

Consultation on Private Members' Bill Plastic Bag Levy

Comments by

Northern Ireland Environment Link

13 May 2010

Northern Ireland Environment Link (NIEL) is the networking and forum body for non-statutory organisations concerned with the environment of Northern Ireland. Its 58 Full Members represent over 90,000 individuals, 262 subsidiary groups, have an annual turnover of £70 million and manage over 314,000 acres of land. Members are involved in environmental issues of all types and at all levels from the local community to the global environment. NIEL brings together a wide range of knowledge, experience and expertise which can be used to help develop policy, practice and implementation across a wide range of environmental fields.

These comments are agreed by Members, but some members may be providing independent comments as well. If you would like to discuss these comments further we would be delighted to do so.

Prof Sue Christie, Director
Northern Ireland Environment Link
89 Loopland Drive
Belfast, BT6 9DW
P: 028 9045 5770
E: Sue@nienvironmentlink.org
W: www.nienvironmentlink.org

Northern Ireland Environment Link is a Company limited by guarantee No NI034988 and a Charity registered with Inland Revenue No XR19598

Introduction

Northern Ireland Environment Link welcomes the proposed Bill to introduce a levy on the use of plastic bags. While this Bill's goal is worthy in and of itself, it also has a broader aspect in the raising of awareness around environmental issues surrounding climate change and waste issues in general. By providing all consumers with a tangible disincentive to take and waste plastic bags it will encourage them to recognise both the issues around their disposal and production and how these relate to the need to address climate change, waste management and promote more sustainable lifestyles.

We are particularly supportive of the proposal that the funds raised from the sale of plastic bags will be used to provide an environmental fund. We would encourage that this fund be used to support the delivery of direct environmental improvements through supporting the voluntary and community sector. Not only will this provide funds for much needed projects which are currently finding difficulty with funding, but it will also serve to counter any claims that the levy is purely a money making exercise by the government, a claim which has often been used in the past to undermine the green credentials of levy schemes. It will also establish the principle of hypothecation of green fees for green benefits, an approach which is popular and effective.

This levy will make a positive contribution to the goals within at least three of the main policy aspects of NIEL's work: climate change, sustainable development and environmental protection. We encourage you to pursue this Bill.

Specific Comments

1. Agree . the benefits of charging for bags will decrease their use and encourage more sustainable alternatives.

2. Agree . 15 pence is a significant amount that it will act as a deterrent to casual use of bags and an incentive for people to bring reusable containers. We support the exemption of single use bags for certain materials such as raw meat. The goal of this tax is to decrease use and careless discarding of plastic bags, not to introduce an additional revenue stream. Retailers should also be encouraged to provide benefits for people who bring their own bags (club points, pence off for each bag used), and to introduce/continue free bags for life to encourage people to bring their bags and get them in the habit of doing so. These measures could help significantly to change behaviour in advance of the tax being introduced and avoid any perception that the levy is just to raise money or a tax on the poor.

3. Unsure . Targeting only zero waste initiatives may be too narrow and be difficult to define. We would suggest that the fund be used to fund projects which encourage waste reduction and facilitate moving up the waste management hierarchy. This will also allow more organisations and programmes to potentially benefit. The funds could be integrated into any existing waste funding for voluntary and community organisations already in place (none at present but some may be in development). We feel that it is important that the primary target of funding should be the voluntary and community sector, not central government departments or agencies or private companies. Thought must be given as to whether local authorities should be eligible; we would suggest that they should only be eligible when working in partnership with the voluntary and community sector. TSN areas may not be the most appropriate targeting mechanism; better to target existing organisations with active community support.

4. Unsure . retailers will be benefiting from reduced costs of producing and distributing bags; it may be that this is sufficient compensation for the amount of extra expense incurred in running the scheme. If it is not, consideration could be given to allowing retailers a small amount of revenue to support its introduction during the first year only. Alternatively, to spare small shops additional cost and bureaucracy, the tax might be placed on producers or distributors of bags (those who distribute to the smaller shops).

5. Agree . these are all important objectives.

6. Agree . the possibility of penalising those retailers who do not comply is a necessary incentive to ensure that all retailers comply with the levy provisions. The penalty amount should be sufficient to cover the costs of monitoring and policing the delivery as advocated under the polluter pays principle.