



Position of Detailhandel Nederland on consultation of European Commission on reduction of plastic carrier bags

Detailhandel Nederland, further referred to as the Dutch Retail Association, represents the Dutch council for SME-retailers (MKB-Nederland) and of large retailers (Raad Nederlandse Detailhandel). As such the association speaks on behalf of 110.000 shops, which employ nearly 760.000 people and generate an annual turnover of more than euro 81 billion.

Registered as interest representative: nr 22232504133-92

Please find hereunder the reaction of the Dutch Retail Association on the consultation of the European Commission on options to reduce the use of plastic carrier bags.

Preliminary remarks

Carrier bags are first of all important to transport products bought at a retailer to the customer's home. Without such bags shopping would become difficult for a substantial number of customers, especially those who do not make use of a car, but instead walk, cycle or make use of public transport.

It should also be noted that bags are sometimes a necessity, regardless of the transport mode. This applies for example for clothes, which would become dirty or otherwise damaged during transport if not properly protected by a bag. In this respect there is a link with consumer protection rules. If for example fashion retailers would no longer be allowed to provide carrier bags, they would certainly want to see their responsibility limited for non-conformity of the product.

Bags could also be a necessity for certain categories of foodstuffs from the viewpoint of public health (for example hygiene). We would like to stress



that measures to reduce bags should take into account some characteristic differences between food and non-food retail (see question 2.3.1/2.3.3).

Although retailers are for good commercial reasons attached to the possibility to provide carrier bags as a service to the customer, they also have a keen eye for the environmental dimension. Retailers in the Netherlands have taken many initiatives to reduce the damage which bags could cause to the environment. A number of these initiatives are described below. We believe that the challenge is to find a proper balance between the interests of consumers, retailers and protection of the environment.

Answers to questions of consultation European Commission

1)

The Dutch Retail Association replies as industry association

2)

We disagree that it is necessary to adopt measures at EU level to reduce the use of plastic carrier bags.

2.1.1)

We agree that the establishment of waste prevention targets for plastic carrier bags provide for a significant reduction of plastic carrier bags.

2.1.2)

Waste prevention targets for plastic bags should be established at national level.



2.1.3)

Currently there are many initiatives in the Dutch retail sector to reduce carrier bags. Shops reduce bags for example by obliging the customer to actively ask for them at the check-out instead of letting them simply take them. They also charge customers for bags (all supermarkets for example charge for carrier bags) and/or draw the customers attention to the fact that it is good for the environment to re-use bags.

It is important that prevention targets are science based. Materials such as paper, jute or cotton have greater environmental impacts than plastic bags over their lifecycle. This implies that they are only better from an environmental perspective when they are used repeatedly.

It also paramount to accompany targets by consumer campaigns aimed at awareness and behavioral change.

Apart from the initiatives described above, there are in the Netherlands different safeguards to avoid that plastic bags escape the waste management system and damage the environment. Many shops participate in schemes of Nederland Schoon – Keep the Netherlands Tidy – to collect bags which otherwise might float away from their premises and parking spaces.

Another important safeguard is Nedvang - Nederland Van Afval Naar Grondstof - The Netherlands from waste to value. On January 2006 new legislation on packaging waste came into force. It concerns the Packaging, Paper and Cardboard Management Decree, or the Packaging Decree. Under this Decree, businesses are responsible for collecting and recycling any packaging they bring onto the market in the Netherlands.

The new Decree imposes full responsibility for collecting and recycling on the business community and obliges businesses to pay for the separated collection of household packaging. Nedvang was set up to help individual businesses comply with the Decree. It is funded by businesses. Nedvang



enters into agreements with municipalities to ensure that plastic packaging waste, including discarded carrier bags, are separately collected and recycled.

In 2008, of all plastic packaging waste in the Netherlands 36% was recycled, according to statistics of the European Commission. After recycling it is re-used. For 2012, Nedvang will have to live up to a recycling target of 42%.

Lastly, we would like to mention a special initiative of the supermarkets to reduce the use of a very particular carrier bag, namely the so called t-shirt bags. These are small bags, made of very thin and transparent plastic.

It is estimated that Dutch supermarkets currently provide on an annual basis 500,000 kilo t-shirt bags at the check-out. The supermarkets have collectively committed themselves to stop the free distribution of these bags at the check-out. Only on the fruit and vegetable department these bags will remain freely available.

2.2.1)

We disagree that a ban on plastic bags at EU level is needed.

2.3.1)

We have no clear opinion on whether pricing measures can effectively reduce the use of plastic carrier bags.

2.3.2)

Pricing measures should be best defined at the national level



2.3.3)

It is difficult to give a clear answer on the question whether pricing measures can effectively reduce the use of plastic bags. The most realistic answer is: it depends. An important variable is obviously the price level. If one would charge a couple of euro's for a carrier bag, then this would probably be a very effective measure to substantially limit the use of bags. If however the charge is modest, then this would probably still markedly reduce the use of bags in supermarkets, but this will not necessarily be the case in the non-food retail sector. Someone who buys electronic equipment for more than 100 euro, or a coffee machine, often wants a proper bag to carry these goods home. If he is required to pay for the bag, he will probably mostly do so. However, given the substantial amount already spent on products, the customer might easily feel that he is entitled to a free bag. Retailers in their turn will therefore be tempted to include the bag in the ticket price of the bought products.

In this respect it should also be noted that a charge on carrier bags could introduce a barrier to impulse shopping. This would especially be detrimental to non-food stores, in which impulse shopping is more prevalent than in supermarkets. Lastly, it is important to note that charges do have a relatively stronger impact on low income customers, who are more likely to make more frequent, but smaller purchases.

2.4.1)

Measures to reduce the use of plastic carrier bags should make a distinction between single use/ re-usable plastic carrier bags and between biodegradable/non-biodegradable plastic carrier bags.

3.1)

The current requirements on compostability and biodegradability in the packaging directive are partially appropriate.



3.2)

We agree that it should be clearly established that only those materials that biodegrade in natural conditions (i.e. on soil, in fresh water and/or in the sea) are to be called biodegradable.

3.3)

Biodegradability and compostability are often considered as the same thing. But the environment of an industrial composting facility is quite different to that to which oxobiodegradable polymers are expected to be exposed in any normal use. Both the temperatures and the likely microbiological activity are quite different. So when a plastic product is discarded to the nature, EN 13432 is not appropriate to label this product as compostable or biodegradable. This is an industrial standard.

As composting is a man-made process operated according to a much shorter timescale than the processes of nature, EN 13432 and other standards designed for compostable plastic are not appropriate for plastic which is designed to biodegrade if it gets into the environment.

3.4)

EN 13432:2000 specifies requirements and procedures to determine the compostability of packaging and packaging materials, but the scope of EN 13432:2000 makes it clear that is not intended for 'packaging waste which may end up in the environment through uncontrolled means, i.e. as litter'.

So another European standard must be established, which should rather be based on BS 8472 "Methods for determining the oxo-biodegradation and phyto-toxicity of plastics" and ASTM D 6954 – 04: Standard Guide for Exposing and Testing Plastics that Degrade in the Environment by a Combination of Oxidation and Biodegradation. Also, the EU should help the



promotion of the biodegradation technology, using raw materials that are necessary by-products of petroleum distillation. If these are not used for the polymerization process of synthetic polymers (polyethylene, polypropylene etc) we would be obliged to burn them or release them into the atmosphere.

Moreover, there is currently confusion amongst consumers regarding biodegradability of packaging, particularly plastics. Communication mechanisms must ensure that the consumer has access to clear and easy to understand information. Standardised labeling can occasionally be a good approach, but must be based on ISO 14021 requirements. The difference between home and industrial composting must be clear.

3.5)

We disagree that a mandatory EU labeling or marking system should be introduced to increase the visibility of biodegradable packaging products to consumers. The consumer is already overloaded and quite often also confused by all labels which are being used. Moreover, labeling increases the cost of products.

Brussels, 1 August 2011

For any questions and/or comments please contact the Brussels office of Detailhandel Nederland at 0032-2-7365830 or send a mail to:
hendrikjan.vanoostrum@dedetailhandel.nl