



Consultation on proposed changes to the Carrier Bag Levy

Summary of consultation responses and the government response

September 2021

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Department of
**Agriculture, Environment
and Rural Affairs**

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**INVESTORS
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Introduction

On 1 June 2021, the Department of Agriculture, Environment and Rural Affairs (DAERA) launched an eight week public consultation on proposed changes to the Carrier Bag Levy across Northern Ireland (NI). This consultation was primarily launched due to increasing concern that the existing legislation, introduced in 2013 and updated in 2015, was no longer delivering its policy objective to contribute to sustainable waste management also reducing overall carrier bag usage.

Scope of the consultation

To coincide with the consultation launch, the Levy team proactively contacted 2958 stakeholders, including all retailers currently registered on the Carrier Bag Levy database and a press release was issued on 1 June 2021, encouraging contributions. Further media, again encouraging participation, issued on 1 July 2021, supported by 'Keep Northern Ireland Beautiful' and via DAERA social media channels also using My NI and the NI Business Info webpage, public participation was again encouraged. The consultation closed on 27 July 2021.

Responses received

The Department welcomes the 531 responses received from a broad range of stakeholders (both retailers, representative bodies and members of the public) and replies have now been collated, cross-referenced, summarised and analysed. Of these 531 responses, 97.74% came via the online platform Citizen Space, 2.07% were email and 0.18% were received by post; a breakdown of responses is included below, including departmental responses.

The Department intends to engage further with stakeholders and the public during the development and implementation of any legislative changes which may now be required. A focused and detailed communication plan will also be delivered to ensure key messages are disseminated.



List of consultation questions

Question 1	Which of the following best describes yourself or your organisation for this consultation?
Question 2	What age bracket are you in?
Question 3	Do you agree or disagree that the carrier bag levy in Northern Ireland has been successful in reducing the number of carrier bags in circulation?
Question 4	Since the levy was introduced in 2013, have you become more aware of the environmental benefits of reducing the use of carrier bags?
Question 5	What do you think has been the main benefit of the Carrier Bag Levy so far to the Northern Ireland environment?
Question 6	How often do you take a bag with you when you go shopping?
Question 7	Does the current levy charge of 5 pence discourage you from purchasing a bag?
Question 8	If the Levy is increased to more than 5 pence would it encourage you to bring your own bag?
Question 9	Do you agree or disagree that increasing the levy to more than 5 pence will result in you purchasing fewer bags?
Question 10	Do you agree or disagree that the regulations should be simplified to exempt fewer bags?
Question 11	Do you agree or disagree that the regulations should be simplified by introducing an exemption for bag A, which would replace the current exemption for bag B and bag C as defined below: Bag A - Any material, max dimensions 125mm x 155mm, gusset 50mm, no handle Bag B - plastic, no gusset or handle, max dimensions 125mm x 125mm Bag C - paper, no handle, max dimensions 80mm (wide) x 50mm (gusset width) x 155mm (height).
Question 12	Do you support the proposal to remove the exemption for bags made wholly from paper, dimensions of 175mm x 260mm, with no gusset and no handle?
Question 13	Do you support the proposal to remove the existing exemption for carrier bags supplied within restricted areas at airports (with the exception of items sealed inside a security bag when you buy them with the receipt for the items in the security bag and visible) and also all bags on ships trains, aircraft, coaches or buses?
Question 14	Do you agree or disagree that the levy should be applicable to all carrier bags regardless of price?
Question 15	Do you agree or disagree that all proceeds generated from the levy should be used towards supporting environmental projects in Northern Ireland?
Question 16	Is there anything else you would like to tell us relating to the proposals set out in this consultation?



Questions & responses

Questions 1 & 2

Question 1

Which of the following best describes yourself or your organisation for this consultation?

Of the responses received: members of the public (63%), large retailer (3%), small/medium retailer (28%), public body (2%), other (4%).

Government response:

DAERA is encouraged by the wide and broad cross section of citizens who responded to the consultation also the high levels of engagement shown by members of the public. This confirms the great interest and strong levels of commitment for this key environmental initiative across NI. While only 4% of respondents describe themselves as 'other', these 4% are known to represent a significant number of key retailers, small businesses, representative bodies and charity organisations across the wider NI retail sector.

Question 2

What age bracket are you in?

Of the responses received: under 18 (under 1%), 19-30 (8%), 31-40 (20%), 41-50 (28%), 51-60 (25%), over 60 (19%).

Government response:

DAERA is encouraged with the response representation from all age groups and recognises how it was particularly beneficial to use the Citizen Space platform to access and engage with a broad cross section of the NI public.



Questions 3 & 4

Question 3

Do you agree or disagree that the carrier bag levy in Northern Ireland has been successful in reducing the number of carrier bags in circulation?

Of the responses received, 83% either strongly agreed or agreed that the levy had been successful in reducing the number of carrier bags in circulation. Only 1% strongly disagreed. Of the others, 9% neither agreed nor disagreed with 7% disagreeing.

Government response:

Official statistics in the eighth year of the levy confirmed 56.2 million carrier bags were known to have been circulated during 2020/21, a reduction of 81.3% from the baseline figure of 300 million in 2012. These statistics show some levels of success in reducing unnecessary bag usage which has been recognised by the majority of respondents.

Question 4

Since the levy was introduced in 2013, have you become more aware of the environmental benefits of reducing the use of carrier bags?

Of the responses received, 88% answered yes to this question and 12% answered no.

Government response:

The carrier bag levy was primarily introduced as a waste management and wider environmental protection initiative. An overwhelming percentage of respondents have confirmed they are more aware of the environmental benefits of reducing the use of carrier bags. DAERA is encouraged by this response and proposes to consider how to further highlight and educate the NI public on environmental initiatives and how proceeds of the levy benefit the wider environmental sector.



Questions 5

Question 5

What do you think has been the main benefit of the Carrier Bag Levy so far to the Northern Ireland environment?

There were 5 options to this question, the last option being a free text box for any response. Of the responses received, the benefits highlighted were - less waste and litter (49%), educating citizens to be more environmentally friendly (32%), less pollution and emissions (8%), keeping the countryside beautiful (4%) and 7% input to the free text box.

101 responses provided further comment, the main responses referring to the following:

24% - the levy has had positive environmental benefits, 17% - there has been less litter/waste, 16% - not enough bag reuse / an increase to the levy / extensions to what a levy is applied to is required, 9% - a ban on various bags including plastics, 8% little impact or benefits, 7% - information and education is required, 7% - the levy being a tax and benefitting retailers and the Government.

Specific quotes include:

“Less waste and litter and all the consequences of this.”

“The cost of bags remains cheap and not enough of an incentive to cause people to reuse.”

“Less visible waste is the most noticeable factor ... it started a debate about environmental issues...”

“...people continue to pay the far too low price for bags...the number of plastic bags littering the countryside shows how little many people care.”

Government response:

DAERA is encouraged that since the introduction of the levy, it has already helped deliver a NI which is both cleaner and greener and a better place to live and do business. While awareness seems to be high of some of the benefits that the levy has delivered, in going forward the Department intends to more actively educate our citizens and promote the associated benefits.



Questions 6 & 7

Question 6

How often do you take a bag with you when you go shopping?

Of the responses received, 70% confirmed they always take a bag when they go shopping, 2% never take a bag, with 28% of those who replied confirming they sometimes take a bag when they go shopping.

Government response:

While the level of customer awareness around bringing bags when you go shopping appears to be high, it is clear we can and must do more. Despite a 70% response from those who always take a bag to go shopping, the carrier bag statistical returns for 2020/21 show overall known bag distribution of 56.2 million carrier bags priced at below 20 pence. The numbers of bags priced at 20 pence and above is currently unknown. 56.2 million bags (known numbers), distributed among the average population in 2020 of 1.8 million people equates to 31 bags per person within one year. Given these figures, the Department are concerned that bags are not being reused sufficiently with adverse environmental consequences.

Question 7

Does the current levy charge of 5 pence discourage you from purchasing a bag?

51% answered yes and 49% answered no.

Government response:

With 49% of respondents saying that a 5 pence levy charge does not discourage them from purchasing a bag, this shows a level of complacency is now evident surrounding both the purchase and use of bags. DAERA proposes to increase the levy charge to further encourage the reuse of bags, re-educate the public and retail sectors around supply, reuse and purchase of new bags.



Questions 8 & 9

Question 8

If the Levy is increased to more than 5 pence would it encourage you to bring your own bag?

Of the responses received, 75% answered yes, while 25% answered no.

Government response:

Three quarters of respondents agreed that an increase in the levy would encourage them to bring their own bag. While the consequence of an increase in the levy ultimately will drive usage figures down, the main message of the levy remains 'bring your own bag' so this response is encouraging.

Question 9

Do you agree or disagree that increasing the levy to more than 5 pence will result in you purchasing fewer bags?

The number of responders who either strongly agree or agree was 65%, with 14% neither agreeing nor disagreeing, 11% disagreeing and 10% strongly disagreeing.

Government response:

"Bring your own bag" is a fundamental message and one of the key policy drivers of the levy overall is to encourage reuse of bags already purchased. With 65% of respondents either strongly agreeing or agreeing that increasing the levy to more than 5 pence would result in them purchasing fewer bags, responses indicate support for the overall decision to increase the levy charge.



Questions 10 & 11

Question 10

Do you agree or disagree that the regulations should be simplified to exempt fewer bags?

64% of the responses received strongly agreed or agreed, 25% neither agreed nor disagreed and 11% disagreed or strongly disagreed.

Government response:

DAERA strives to produce evidence based and future proofed policy. Generally, members of the public, retailers and representative bodies agreed that fewer exemptions would be welcomed as anything to simplify policy and its implementation is good. However, some retailers and sectoral bodies showed some concern that existing exemptions would be removed, for example for food hygiene reasons. The Department has carefully considered the current exemptions, some of which will remain and some of which will be removed/ replaced. The removal of an exemption on a 20 pence threshold was widely accepted by all. The Department will bring forward simplified legislation.

Question 11

Do you agree or disagree that the regulations should be simplified by introducing an exemption for bag A, which would replace the current exemption for bag B and bag C as defined below: Bag A - Any material, max dimensions 125mm x 155mm, gusset 50mm, no handle Bag B - plastic, no gusset or handle, max dimensions 125mm x 125mm Bag C - paper, no handle, max dimensions 80mm (wide) x 50mm (gusset width) x 155mm (height).

Of the responses received 15% disagreed, 44% neither agreed nor disagreed and 41% either strongly agreed or agreed.

Government response:

This supports the Department's intention to simplify regulations. Simplifying the exemptions to include only one bag, sized at 125mm x 155mm x 50mm gusset with no handle, of any material, will allow for some flexibility to small retailers and those providing smaller items which require a bag. Previously there were 2 bags providing this function, one of plastic only and one of paper only, with restrictive measurements. The Department proposes to remove 2 existing exemptions and replace with 1 exemption.



Questions 12 & 13

Question 12

Do you support the proposal to remove the exemption for bags made wholly from paper, dimensions of 175mm x 260mm, with no gusset and no handle?

The breakdown of replies was 54% yes and 46% no.

Government response:

The responses received supports the Department's intention to simplify the existing regulations. This bag was mainly used for greeting cards and a majority (54%) of respondents have agreed with removing the exemption. The Department agrees that simplification is required and proposes to remove this exemption.

Question 13

Do you support the proposal to remove the existing exemption for carrier bags supplied within restricted areas at airports (with the exception of items sealed inside a security bag when you buy them with the receipt for the items in the security bag and visible) and also all bags on ships trains, aircraft, coaches or buses?

69% of responders answered yes and 31% answered no.

Government response:

Over one third of respondents saw no reason for a specific exemption in airports, on ships, trains, aircraft, coaches or buses. The Department proposes to remove this exemption.



Questions 14 & 15

Question 14

Do you agree or disagree that the levy should be applicable to all carrier bags regardless of price?

70% of responders either agreed or strongly agreed, 11% neither agreed nor disagreed and 19% disagreed or strongly disagreed.

Government response:

The regulations in NI currently apply to all carrier bags, regardless of material, with a price of under 20 pence. 70% of respondents either strongly agree or agree that there should be a levy charge regardless of the price of the bag. In response, the Department proposes to amend the current exemption which states that bags priced at 20 pence and above are not included in the levy. Most of the representative bodies and large retailers who responded also agreed that the exemption for bags priced at 20 pence and above should be removed or increased. The Department proposes to increase this threshold to £5.

Question 15

Do you agree or disagree that all proceeds generated from the levy should be used towards supporting environmental projects in Northern Ireland?

92% strongly agree or agree, with 5% neither agreeing nor disagreeing and 3% strongly disagreeing.

Government response:

Some respondents, including sectoral bodies, would like more clarity on how funds are dispersed, education for retailers and the public, and some would like a say in how funds are allocated. The Department will work to further educate the NI public on any new regulations and will continue to support environmental projects in NI from levy proceeds. Given the overwhelming response here, with 92% either strongly agreeing or agreeing, the Department intends to continue to allocate funds to support environmental projects and the wider environmental sector across NI.



Question 16

Question 16

Is there anything else you would like to tell us relating to the proposals set out in this consultation?

Of the 531 total responses to the consultation, 46% provided further comment with the main responses summarised below along with a departmental response:

Support for proposals:

22% of comments made specifically supported an increase in the levy, with some suggesting an increase including some of the retail sectoral representative bodies, who also suggested parity within the other UK jurisdictions.

To quote two examples:

“I feel the levy for single use carrier bags has to be raised considerably to encourage everyone to stop using them.”

“The levy should be brought up to £1. That way people would refuse a bag which is after all the main aim...”

Government response:

DAERA agrees that an increase in the levy is now necessary in NI to maximise environmental impact and mitigate against the existing harmful throw away culture for bags with the subsequent environmental consequences. The devolved UK administrations have their own legislation and policy in respect of carrier bags and some have already increased to 10 pence; it should be recognised that DAERA already have the most comprehensive legislation on carrier bags with the levy applying to all bags and not just plastic. As such, it is the Department’s proposal to increase the levy to 25 pence, increase the threshold to £5 and implement a 5 year review period to consider overall levy policy.

Suggestions for change:

Overall, 12% of comments suggested a ban on various bags (primarily plastic bags).

To quote two examples:

“Why not ban all plastic bags? People would soon learn to bring their own!”

“Single use bags whether plastic or paper need to be done away with.”



Government response:

While some jurisdictions have introduced a ban on all single use plastics, DAERA does not intend to ban bags but proposes to increase the levy itself so as to re-educate and change customer behaviour and further reduce the harmful environmental impact caused by the number of heavy duty bags currently flooding the market.

How funds are used:

Overall, 11% of comments included queries on how funds are currently used or suggestions for use of funds going forward.

To quote two examples:

“It would be good to see the projects that benefit from the levy funds more widely publicised as this would show the public how the funds raised are spent.”

“Environment spending from the Levy should be used to support and grow the Circular Economy and with emphasis on Reuse and Repair activities.”

Government response:

DAERA is the only UK jurisdiction where all the funds from the levy are used for environmental purposes and citizens can apply for support through the NI Environment Fund. These current arrangements secure delivery of strategic environmental outcomes through the provision of grant aid and partnership working with not-for-profit organisations and councils. Moving forward, DAERA will consider how best to keep retailers and members of the public informed on the positive outcomes that proceeds of the levy are delivering.

Materials:

13% of responders support an exemption on a range of bags including paper, compostable and biodegradable.

To quote two examples:

“I would like to see more use of paper bags, recycled paper bags etc.”

“Our home uses a lot of compost bags for food waste. I would like more shopping bags to be use able as compost bags also.”



Government response:

All bags, regardless of what they are primarily made of, leave a carbon footprint before arriving with retailers, some more so than others. The levy was introduced to reduce the number of unnecessary bags in circulation. DAERA encourages members of the public to reuse carrier bags, with the key message being 'bring your own bag' and "reuse your bag as often as you can". DAERA advises that the legislation in NI is the most extensive in the UK and unlike other devolved administrations, the levy is applicable to all bags and not just plastic. While DAERA supports the use of other materials for carrier bags, the often harmful environmental impact of all carrier bags should be recognised.

Education needed:

Overall, 7% of responders related to education of retailers, consumers, or both.

To quote two examples:

"Greater attention needs paying to education and awareness training ... of the public on environmental issues ... to ensure complacency to any increased levy does not occur again."

"Education is important ... we need to recycle more."

Government response:

DAERA will consider the best ways to promote any new legislative changes to both members of the public and the overall NI retail sector. The Department recognises a robust communication strategy informing of all changes to the levy and its administration should be developed and rolled out to all stakeholders in advance of implementation.

Some representative body comments:

Some representative bodies raised concerns that an increase in the levy to 20p or 25p would have a greater impact on low income families and also about the timing of any increase during the current pandemic.

To quote four examples:

"We believe such an increase would disproportionately impact on low-income families at time of huge economic turmoil with Covid-19. Therefore, we believe the current 5p charge should be increased to a more realistic figure of 10p in line with what is being proposed in England and Scotland".



“We believe the proposed increase to 20p or 25p per carrier bag is too high and in-danger of creating unintended consequences.”

“... give careful consideration to the regulatory timeframe for the introduction of the changes to the carrier bag charge, especially as the country is still facing waves of COVID-19 and retailers are still dealing with unparalleled uncertainty and challenges caused by the pandemic and Brexit.”

“The uncertainty around shopping trends, high street trading and market structure post COVID-19, combined with further uncertainties around the types of bags and pricing points in the retail sector, are genuine risks which would further exacerbate the costs for household bills in NI.”

Government response:

This engagement by representative bodies is welcomed by the Department. The Department recognises the impact that COVID has had on the economy in NI which was why temporary legislation on home delivery of groceries was introduced from April to September 2020. The Department delayed going out to consultation in light of COVID and do not intend to introduce new legislation before April 2022, when it is expected that the retail sector are in a more settled period. The proposed increase in the levy is intended to further alter consumer behaviours and encourage a society which rejects the throwaway culture and reduce overall bag usage. The main message remains ‘bring your own bag’ and ‘reuse your bag as often as possible’. By following these key messages, consumers can avoid paying any levy and will have a positive impact on the NI environment.

Other comments received include:

“When I go to do a shop I remember to bring bags but when I go in for a few things I forget my bags. Maybe by encouraging other materials to be used would help.”

“Can polystyrene takeaway food containers ... indeed any plastic containing food container please also carry a levy ... survival of our species requires long term responsible thinking.”

“Need to consider double wrapping and how to discourage ... portions of chips or fish suppers placed on polystyrene trays then wrapped in paper then placed in plastic carrier bag.”

“Exemptions for bags containing fast food should be removed ... Removing exemptions for all bags used by fast food outlets, including paper bags, would ensure those purchasing such items were at least contributing to environmental projects...”



“People have become accustomed to a charge. 5p is not enough. All bags have an environmental cost and a charge should apply to all bags.”

“A levy on plastic bottles is required ... or a return reward for plastic bottles.”

“Needs to be more enforcement for those who aren’t charging the levy.”

“Simplify by applying levy to all bags issued by shops or authorities...”

“I would support a levy on polystyrene or takeaway containers ... a payment at recycling centres for plastic bottle deposits - and a levy on plastic bottles - might reduce this particular form of roadside litter.”

“Also important to work with producers and supermarkets to develop alternatives to plastic packaging, e.g. refill points for wide range of foods.”

“Supermarkets and other food retailers should be levied for providing plastic bags to weigh items in (e.g. fruit).”

“Paper bags cannot be used as a replacement single use bag.”

Government response:

DAERA are currently gathering information, engaging with key stakeholders and considering best practice so as to develop a range of other policies and interventions intended to promote and deliver a more sustainable environment. This includes supporting behavioural change initiatives, targeting a reduction of takeaway cups and food containers and extended producer responsibility on packaging. This review of the levy placed on carrier bags is part of the Department’s ongoing commitment to sustainability within a living, working, active landscape, which is valued by everyone.



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