

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\_31  
Ymateb gan Cymdeithas Siopau Cyfleustra / Evidence from Association of  
Convenience Stores



### **ACS Submission: Draft Environmental Protection (Single-use Plastic Products) (Wales) Bill**

ACS (the Association of Convenience Stores) welcomes the opportunity to respond to the Climate Change, Environment, and Infrastructure Committee's consultation on the draft Environmental Protection (Single-use Plastic Products) (Wales) Bill. ACS represents 33,500 local shops across the UK, including 2,975 local shops in Wales.

ACS supports the principle of the Bill to reduce our reliance on single-use plastics, changing habits and making products and services more sustainable. Convenience retailers are making efforts to reduce the amount of single use plastics in their business.

ACS has already provided feedback to the Welsh Government via informal consultation with Government Officials and industry working group meetings. We have also raised concerns about the Welsh Government's limited amount of consultation with businesses concerning the proposals in the Bill and the range of products that will be impacted.

We have answered the relevant consultation questions from the Committee's terms of reference below.

#### **Whether a Bill is needed to introduce a ban on commonly littered single-use plastic items?**

We recognise the need to reduce single use plastic items and the shift towards a more circular economy. We want to see a unified approach to tackling single use plastics across the UK. It will be important for the Welsh Government to outline how the introduction of bans on single use plastic items will align with wider UK initiatives. For example, the introduction of extended producer (EPR) reforms and the introduction of single use cup take back schemes.

#### **Whether the provisions of the draft Bill will deliver the policy intention?**

The introductions of bans for single use plastic items will reduce single use plastics and force consumers to change their habits. We have urged the Welsh government to ensure there are sufficient lead time for the introduction of the bans.

Where bans are introduced, retailers need sufficient time to sell through existing stocks and source alternative products. We recommend that at least 12 months implementation period is needed from when government guidance on the regulations is published. Failure to provide sufficient lead time could result in rushed switches to alternative materials that may have an equally detrimental impact on the environment.

The Bill makes no provision for the sell through period offered to retailers and other businesses using single use plastic items. This will be determined by Ministers in secondary legislation.

### **Whether there are any unintended consequences arising from the draft Bill?**

We have not identified any unintended consequences of the Bill. We believe that elements of the Bill could be redrafted to be clearer. The exemptions for single use plastic items outlined in Table 1 is poorly worded and therefore difficult to understand. For example, there is an exemption for “A lid that is not made from polystyrene”. The exemptions criteria should be expressed directly.

Supporting guidance will also be needed for businesses to understand the definition of oxo-degradable plastic. A more extensive definition will be needed beyond what is given in Schedule 1 (2).

### **Whether the powers in the draft Bill for Welsh Ministers to make subordinate legislation are appropriate?**

We recognise the need to give Ministers powers to amend single use products and exemptions listed in table 1. We think it would be useful for the Bill to directly require Ministers to consult with relevant stakeholders impacted by future bans and set out a clear implementation timeframe for bans introduced under secondary legislation.

### **The financial implications of the draft Bill (including for businesses and consumers).**

The financial implications of the draft Bill will depend on the lead times given to businesses for the introduction of the ban. Feedback from our members suggests that they have to find alternative suppliers for a wide range product. For example, single use cups are used for coffee, ice cream, soups and slush drinks.

Retailers will have to invest time to engage with their suppliers to find alternative materials. We have recommended that the Welsh Government have a minimum implementation period of 12 months from when the final guidance on the regulations is published.

There will also be a financial impact on the charities that our members donate their single use carrier bag charges to. There is no requirement on small businesses to report the number of their single use bags issued so it is difficult to estimate the total costs associated with this. However, it is likely that many charities will be impacted by reduced income from the end of plastic bag charges.

**For more information on this submission please contact Edward Woodall, ACS  
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