

Draft Environmental Protection (Single-use Plastic Products) (Wales) Bill - submission of evidence from Friends of the Earth Cymru

18/08/2022

Dear Sir/Madam,

Friends of the Earth Cymru would like to make a comment about one of the proposed exemptions in the 'carrier bag' section, namely:

(d) medicinal products or listed appliances supplied in accordance with a prescription issued by a health professional;

It is our view that this exemption isn't needed and should be removed.

We researched this issue in 2019. <https://foe.cymru/pharmacies-wales-still-use-millions-plastic-bags>

Pharmacies are responsible for still handing out millions of these small plastic bags each year. Their small size also means that they are basically unusable around the home for any other use.

Some pharmacies have moved to placing prescription medication in small paper bags, which are both easier to recycle effectively and also in turn, to be made from recycled paper. As privacy is the issue for these prescription bags then there is no actual reason they need to be made from plastic, paper works just as well.

During the course of our work on this, we came across some arguments traditionally put forward by certain pharmacies for not changing to paper bags. We consulted with independent pharmacists and ones who worked for some of the pharmacy chains to gauge their opinion on these arguments...

Privacy – the argument was that paper bags didn't give the same privacy that plastic ones do – we found that standard pharmacy paper bags are NOT in fact 'see through' as was being claimed and this is also evidenced by some independent pharmacies and larger ones such as Boots not having any issue with using paper bags.

Bag strength – the argument was that paper bags are not strong enough to hold a heavy bottle of medicine – pharmacists we spoke to confirmed that medicine paper bags come in different sizes (small, medium and large) and are quite strong enough for heavier items. Again, as evidenced by some pharmacies already using them without any issue whatsoever.

What we did however find was that the actual reasons for some pharmacies not using paper bags was that for some of the larger chains, individual pharmacies were regarded as 'spokes' with central 'hubs' being the places where prescriptions are prepared for distribution and it is these 'hubs' that are now geared to using plastic bags rather than paper ones. Given what we are trying to achieve by banning some SUP's, namely reducing our impact on our planet in a wide variety of

ways, the issue of a centralised 'hub' not really being geared up for paper bags rather than plastic bags, doesn't strike us as a valid enough reason not to change.

The other main reason we found from our discussions with those in the sector is that in some branch pharmacies, the storage shelves that they have on site for prescriptions waiting to be collected have been replaced over the years by rails with clips on them which are designed to hold plastic bags rather than paper ones. Again, rail design in a few pharmacies shouldn't be a reason now not to include prescription bags in this Bill.

Friends of the Earth Cymru don't believe that the preferred method of bagging in a distribution 'hub' and pharmacy storage rails constitute compelling and valid reasons for an exemption in this Bill. Given the sheer scale of the plastic problem and the climate emissions associated with plastic use, we can't let some laggards in this sector off the hook by the use of spurious arguments around bag privacy and bag strength, particularly as there are pharmacies already using paper bags with no ill effect.

It may only be a small change in the Bill but it is one we feel needs to be made as it helps show that requests for exemptions will be more thoroughly challenged and not just accepted at face value or just because the exemption was already in place due to decisions a few years ago.

Friends of the Earth Cymru therefore recommends that the proposed exemption for plastic prescription bags is withdrawn and that these SUP bags are also banned in Wales.

Yours sincerely

Bleddyn Lake