further serious consideration of the proposal.

It would, therefore, seem to be over-zealous to proceed headlong into a full prohibition. To do so, would suggest that both the Parliament and the Scottish Government now believe that the charge, which was only introduced in October 2014 and at some cost and operational upheaval to retailers, is the wrong policy despite the evidence demonstrating the contrary. It would also mean that a number of charitable, environmental and other good causes would forgo the monies that all leading retailers have committed to donate arising from the charge. Whilst we must be clear that the revenue from the charge should diminish over time and is not the *raison d'être* of the policy, it is nonetheless a positive consequence which would be lost if a ban was implemented.

The SRC would be delighted to expand on any of the points made or to provide supplementary evidence to the Committee.

Yours sincerely,

David Martin  
Head of Policy & External Affairs, SRC

---

<sup>1</sup> Environment Agency, Life cycle assessment of supermarket carrier bags: a review of the bags available in 2006, [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/291023/scho0711buan-e-e.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/291023/scho0711buan-e-e.pdf)