



ACS Submission: Environment (Wales) Bill

1. ACS (the Association of Convenience Stores) welcomes the opportunity to respond to the National Assembly for Wales' consultation on the general principles of the Environment (Wales) Bill. ACS is a trade association, which represents over 33,500 stores across the UK, including Spar UK, Nisa Retail, Costcutter and thousands of independent stores.

Carrier Bags

2. ACS opposes the proposal in the Environment (Wales) Bill to extend the carrier bag charging scheme to include bags for life and other bags. The current scheme, which only required charging for single use bags, has been extremely successful in changing consumer habits and reducing bag use. There is no evidence to suggest that bag for life are being used as single use carrier bags. Extending the scheme to bags for life and other bags would also place additional reporting burdens on retailers.
3. ACS opposes the need for an obligation on retailers to pass on the net income from the bag charging scheme to charitable causes. Retailers have engaged positively with the carrier bag charging scheme and have passed on the income to good causes. There is no evidence to suggest that retailers are using the bag charging scheme as a revenue raising tool. ACS' Voice of Local Shops survey of independent retailers shows that Welsh retailers contribute significantly to charities and local communities with 85% undertaking work in their communities.

Waste Disposal

4. ACS believes that the collection and disposal of waste should remain a voluntary commitment for retailers. By imposing a requirement for separation of waste, this will place additional burdens on retailers such as training and implementation costs.
5. In this submission, ACS will be responding to questions under part 3 (Carrier Bags) and part 4 (Collection and Disposal of Waste) from the consultation document. Please see our detailed response below.

Part 3: Carrier Bags

Do you agree with the proposal that Welsh Ministers should have powers to raise a charge on all types of carrier bags not only single use bags?

Do you agree with the proposal that Welsh Ministers should have powers to raise different charges on different types of bags on?

6. ACS opposes the proposals that would allow Welsh Ministers the power to raise a charge on all types of carrier bags. The existing scheme is working well to change consumer habits, moving them away from single use carrier bags towards reusable bags. According to ACS' UK-wide member survey of carrier bag use, 56% of the respondents representing more than 2300 stores, sell bags for life, though in relatively low numbers.
7. All members who responded to the survey answered that they charge at least 10 pence for bags for life, and typically ranged between 10-20 pence; this would suggest that the price is sufficiently high so as to avoid customers substituting single-use bags to bags for life. This would also indicate that retailers are not dispensing bags for life for free, apart from when customers are replacing their worn out bag for life.
8. Given the higher charge that retailers already operate for bags for life in their stores and consumers' growing inclination toward reusing bags for life, it would appear that there is no need for other kinds of bags to be included within the scope of the levy. Instead, efforts should be made to ensure that consumers are continuing the trend of reusing bags for life.
9. Some retailers also offer at cost, other kinds of reusable bags to their customers, including hessian bags and cotton tote bags. It would be confusing to both retailers and consumers alike if certain bags (such as bags for life) were included in the levy and others were not included, or then included at a later stage. It is therefore preferable to continue with the current system.
10. By including more bags within the bag charging scheme there would also be additional burdens on retailers to record and report more information on the bags and what they are using the proceeds for. We urge the Welsh Government to carefully consider the additional burden this will place on retailers when the existing scheme is already working well.
11. To conclude, ACS supports Option D stated in the impact assessment "amend the existing powers in the Climate Change Act 2008 so that the regulations may require sellers to apply the net proceeds of the charge to any good cause but do

not exercise the powers to amend the Single Use Carrier Bag (Wales) Regulations 2010”.

Do you agree that the profits from the sale of carrier bags should be directed to all charitable causes rather than just environmental ones?

12. ACS welcomes the proposal to allow the profits from the sale of carrier bags to be directed to all charitable causes rather than solely on environmental causes. However, we oppose the need for a duty and sanctions to be places on retailers. Retailers across Wales have supported the carrier bag charging scheme in good faith and the opportunity to pass the net income from the charge is a positive outcome of the charging scheme.

13. ACS polling has shown that shops in Wales are most likely to raise money for charity, with 90% stating that they give money to good causes, in comparison with an average of 76% across Britain. Arguably, there is a strong correlation between this high percentage and the introduction of the carrier bag levy in 2011.

14. These results show that there is already a high compliance in Wales among convenience store retails, despite the fact that a large number do not have to report back their proceeds to the Welsh Government as they have ten or fewer members of staff working in their stores. This would therefore suggest that the Welsh Government does not need to intervene further to encourage retailers to donate their proceeds to good causes.

Part 4: Collection and Disposal of Waste

For your views on whether the Welsh Ministers need further powers to require that certain types of waste are collected, treated and transported separately?

Do you agree that non-domestic premises should be required to put their waste out for collection in line with any separation requirements set out by the Welsh Government?

What will the impacts of these waste proposals be for you or your organisation?

15. ACS believes that Welsh Ministers do not need further powers to require that certain types of waste are collected separately. Many retailers already have recycling procedures in place in store to separate out waste. Imposing a requirement on businesses to separate waste would place significant burdens on retailers and cause operational disruption in store.

16. For convenience stores this would be particularly burdensome because the small format nature of their stores means there is little space available to sort and separate out waste. The broadly accepted definition of a convenience store is one that is below 3,000 square feet. Independent retailers in general have the smallest stores, with 49%¹ of independent retailers trading out of stores below 1000 square feet. For these retailers it will be challenging to find space in store to manage the separation of waste.
17. There would also be significant costs incurred by retailers to invest and set up a system in store to manage waste safely. This would also require significant staff hours and the training of staff. For retailers that already operate a separation scheme for waste, they would have review existing procedures and incur costs changing these process to match the Government scheme. For retailers that operate a national level, it would be beneficial to have consistency with existing UK measures.
18. ACS supports Option 1 stated in the impact assessment “do nothing”. We however believe that businesses should be incentivised by the Welsh Government to implement their own recycling schemes on a voluntary basis.

For further information please contact Julie Byers, ACS Public Affairs Assistant via email Julie.Byers@acs.org.uk or 01252 533008.

¹ ACS Local Shop Report