

# Lightweight plastic carrier bags

## POSITION PAPER ON EP AMENDMENTS TO DIRECTIVE 94/62/EC

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**Contact:** Mohamed Temsamani, +32 2 737 05 83, [temsamani@eurocommerce.be](mailto:temsamani@eurocommerce.be)

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Carrier bags play an important role for commerce. The sector uses them because they serve a very specific purpose, while also providing many practical advantages. It allows millions of consumers across Europe to transport their goods from the stores to their home, in the most efficient manner with an impressive ratio of 5g/15kg on average (weight of the carrier bag/weight of transported goods). These bags protect products from damage and filth, do not take space, while also proving to be extremely light and resistant. They are often reused for new purchases, and at home for dustbins and other domestic purposes.

The commerce sector is aware of the impact of lightweight plastic carrier bags and other plastic waste, when discarded at the end of life, or even more so, if littered into the environment. Therefore, commerce companies across Europe have been taking actions for a long time to reduce their negative impact. They optimize their supply chains, re-design products to reduce packaging waste and analyse their entire operations to identify environmental hot spots. Many companies, or national trade associations, also engage in voluntary initiatives<sup>1</sup> regarding their use of carrier bags. Over the years it was possible to significantly reduce the amounts of plastic bags used on a daily basis by consumers. In France for example, the number of plastic disposable carrier bags have dropped from 10.5 billion in 2002 to 800 million last year, due to voluntary initiatives promoting reusable bags.

Innovation has led to plastic bags being thinner and lighter when disposable, or on the contrary, thicker and more resistant when intended to be reused. They can now also be made from recycled materials, thus ensuring that less resources are used overall in the production and consumption phases. **If action at the EU-level is deemed necessary, the success of these voluntary actions should be recognised and taken into account.**

Plastic bags only represent an extremely small portion of the plastic waste generated in the EU. According to Eurostat, municipal waste in the EU was 251 megatonnes in 2008, only

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<sup>1</sup> See Annex I

0.7% of which were plastic carrier bags<sup>2</sup>. In order to appropriately impact waste management streams, commerce considers that a more comprehensive approach has to be found, and the focus placed on **plastic waste in general**. The best approach would therefore be to address the issue in a more inclusive manner in the upcoming **review of the packaging and packaging waste legislation**.

This would enable the European Parliament not to rush through the issue, and the European Commission to properly assess the impacts of its proposal. This is particularly important as some of the conclusions of the [BIOIS Impact Assessment](#) have been seriously challenged by the plastics converters industry<sup>3</sup>.

In order to dispose of the existing plastic waste, commerce considers that the **focus should be placed on the recycling of plastic materials. Ensuring that existing collection rates for waste are reached in European Member States is a priority**. The need for a correct implementation of the EU waste legislation is fundamental, as it would ensure that the necessary infrastructures are available, which would in turn help to achieve high recycling rates.

This, however, can prove to be particularly difficult when, as it is currently the case, the infrastructure is lacking at the municipal/local level in certain Member States. There are no easy solutions to a complex problem. The negative environmental effects will only be tackled with a holistic approach which addresses plastic and plastic waste in the environment. Such an approach should include plastic bags, without focusing on them. Given that this proposal does not provide the right framework to deal with environmental challenges posed by plastics waste, **commerce does not consider it appropriate to legislate on the specific issue of plastic bags**.

As regards ongoing discussions on possible amendments to Directive 94/62/EC on packaging and packaging waste, we ask that our specific concerns be taken into account:

#### **1. We ask for a recognition of already existing efforts and initiatives:**

**It is completely unrealistic to ask for an 80% reduction target in the consumption of lightweight plastic carrier bags as compared to the average consumption in the EU in 2010** (as suggested in the Rapporteur's report in Amendment 23).

A significant reduction in the use of plastic bags is possible but, not in the proportions suggested by the EP. The EU average in 2010 is 198 bags per European. This means that a reduction of 80% would see the consumption of plastic carrier bags drop to **40 bags per person/per year/per country**.

Reducing the consumption to 80% of the EU average (ie. 40 bags per person/per year) is different to achieving a reduction of 80% in absolute terms, which is something numerous Member States have already achieved. For this reason, we consider that:

- ⇒ The EP proposal is simply impossible to implement in the allotted time (2 years) for countries where the national average is currently above 400 bags per person (see

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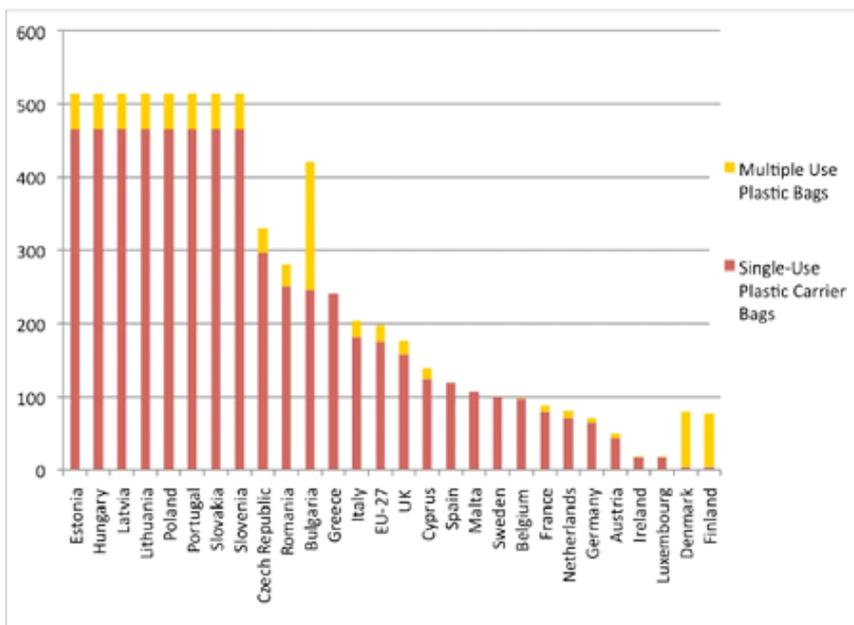
<sup>2</sup> [http://ec.europa.eu/environment/waste/packaging/pdf/report\\_options.pdf](http://ec.europa.eu/environment/waste/packaging/pdf/report_options.pdf) p.12

<sup>3</sup> See EuPC position on the European Commission's Impact Assessment for a Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Directive 94/62/EC on packaging and packaging waste to reduce the consumption of lightweight plastic carrier bags (BIOIS Impact Assessment)

Figure 1). It cannot possibly be expected for Member States that have not yet taken actions to reach the same results than Member States that have lead the way on the issue. Commerce asks for a pragmatic and realistic approach to be considered instead.

- ⇒ It is also impossible to meet this objective of 40 bags per European/per year per country for Member States that have already taken actions and have an average consumption of plastic bags below the EU average (198 bags). Any measures taken, or reduction targets set, should consider that successful initiatives have already been carried out. Carrier bags do serve a specific purpose, and reduction of the consumption below a certain point is unrealistic, counter-productive and ultimately detrimental to consumers.

**Figure 1:** Single and multiple use plastic carrier bags used per person in EU Member States and EU-27 average, 2010 or latest available data<sup>4</sup>:



## 2. We support the requests for certain exemptions:

Some plastic bags are used as packaging for fresh, non-packaged food purchases (fruits, vegetables, fish, meat, bakery products and pastries, etc), or hot food to go, for reasons of hygiene and food safety. They fulfil an important role as it also serves the purpose of preventing food wastage, since it enables consumers to purchase the exact amount required rather than fixed prepackaged quantities. Because of the specific characteristics and benefits that these bags provide (food protection, resistance of the bag, water-proof, visual control at checkout) there is currently no alternative to their use.

- ⇒ The commerce sector supports the exclusion of the scope for bags used for these products as the bags' primary purpose is not to "carry" but rather to "protect" (as suggested in Amendments 76, 88). However, it is important to point out that not all bags used for fresh products are below 10 microns (see definition of 'very lightweight plastic carrier bags' in Amendment 97). For hygiene, technical and effectiveness reasons, the thickness of these particular type of bags can vary between 8 and 35

<sup>4</sup> European Commission Impact Assessment, Figure 1 p.10

- microns. If no alternatives exist, we therefore ask, for an exemption of the scope for these bags, regardless of their thickness.
- ⇒ Reusable plastic bags should also be exempted as their environmental positive impact has been recognized, as demonstrated by the French Environment Agency ADEME<sup>5</sup>. Their effectiveness on the consumers' behavior in prompting reuse has also been demonstrated (TNS SOFRES study<sup>6</sup>).

### **3. We reject marketing restrictions such as bans:**

Member States should be encouraged to take actions through non-legislative and non-binding recommendations which may include the use of voluntary reduction schemes. This preferred option would allow each Member State to adapt their approach to their national situation without placing significant burdens on commerce, and the economy.

As a general rule, EuroCommerce would like to underline the need to respect the principle of fiscal neutrality. It is important to avoid new measures adding on to already existing ones which result in additional costs for businesses and limit the purchasing power of consumers. Different approaches work in different Member States, and commerce considers that it should be up to the Member States, together with the commerce sector, to decide on how to address the environmental issue posed by plastic bags.

Plastic bags should not be regulated at EU level due to the underlying differences in the national approaches, as well as varying consumer behaviors and expectations.

- ⇒ EuroCommerce is opposed to banning lightweight carrier bags, whatever the material from which they are made simply because bans would prove to be completely ineffective in terms of reducing the environmental impact of carrier bags. The issues identified by the commerce sector as the most fundamental, (ie. lack of infrastructure and implementation of waste legislation, lack of awareness to consumers, absence of economies of scale for recycled materials) would simply not be addressed by the introduction of bans. Furthermore, any bans or too stringent measures on single use carrier bags would lead to more packaging on products (in order to help consumers carry their goods), which would be detrimental to the environment. For these reasons, commerce recommends to focus on measures that are incentive-based, rather than punitive.

### **4. We ask that before any measures on plastic bags are taken, the impact of alternatives be tested:**

As it was demonstrated in a report from the UK Environment Agency<sup>7</sup>, paper carrier bags including the ones produced from renewable sources (biodegradable, compostable, and/or recyclable) require significantly more energy to manufacture and transport than plastic bags.

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<sup>5</sup> See PwC-Ecobilian studies and critical review by ADEME, "sac de caisse et protection de l'environnement", note de synthèse actualisée, 2005

<sup>6</sup> See TNS SOFRES "Etude sur les pratiques des sacs plastiques réutilisables" Résultats définitifs, 2005.

<sup>7</sup> [http://www.biodeg.org/files/uploaded/Carrier\\_Bags\\_Report\\_EA.pdf](http://www.biodeg.org/files/uploaded/Carrier_Bags_Report_EA.pdf)

The impact of carrier bags has to be addressed through their whole life-cycle (paper bags need to be used 3 times more than plastic bags (131 more time for cotton bags) in order to take them below the global warming potential of single use plastic carrier bags.

Another study undertaken by BIO Intelligence Service<sup>8</sup> for ADEME has also demonstrated the limits of organic biodegradable bags, both in the production phase and as regards waste recovery (as these bags only biodegrade under certain specific conditions).

Commerce considers it is necessary to further analyse the ecological effects that any substitution materials may have. The Dutch Institute for Sustainable Packaging - KIDV, will present a report before the summer analysing the impact of different materials on natural resources, and the environment. Until clear and conclusive information is available, which conclusively demonstrates that alternatives to plastics are more environmentally-friendly during their life-cycle, we ask that the co-legislators delay their initiative on plastic bags.

#### **5. We ask that public authorities lead the way on education of consumers:**

Retailers provide carrier bags to their consumers as part of a service, in order to increase their shopping experience, and travel back home. Commerce companies are already involved in awareness raising campaigns. These initiatives have proven to have significant results and the commerce sector will continue to work responsibly to inform its consumers. However, it is important to highlight that all actors should be involved in these efforts equally, and that national authorities should take the lead in informing and educating consumers.

⇒ Commerce companies should not be the only ones asked to take action and raise awareness amongst consumers. We therefore support a cross-sector approach, involving all relevant actors proportionally.

#### **6. We support better and more efficient recycling schemes in the EU:**

Commerce calls for a comprehensive approach which can ensure that waste management schemes across the EU are improved, and that the overall environmental impact of plastic bags and other plastic materials is minimised.

Given the (comparatively) small impact of plastic bags in the environment (in relation to the overall amount of plastic waste), the focus should not be placed on carrier bags but rather on waste management infrastructures and the implementation of existing legislation.

Smart and comprehensive solutions are needed. According to the European Commission's 2011 "Assessment on the options to reduce the use of single-use plastic carrier bags", supportive policies in some Member States seem to be growing. These would have much greater impact on the environment, as it would drive Member States towards a "culture" of recycling.

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<sup>8</sup> "Contribution à l'évaluation des impacts environnementaux des sacs de caisses – Analyse du cycle de vie de sacs de caisse en matériaux biodégradable", 2005

## **Annex I – voluntary initiatives from the commerce sector:**

- In the UK, since 2006, the British Retail Consortium, retailers, each of the UK Governments and WRAP have worked together to support consumers in reducing consumption of single use carrier bags. A series of voluntary agreements have contributed to progress made, and figures published in summer 2013 show that the number of single use bags distributed between 2006 and 2012 declined by 34% (a reduction of over 4 billion bags). These figures also show that there has been a 50% reduction in the amount of new plastic used in all carrier bags.

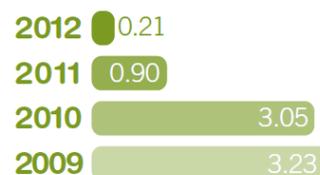
For further information:

<http://www.wrap.org.uk/content/carrier-bags-reducing-their-environmental-impact>

- In Austria, many food retailer chains switched to using 80% recycled material (recyclate) for the production of plastic carrier bags. Combined with a wide range of other alternatives to conventional plastic carrier bags made available to the consumer, such as paper bags, reusable textile carrier bags or bags made from renewable or biodegradable resources, food retailers individually succeeded in significantly reducing their consumption of primary plastic with carrier bags.

- During 2011 the Spanish retailer Mercadona extended to its whole chain the campaign aiming to reduce the consumption of single-use plastic bags that started in their stores in Catalonia in 2010. The campaign, aiming to encourage customers to re-use plastic bags, was implemented by signing voluntary agreements with nearly all Autonomous Communities (Comunidades Autónomas), in order to comply with goals set by the National Integrated Plan for Waste Management (Plan Nacional Integrado de Residuos, PNIR). During 2012 Mercadona reduced single-use plastic bag consumption over 90%, far over the set and foreseen goal. This means savings of over 13.000 tons of plastic per year

Plastic bags delivered per sales ticket



Re-using the bags we all have at home has reduced over 90% the consumption of the single-use plastic bags in all stores since 2010.

- The graph shows the reduction in the number of plastic bags delivered per sales ticket:
  - 2009 – 3.23 bags per ticket
  - 2010 – 3.05 bags per ticket
  - 2011 – 0.90 bags per ticket
  - 2012 – 0.21 bags per ticket
- In Belgium, in 2003, the commercial sector voluntarily pledged to limit the number of single-use plastic bags, and to promote alternative solutions as well. Within the framework of this voluntary agreement, the members of Comeos (the Belgian sectorial federation representing commerce and services) succeeded in lowering the tonnage ratio of disposable bags per sale by 86%. This is equivalent to saving 5,104.640 kg of plastic. At the same time, retailers have developed countless alternatives, which consumers have now adopted. These results are confirmed in the assessment of the sectorial packaging prevention plan which was submitted to the Interregional Packaging Committee.
- All supermarkets in the Netherlands do not give away the normal plastic carrier bags since 1992. Customers must buy these. For the lightweight plastic carrier bags (shirt-bags) at the checkout, supermarkets stopped providing them at the checkout. This initiative is part of the overall ambition of the sector to reduce energy use and CO2 emissions. We have calculated that we reduce yearly 500.000 kilo of plastic lightweight carrier bags. Wageningen University has calculated that this equals the energy use of 3500 households yearly.