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Response to the consultation for a charge on single use carrier bags in Northern Ireland

Marks & Spencer is one of the UK's leading retailers of high quality clothing, food and homeware with 10 stores in Northern Ireland.

In 2007, we launched our Plan A sustainability programme which included commitments to reduce the number of single use carrier bags provided to our customers. After a series of trials, in May 2008 we introduced a 5p carrier bag charge in the food sections of all our UK stores, including Northern Ireland. Profits from sales of the bags have been donated to environmental charities including Groundwork to fund local parks, gardens and play areas and more recently as part of our Forever Fish campaign to support marine conservation. We also offer a range of re-usable alternatives starting in price from 10p for a bag-for-life.

This combination of a modest charge, transparent use of profits for community benefit and provision of affordable alternatives has been successful in reducing our single use food carrier bags by 80%. Three years on, the 5p charge is still sufficient to maintain this 80% reduction.

Carrier bags have become an iconic representation of wastefulness, however, their impact in terms of waste, carbon emissions and litter is modest (see Environment Agency 2011 carrier bag life cycle review).

Whilst we believe that it is right to help customers reduce their usage of carrier bags, the measures taken must be kept proportionate to the relatively low level of environmental benefits which can be derived.

We have provided a detailed response to your questions below but in summary:

- **We support the Northern Ireland Assembly's proposal to introduce a single use carrier bag charge at a level which is sufficient to encourage re-use but avoids contributing to inflation.**
- **We are very disappointed that the current proposals do not allow for the money raised to be donated to community projects.**
- **We are concerned that the scope and level of charge will be formulated by the need to raise £4m for Government funding rather than being determined by an appropriate level to encourage customers to re-use bags.**

- **We do not believe that there is any useful purpose served by retailers publishing records of carrier bag data under the proposals as all data will be held by Government. (Publishing data only serves a purpose if retailers are allowed to donate proceeds to community project as proposed in Wales).**
- **We believe that the work of the Welsh Assembly Government and retailers to develop sensible definitions of a re-usable bag and the necessary exemptions should also be applied in Northern Ireland.**

Our detailed responses to the questions posed in the consultation are detailed below:

What are your views on the Department's proposals above?

We support the Northern Ireland Assembly's proposal to introduce a single use carrier bag charge to all types and materials of single use carrier bags (with sensible exemptions, see below) at a level which is sufficient to encourage re-use but does not contribute to inflation.

However, we believe that the scope and level of charging should be designed to reduce the number of carrier bags used rather than as a form of government revenue raising.

What do you think is an appropriate minimum charge for single use carrier bags – and why

We believe we have demonstrated that 5p is an effective level of charge to reduce carrier bag usage by 80% and to subsequently maintain this reduction. Whilst a higher charge is likely to reduce usage further we believe that the additional reduction will be marginal making the higher costs to customers disproportionate to the benefit. A charge higher than 5p would also be more expensive than some of the re-usable bags available on the UK market.

Are there any types of carrier bags which should be exempt from the charge? If so, on what grounds?

Yes. We would encourage the Northern Ireland Assembly to adopt the sensible exemptions identified by the Welsh Assembly Government including very small bags, bags which form the primary packaging for food products and bags likely to be contaminated by horticultural products. In addition, wrapping materials which aren't carrier bags such as suit carriers should also be exempted.

We support the Northern Ireland Assembly proposal to apply the charge to all types of material. A charge on plastic bags as originally proposed would have resulted in the greater use of paper bags with significantly higher environmental impacts as illustrated by the Environment Agency's research published in February of this year.

Do you think that multiple use carrier bags should be included in any levy?

No. The purpose of the charge is to encourage re-use, a principle that in our experience most customers will support. Applying the charge to re-usable bags will confuse the message to customers.

What information should sellers have to keep in relation to the carrier bag charge?

The Welsh Assembly Government has developed detailed data requirements to maintain transparency and public trust in how net proceeds from the charge are donated to good causes. We believe that this approach will have wider public support than the Northern Ireland Assembly proposals.

However, if the charge is paid directly to Government as proposed in Northern Ireland, data requirements become minimal with only the number of bags sold and resultant proceeds required.

Should sellers have to publish their records?

No. If proceeds are not voluntarily donated to good causes as is planned in Wales, we do not believe that published records would serve any purpose. All data will be available from the Government agency responsible for collecting the charge.

Have you any views on which organisation should administer the carrier bag charging scheme in Northern Ireland?

Yes. Collection of the charge must be as efficient as possible involving only one agency in one transaction a year. We suggest that the Department of the Environment should collect charges annually.

Yours faithfully

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