



ACS Submission – Extending the Single-Use Carrier Bag Charge

ACS (the Association of Convenience Stores) welcomes the opportunity to respond to the Department for Environment, Food and Rural Affairs' consultation on proposals to extend the single-use carrier bag charge to all retailers and to increase the minimum charge to 10p. ACS (the Association of Convenience Stores) is a trade association, which represents over 33,500 convenience stores across the UK, including Spar UK, Nisa Retail, Costcutter and thousands of independent retailers. For more information about ACS and the convenience sector, see Annex A.

Currently, 46% of independent convenience retailers already voluntarily charge for single-use plastic bags and 79% support the charge being extended to smaller retailers¹. ACS worked with Defra last year to develop and promote a voluntary single-use plastic bag charge to small retailers. ACS monitored the uptake of independent convenience retailers voluntarily charging for single-use plastic bags and saw a 4% increase in the number of retailers charging².

ACS has been campaigning for the extension of plastic bag charge to small retailers for some time as we have seen how well it has worked in Wales and Scotland. Small retailers have used it as an opportunity to contribute to their local community by donating the proceeds of the plastic bag charge to good causes, cutting their costs by reducing the number of bags they have to buy, and having a positive impact on the environment. We believe that a consistent approach to plastic bag charging in England will give all retailers the chance to raise money for good causes and contribute to the positive environmental impact of reducing the number of carrier bags in circulation.

Therefore, we welcomed the Department for Environment, Food and Rural Affairs' proposals to extend the single-use carrier bag charge to all retailers in England. However, as recognised in the consultation, the government should avoid further regulatory and financial burdens by ensuring that small retailers are exempt from reporting requirements, similar to the approach for the single-use plastic bag charge in Wales and Scotland. We would support the government's plans to exempt retailers with fewer than 250 FTE employees from reporting requirements.

We believe that since its introduction in October 2015, the single-use plastic bag charge has been effective in reducing the number of single-use plastic bags in circulation. Reporting by large supermarkets suggests that the use of single-use plastic bags has fallen by 86%³. As such, we do not have a strong view on whether the charge should be increased given that the existing 5p charge has successfully change consumer behaviour. We would like to see

¹ ACS Voice of Local Shops Survey August 2018

² ACS Voice of Local Shops Survey November 2017 & August 2018

³ [Defra: Plastic bag sales in 'big seven' supermarkets down 86% since 5p charge](#)

the government take views from consumers when considering increasing the single-use carrier bag charge. Therefore, we have commissioned consumer polling by Populus. The consumer polling found that 56% of consumers supported an increase in the price of single-use plastic bags from 5p to 10p and of those who currently purchase single-use plastic bags, 44% would buy fewer single-use plastics bags as a result of the increase⁴.

Please see below for ACS' response to the relevant questions.

Q5. The government proposes to extend the Single Use Carrier Bag charge to all retailers in England. Do you agree with this proposal?

Yes. ACS has been calling for the extension of plastic bag charge to small retailers for some time as we have seen how well it has worked in Wales and Scotland. Small retailers have used it as an opportunity to contribute to their local community by donating the proceeds of the plastic bag charge to good causes, cutting their costs by reducing the number of bags they have to buy, and having a positive impact on the environment.

Of the independent convenience retailers that already voluntary charging for carrier bags in England, 51% donate to "another local charity", 21% donate to "another national charity", 8% donate to a health charitable cause", 5% donate to a local school, 3% donate to a local sports team and 1% donate to "an environmental charitable cause. We believe that a consistent approach to plastic bag charging in England will give all retailers the chance to raise money for good causes and contribute to the positive environmental impact of reducing the number of carrier bags in circulation.

However, if the single-use plastic bag charge is to be extended to smaller retailers, the government must avoid placing further regulatory and financial burdens on small retailers by ensuring that they are exempt from reporting requirements. Therefore, we welcome the government's plans to exempt retailers with fewer than 250 FTE employees from reporting requirements. We would not support the extension of the plastic bag charge to smaller retailers if there are requirements for them to report the number of plastic bags used in their business.

Q6. Do you agree with the assumptions and the assessment of costs and benefits in the impact assessment on extending the charge to all retailers?

We have seen that the majority (89%) of convenience retailers who voluntarily charge for single-use plastic bags in England donate their net proceeds to good causes. We have not heard from convenience retailers that they are deciding to instead keep 100% of the charge so that they can pass this income on to consumers in the form of lower priced goods. The government should expect that the extension of the carrier bag charge to smaller retailers will lead to the net proceeds being passed onto good causes rather than consumers as seen as a result of the single-use carrier bag charge for larger retailers.

While the government's impact assessment takes into account the familiarisation costs for small retailers to comply with the legislation, it does not consider the costs of communicating the mandatory extension of the charge to smaller retailers. While trade associations, including ACS, will raise awareness amongst our membership about the extension of the carrier bag charge, we believe that the government should consider updating/developing

⁴ Populus UK Consumer Polling February 2019

materials to communicate the extension of the charge to smaller retailers to ensure a smooth transition – similar to what was developed for the introduction of the single-use carrier bag charge in 2015.

The impact assessment recognises IT costs associated with reorganising checkout systems to include a charge for single use bags or update to increase the charge, stating: “a large proportion of the affected businesses are not expected to incur costs of major IT changes”. However, ACS’ Local Shop Report 2018 suggests that 69% of convenience retailers have an Electronic Point of Sale (EPoS) system and as such would incur costs related to IT changes from having to update their systems

Q7. Do you support the proposal to increase the minimum charge from 5p to 10p?

We believe that since its introduction in October 2015, the single-use plastic bag charge has been effective in reducing the number of single-use plastic bags in circulation. Reporting by large supermarkets suggests that the use of single-use plastic bags has fallen by 86%⁵. As such, we do not have a strong view on whether the charge should be increased given that the existing 5p charge has successfully change consumer behaviour. To support the government’s thinking on increasing the single-use carrier bag charge, we would like to see the government consider views of consumers, therefore we have commissioned consumer new consumer polling by Populus. The consumer polling found that 56% of consumers supported an increase in the price of single-use plastic bags from 5p to 10p and of those who currently purchase single-use plastic bags, 27% were opposed to an increase and the remaining responded neither support or oppose or don’t know⁶.

Those who buy single-use plastic bags were then asked about whether the increase in price would change their behaviour, 44% responded that they would buy fewer single-use plastic bags and use the bags they already own, 26% would buy fewer single-use plastic bags and buy more bags for life, and 25% responded that it would not change their behaviour⁷. The government must carefully consider the impact that an increase to the carrier bag charge will have on customers compared with the increase in behaviour changes already delivered by a 5p charge.

Q8. Do you agree with the government’s assessment of the impact on the consumption of single use carrier bags as a consequence of increasing the charge from 5p to 10p?

The impact assessment sets out that the “objective of the charge is to move consumer behaviour away from single use carrier bags and encourage the use of alternative options, such as ‘bags for life’”. Based on Populus polling of consumers, which found that 20% of consumers would buy fewer single-use plastic bags and use bags they already own, we believe that the increasing the charge from 5p to 10p could discourage purchases of single-use plastic bags. However, only 12% of consumers responded that they would buy more bags for life in response to the increase in price of single-use plastic bags.

⁵ [Defra: Plastic bag sales in 'big seven' supermarkets down 86% since 5p charge](#)

⁶ Populus UK Consumer Polling February 2019 (when asked: Would you support or oppose increasing the price of single-use plastic bags from 5p to 10p?)

⁷ Populus UK Consumer Polling February 2019

The government's assessment of the impact on the consumption of single-use carrier bags as a consequence of increase the charge from 5p to 10p does not consider costs to communicate the charge to consumers. It is important that the government develop communications, similar to the original communications developed when the charge was initially introduced in 2015, to ensure a smooth transition. If the increase is not well communicated, retailers may experience customer backlash. Therefore, we would like to clarify whether Defra will be updating/developing materials for retailers to display in-store for consumers to familiarise themselves with the charge. We strongly recommend that if the government is to increase the charge that materials are developed to be displayed in-store for consumers to familiarise themselves with the changes.

Q9. Do you agree with the government's assessment of the impact on consumption of bags for life as a consequence of increasing the charge from 5p to 10p?

Based on consumer polling conducted by Populus in February 2019 of 1,000 consumers, we believe that there could be a limited impact on the purchase of bags for life. 65% of consumers stated that increasing the price would not change their behaviour (54% of which responded do not use single-use plastic bags). Of those that do buy single-use plastic bags, 44% responded that they would buy fewer single-use plastic bags and use the bags they already own, 26% would buy fewer single-use plastic bags and buy more bags for life, and 25% responded that it would not change their behaviour.

Q10. Would you support a requirement for producers of plastic packaging to separately report the number of single use carrier bags they place on the UK market as part of their obligation under the Producer Responsibility Obligations (Packaging Waste) Regulations 2007 (see para 36)?

We welcome that the government has decided to reduce burdens on small retailers by exempting them from reporting requirements. However, we would welcome further information on the government's plans to introduce a requirement for producers of plastic packaging to separately report the number of single use carrier bags they place on the market. For example, how is "producers of plastic packaging" being defined? Under the current PRN system, obligated producers refer to businesses which own the packaging, supply packaging or packaging materials at any stage in the supply chain which handle at least 50 tonnes of packaging and have a turnover of more than £2m a year. We would welcome clarity to whether the requirement would only apply to the producers of the packaging material rather than requirements placed on the whole of the supply chain, which could including convenience retailers.

Q11. Do you support the proposal to remove the existing exemption for carrier bags supplied at security restricted areas at airports (apart for the supply of duty-free alcohol and tobacco sales in sealed bags)?

N/A

Q12. Do you support the proposed date of January 2020 by which changes will enter force?

We would welcome clarity on the government's current timeframes for extending the carrier bag charge to smaller retailers and increasing the price of the carrier bag charge. The consultation document sets out that the extension of the carrier bag charge to smaller

retailers would take effect in 2019 while the increase to the carrier bag charge would take effect from January 2020. We believe that the two measures should be introduced at the same time which would mean that communications to retailers and consumers could accommodate both changes to the single-use carrier bag charge. This would reduce confusion amongst retailers and consumers as well as potentially saving money from familiarisation costs and additional communication materials being produced at different times.

Moreover, we would welcome clarification to when in 2019 that the government intend to extend the carrier bag charge to smaller retailers. In 2015, the Single Use Carrier Bags Charges (England) Order 2015 was approved in Parliament allowing just over six months for the government to develop guidance and for retailers to familiarise themselves with the regulations. We believe that there should be a similar transition period for retailers to comply to the mandatory charge.

Q13. Please provide any evidence or information that moving to a mandatory approach would encourage small retailers to act more uniformly, indicating the level of enforcement that might be needed?

We believe a minimal level of enforcement will be required to ensure that small retailers are complying with a mandatory carrier bag charge. As recognised in the consultation document, SMEs would have no incentive not to charge for single-use carrier bags as they are able to be compensated by deducting reasonable costs of the charge.

Q14. Please provide any evidence that demonstrates large retailers' levels of compliance with the existing obligation to charge a minimum of 5p for single use carrier bags?

N/A

Q15. Is there anything else you would like to tell us relating to the proposals set out in the consultation? In particular, is there any additional evidence that we should consider.

N/A

For more information on this submission, please contact Julie Byers, ACS Public Affairs Manager by emailing julie.Byers@acs.org.uk or calling 01252 515001.

ANNEX A

ABOUT ACS

The Association of Convenience Stores lobbies on behalf of over 46,000 convenience stores across mainland UK on public policy issues that affect their businesses. ACS' membership is comprised of a diverse group of retailers, from small independent family businesses running a single store to large multiple convenience retailers running thousands of stores.

Convenience stores trade in a wide variety of locations, meeting the needs of customers from all backgrounds. These locations range from city centres and high streets, suburban areas such as estates and secondary parades, rural villages and isolated areas, as well as on petrol forecourts and at travel points such as airports and train stations.



WHO WE REPRESENT

INDEPENDENT RETAILERS



ACS represents over 19,000 independent retailers, polling them quarterly to hear their views and experiences which are used to feed in to Government policy discussions.

These stores are not affiliated to any group, and are often family businesses with low staff and property costs. Independent forecourt operators are included in this category.

SYMBOL GROUPS AND FRANCHISES



ACS represents over 14,000 retailers affiliated with symbol groups. Symbol groups like SPAR, Nisa, Costcutter, Londis, Premier and others provide independent retailers with stock agreements, wholesale deliveries, logistical support and marketing benefits.

Symbol group forecourt operators and franchise providers like One Stop are also included in this category.

MULTIPLE AND CO-OPERATIVE BUSINESSES



ACS represents over 12,000 stores that are owned by multiple and co-operative retailers. These businesses include the Co-Operative, regional co-operative societies, McColls and others.

Unlike symbol group stores, these stores are owned and run centrally by the business. Forecourt multiples and commission operated stores are included in this category.

THE CONVENIENCE SECTOR



In 2018, the total value of sales in the convenience sector was £39.1bn.

The average spend in a typical convenience store transaction is £6.50.



There are 46,262 convenience stores in mainland UK. 72% of stores are operated by independent retailers, either unaffiliated or as part of a symbol group.



The convenience sector provides flexible employment for around 365,000 people.

24% of independent/symbol stores employ family members only.



24% of shop owners work more than 70 hours per week, while 19% take no holiday throughout the year.

70% of business owners are first time investors in the sector.



Convenience stores and Post Offices poll as the two services that have the most positive impact on their local area according to consumers and local councillors.

81% of independent/symbol retailers have engaged in some form of community activity over the last year.



Between August 2017 and May 2018, the convenience sector invested over £814m in stores.

The most popular form of investment in stores is refrigeration.

OUR RESEARCH

ACS polls the views and experiences of the convenience sector regularly to provide up-to-date, robust information on the pressures being faced by retailers of all sizes and ownership types. Our research includes the following regular surveys:

ACS VOICE OF LOCAL SHOPS SURVEY

Regular quarterly survey of over 1,200 retailers, split evenly between independent retailers, symbol group retailers and forecourt retailers. The survey consists of tracker questions and a number of questions that differ each time to help inform ACS' policy work.

ACS INVESTMENT TRACKER

Regular quarterly survey of over 1,200 independent and symbol retailers which is combined with responses from multiple businesses representing over 3,000 stores.

ACS LOCAL SHOP REPORT

Annual survey of over 2,400 independent, symbol and forecourt retailers combined with responses from multiple businesses representing 7,669 stores. The Local Shop Report also draws on data from HIM, IGD, Nielsen and William Reed.

BESPOKE POLLING ON POLICY ISSUES

ACS conducts bespoke polling of its members on a range of policy issues, from crime and responsible retailing to low pay and taxation. This polling is conducted with retailers from all areas of the convenience sector.