

Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith /  
Climate Change, Environment and Infrastructure Committee  
Bil drafft Diogelu'r Amgylchedd (Cynhyrchion Plastig Untro) (Cymru)/  
Draft Environmental Protection (Single-use Plastic Products)(Wales) Bill  
SUP\_07  
Ymateb gan / Evidence from Co-op

Thank you for the opportunity to respond to the consultation on the draft Environmental Protection Bill for Wales. We fully support the intent of the Bill and largely agree with the provisions within it, however we would like to draw your attention to some unintended consequences arising from the Bill as it currently stands in respect to table 1 (carrier bags).

As it is currently worded, the Bill would prohibit the sale of compostable carrier bags in Wales, but allow the continued sale of 55 micron 'Bags for Life'. Here at the Co-op, we sell single use compostable bags made from mater-bi, a compostable bioplastic, and reusable shopping bags which are made from 100% recycled and 100% recyclable PET and polypropylene.

After extensive consideration of the resource impact associated with all types of carrier bag, and consumer insight as to our member and customer shopping habits, we moved all our single use carrier bags to mater-bi. We published all the evidence that sits behind our decision, and recommendations to governments, in our 'Bag to Rights' report which I attach here. We know there is a balance to be struck between meeting customer needs and driving consumer behaviour change, and we also know that the unintended consequences of the carrier bag charge in driving up the number of 'Bags for Life' being sold (with associated higher resource use per unit) have been very significant. In our report, we cited the finding from another retailer that the amount of plastic used increased by as much as 440% when they removed single use carrier bags in favour of only offering Bags for Life. Therefore, we would recommend the following:

- A ban on conventional single use carrier bags, with an exception for compostable carrier bags certified to BS EN 13432 (as noted in the attached, there are significant benefits in doing so in encouraging uptake of home food waste collection services), with a minimum price in line with the current single use carrier bag charge of 10p.
- A higher minimum price of at least 50p on all other types of reusable bag (which would effectively ban Bags for Life which would not be attractive to customers at this price point).
- Greater transparency, with all large retailers required to report on the number of all types of carrier bag sold, including 'Bags for Life'.

Co-op members are highly engaged on this topic and support our approach to compostable bags which has the lowest overall environmental impact when reused as a food waste caddy liner. That's part of the reason we've already taken the action outlined above. We believe that it's important – especially as a primarily convenience format food retailer – to offer a single use bag – with as low an overall environmental impact as possible, and that has a valuable secondary use as a food waste caddy liner. There are many scenarios where customers may not be able to carry a reusable bag, and the consumer insight that we have shows that the vast majority of customers will simply buy the cheapest option available to them, if they've not got a bag with them. We would hope not to have to change our approach (given that we have switched to certified compostable single use bags and removed Bags for Life altogether) as a result of a ban being introduced.

As alluded to in Para. 4(2)(a), should you decide to add wet wipes to the list of prohibited items, we would urge you to make a similar exception for wet wipes made from viscose. We have already moved all of our own brand wet wipes to viscose, a compostable bioplastic which is considered to be 'plastic free'. We fully support a ban on conventional plastic wet wipes, because it would support our efforts to make it easier for our members and customers to do the right thing for the planet. We would also welcome a ban because it would help to move the market in the same way we have already moved for our own brand wipes. We believe that it's important to provide our members and customers with a more responsible alternative to conventional plastic wet wipes, but would not be able to do so without a suitable exemption for viscose based wipes.

We believe that our approach is the most environmentally responsible one and would be very happy to discuss all the findings in our attached report and the recommendations that we have set out.

**Report:** [Co-op Bag to Rights - The impact of the Carrier Bag Levy in England, 5 years on](#)