

## WRITTEN SUBMISSION FROM SIMPAC LTD

This is the response of SIMPAC LTD to the 20 questions you have requested views upon as follows:-

**Q1** The Bill creates a statutory framework for greenhouse gas emissions reductions in Scotland by setting a 50% reduction target for 2030 and an 80% reduction target for 2050.

**A1** The baseline against which these targets are being measured is either 1990 or 1995. Are these baseline numbers already available and if so where can they be found? That is critical for measurement purposes and the public must be told of them.

These targets are unrealistic and unattainable, without a huge ongoing tax burden on the people of Scotland and it would require a ridiculous and impossible commitment from politicians who will all be out of politics long before the final deadline in 2050. We have not and will NOT meet our meagre Kyoto Protocol targets which were at least realistic and attainable had we made a concerted effort so to do. No smug kudos for saying "we've done our bit" if the majority of the world ignores their part. Africa, Asia, and India represent more than 50% of the world's population and they will not allow us to stifle their economic revolutions. Furthermore it is naive of us to expect them to do so.

No other country has undertaken such a target as Scotland has proposed and whilst it might massage egos to think that we will be the leader in this field, all it will do is further denude the country of manufacturing industry, make Scotland uncompetitive, and create no appreciable difference to the alleged 2 degree rise in temperature which some experts THINK might be the extent of climate change over the next 100 years.

One part of this Bill (see section 15 below) will INEVITABLY INCREASE CO2 AND METHANE EMISSIONS yet it is included in a Bill to REDUCE such emissions. This is by no stretch of the imagination clarity of thinking, by introducing a Bill which in part will INCREASE the problems it is intended to solve.

**Q2** The Bill requires that the Scottish Government sets annual targets, in secondary legislation, for Scottish emissions from 2010 to 2050. It is proposed that these annual targets will be set in batches, the first being for the years 2010 to 2022 inclusive.

**A2** This is nothing more than a cop out. The lack of attaining the Kyoto targets should attest to that. A 12 year target with internal batching of say every 3 or 4 years with the Parliamentarians and /or Government changing every 4 years looks like a recipe for "blaming the previous administration politics" to me. If you are truly serious set annual targets and have the infrastructure in place to measure the effect against these targets so that within 2 months of the end of a year we, the public who would have to finance the reductions in emissions can truly judge their effectiveness. That gives the public a running total for the 12 years and your efforts can be measured against that and the voters can vote accordingly. Furthermore if other countries don't comply then we should not be boxed into set targets which the majority of the world's population is ignoring.

**Q3** The Bill provides that from the year 2020, the annual emissions targets must be set so that each is at least 3% lower than the target for the previous year. Prior to 2020, the Scottish Government has indicated that it intends to set annual targets which build towards delivering emissions reductions of at least 3% each year.

**A3.** Refer back to answer 1. This is a totally unrealistic approach, wonderful in conceptual pie in the sky thinking, but unattainable. It is impossible to plan more than the length of one Parliamentary term as unforeseen circumstances WILL occur, just as today, we have the credit crisis which is making a mockery of attempts to increase consumption whilst reducing emissions.

**This is simply posturing and should be kept out of the Bill so that we are not internationally ridiculed.**

Q4 The Bill introduces the concept of a “net Scottish emissions account” as a point of reference against which the target for reducing greenhouse gases can be measured. It is defined as the net Scottish emissions plus or minus any carbon units credited to or debited from the account. Any units purchased may be used to offset Scottish emissions. Any carbon units generated in Scotland and sold to customers outside Scotland, count as emissions made in Scotland...

**A4 You can massage figures as much as you wish, buy or sell carbon units as much as you want but the reality is it won't make the any significant difference to the level of emissions in the world. We represent about 0.07% of the worlds population. China and India represent together 37% . China has, for the past 3 years and for the next 2, been building and commissioning at least 2 new coal fired power stations every week. The Chinese public want heating in the winters and air-conditioning in the summer – we in the West have it, why shouldn't they? The people of India, who are industrially presently well behind China, dream of their electric washing machines and their petrol driven Tata motor cars rather than walking to work, and they all want to have running water and hygienic toilets. Power generation gives them all of these Western conveniences and the consequent greenhouse gas emissions from power stations are the least of their Government's concerns, however much they posture about their green credentials when talking to the West. Rightly, their Governments are more concerned about avoiding revolution and reducing hunger, poverty and disease, all of which will be helped enormously by industrialisation and employment.**

Q5 The Bill defines “Scottish emissions”, in relation to a greenhouse gas, as being emissions of that gas which are attributable to Scotland. The policy memorandum states that “Scottish emissions” are defined as being those greenhouse gases which are emitted in Scotland or which represent the Scottish share of emissions of gases from international aviation and international shipping.

**A5 This seems reasonable**

Q6 The Scottish Government has indicated that initially it intends to seek independent, expert advice on climate change from the UK Committee on Climate Change. The Scottish Government states in the policy memorandum that if it determines that the UK Committee on Climate Change does not meet all the advice needed for Scotland, the Bill contains provisions which will allow the Scottish Government to establish a Scottish Committee on Climate Change or to designate an existing body to exercise these advisory functions.

**A6 The key to this question is “independent, expert advice”. Let's ensure we understand the facts and not the current hype of the type of the now totally rejected Al Gore form of political misinformation. . It would seem reasonable to accept truly independent expert advice; save that this is a politically motivated Bill and the UK Parliament has little influence from the SNP which is the party in power in Scotland. However, if the Holyrood view is to accept the UK Committee independent expert advice, then we in Scotland should submit the independent advice we have already paid for in the question of charging for carrier bags which produced a unanimous conclusion in 2006 that the unintended consequences of charging for carrier bags would produce a negative effect on the transport used annually, the further destruction of the infrastructure in Scotland and an increase in waste findings leading to an increase in greenhouse gas emissions from such increased waste arisings. Sadly we are merely shadowing the Westminster Bill in this area and we have already rejected this section for Scotland. It has no place in this Bill.**

Q7 The Bill places duties on the Scottish Government requiring that it reports regularly to the Scottish Parliament on Scotland's emissions and on the progress being made towards the emissions reduction targets set in the Bill. The Bill sets out details of these reporting requirements.

**A7 Define regularly please. Annually would be a good definition. The public and voters need to be kept informed of the efficiency of Government.**

Q8 The Bill contains powers to allow the Scottish Government, by regulations, to impose duties on public bodies in relation to climate change, to issue guidance to those bodies relating to their climate change duties and to require that they report upon the discharge of those duties.

**A8 Please no more public sector jobs with attendant pension costs.**

Q9 The Bill places a duty on the Scottish Government to produce a report for Scotland, setting out its objectives in relation to adaptation to climate change, proposals and policies for meeting them and the timescales within which they will be introduced.

**A9 It would be good to know about what has actually happened rather than fanciful projections based on computer models based on hype. See A1 above on unattainable targets.**

Q10 Muirburn is the act of controlled burning of vegetation on open semi-natural habitats such as muir (Scottish word for moor) or moorland, and includes the burning of plants such as gorse, heather and grass. The Bill contains an enabling power to allow the Scottish Government to vary the permitted times during which muirburn may be made where they consider it necessary or expedient to do so in relation to climate change.

**A10 I understand there is a tourism connection in ensuring the regeneration of moorland, and if so please consult the relevant tourism authority and the owners of the moorland so burnt.**

Q11 The Bill will allow modification by order of the functions of the Forestry Commissioners to enable the Forestry Commission in Scotland to play a greater role in tackling climate change. The immediate intent of the Scottish Government is to take forward proposals relating to renewable energy development on the National Forest Estate and the release of capital from the National Forest Estate for woodland creation.

**A11 Not competent to answer this**

Q12

The Bill requires the Scottish Government to produce an action plan setting out current and proposed measures to improve the energy efficiency of buildings in Scotland, as well as measures to encourage behavioural change.

**A12 About time. Start with all publicly owned buildings which are a disgrace – automatic movement detectors for lights in all Government and Local authority buildings and set the heating at a constant 65 degrees with no exceptions.**

Q13 The Bill confers powers on the Scottish Ministers to make regulations providing for the assessment of (a) the energy performance of non-domestic buildings; and (b) emissions of greenhouse gases produced or associated with such buildings. The provisions are enabling in nature and the Policy Memorandum provides further information on the Scottish Government's thinking in this area.

**A13 Good.**

Q14 The Bill places a duty on the Scottish Government to take such steps as it consider appropriate to promote the use of heat from renewable sources. The Scottish Government has indicated this provision will enable it to introduce measures it deems appropriate to incentivise the production of heat from renewable sources.

**A14 I have no problem with this section. However, do all the sums, add up all the renewable resource power available in the next 30 years and we still will have people dying from the cold, the lights turned off and industry handcuffed unless we introduce an element of nuclear power. My children and grandchildren will be stymied from providing themselves with a decent lifestyle. Nuclear power we CAN, WILL and MUST learn to deal with if Scotland is to be a force in the decades remaining of this century and beyond.**

Q15

The Bill sets out measures aimed at improving waste and recycling. The Bill gives powers to the Scottish Government to make regulations in the following areas:

- Waste prevention and management plans;
- Waste data;
- Deposit of recyclable waste;
- Procurement of recycle;
- Reduction of packaging;
- Deposit and return schemes;
- Charges for carrier bags.

**A15 I do not think that unregulated powers of this nature should be sneaked through as part of a Climate Change Bill or any other Bill. This give enormous power to the Government of all flavours going forward, which allows the introduction of law in any of the areas mentioned WITHOUT FURTHER CONSULATION OR EXAMINATION BY THE PUBLIC. The Environment Minister says these may well not be used, and are a backstop. This kind of legislation has NO PART in a democratic society and should be excluded in its entirety.**

**Charges for carrier bags: - Why this appears anywhere in this Bill and particularly under waste reduction remains a travesty of our democratic process. The Scottish Parliament has already in 2004 – 2006 spend an estimated £2,000,000 of taxpayers money investigating a proposed Environmental Levy on Plastic Bags Bill and unanimously rejected that Bill for very clear unambiguous reasons that to do so would create substitution of lightweight plastic bags by heavier bulkier and more inefficient carriers which was clearly and quantifiably proved to be counterproductive in reducing waste. Whilst Section 59 is all encompassing and non specific as to the material from which the carrier bags are manufactured, there is no doubt that measures already undertaken to reduce the number of bags used (as endorsed by all four UK environment Ministers) has inevitably increased the weight of product used, the bulk of the product used and defeat the very intention of the measure suggested.**

**There have already been two long and costly “consultations” undertaken by Parliament on this issue. The first when examining the proposed Levy Bill elicited over 1100 responses, over 1000 of which specifically said “no” to a levy on plastic bags. The second, on the Implementation of Zero Waste proposals, stated that “the proposal relating to single-use carrier bags only received support from a minority of respondents”. Both indicated clear majority opposition to the idea of having to pay for carrier bags. It is therefore undemocratic to include such a measure when the issue has already twice been consulted upon, and unanimously rejected by Parliament.**

**Furthermore, all of the major UK retailers have already signed up to a voluntary code of conduct in 2007, instigated and endorsed by the Carrier Bag Consortium ( [www.carrierbagtax.com](http://www.carrierbagtax.com) ), which required retailers to reduce the ENVIRONMENTAL IMPACT of carrier bags by the end of December 2008 by 25%. This has not yet been**

officially reported upon (WRAP have however indicated that the target has been exceeded) but the retailers involved have now undertaken with the UK Government to reduce the NUMBERS of carrier bags by 50% from the base line in mid 2006, by the summer of 2009.

You will all have seen and understood the retailer campaigns being run, including being asked if you need a bag, to bring back the previously used bag, to pay for a carrier bag, to buy alternative products, jute, cotton, nylon, bags for life, woven polypropylene and nonwoven polypropylene, and the occasional switch to paper from plastic in non food applications.

All of these campaigns are been promoted as being “better for environment” and more “ecologically friendly” so why did the Scottish Parliament unanimously reject that in 2006?

The answer is a combination of many reasons which are listed below and expanded in further detail for your understanding. Be aware that it is only the lightweight polyethylene (plastic) supermarket carrier bag that is actually being targeted under this section 59 of the proposed Bill as it is the one which is most in use throughout the UK, and no other type of bag has shown any reduction with all the substitute products having increased availability and use.

Accordingly, a reduction of 50% (as prescribed by the agreement mentioned above) in the number of carrier bags will probably

1. Increase the weight of bags used in Scotland from 10,610 tonnes to 38,343 tonnes per annum
2. Increase the bulk and cubic capacity of bags used in Scotland from 27,660 cubic meters to 232,476 cubic meters per annum of product.
3. Increase the weight of transit packaging from 704 tonnes to 4,100 tonnes per annum
4. Increase the number of lorries - full (unlikely to be full) 20 ft lorry loads from 3,457 to 29,059 per annum
5. Increase the number of full pallets moving around our country from 76,064 to 639,306 per annum
6. Increase the amount of carcinogenic exhaust fumes from vehicles as a result
7. Increase the traffic congestion in our cities, towns and countryside as a result
8. Increase the incidence of road kill of our animals and probably humans
9. Contravene the Kyoto principle, the Bali agreement, the Poznam agreement, EU, UK and the Scottish targets set for Carbon Dioxide, Methane and other greenhouse gas reductions, by increasing their emissions.
10. Cause an estimated 700 - 1000 job losses in Scotland alone.

This is a much increased and greater environmental cost than that which was estimated in 2006 as the substitute products for the lightweight carrier bags being replaced which are all being sold in today's retail market are far heavier, bulkier and incidentally more expensive than was anticipated in 2006.

These are more accurate figures from those which the Environment and Rural Development Committee (ERDC) reviewed in 2006, as we now know what substitute products have been introduced, and when this potential disaster was understood by them, they had the foresight to understand the damage to the environment that they were being asked to make into law. Thankfully they intelligently voted unanimously against this ill conceived idea. Further consequences not able to be quantified by me, inevitably include more exhaust fumes, more traffic congestion, more road damage, more wildlife and probably human road kill as well.

Sadly the damage does not end there. In that significantly fewer lightweight supermarket carrier bags are available, the public will be forced to replace their re-use which, according to WRAP pre the introduction of the Code of Conduct, stood at between 74 and 80 %, with alternative truly single use products. These are likely to be an increased use of plastic black bin bags, pedal bin and swing bin liners, nappy bags, dog dirt bags, and food, freezer and sandwich bags to carry lunches and sandwiches to work, all of which will negate any perceived benefit from the introduction of charges to reduce lightweight plastic carrier bags.

Detailed analysis of the calculations based on actual weights of products currently available and, estimated usage based on information obtained in the market place, are attached as [Appendix A](#), [Appendix B](#), [Appendix C](#). They show clearly the position as it was for Scotland alone in 2006/7 and as it is likely to be in mid 2009 with the products currently available. Back up sheets show the product analysis with weights and the packaging and bulk calculations for all products. To really frighten yourselves, multiply all figures by 13 to arrive at the UK damage which will be inflicted on our Environment.

Do not be misled by either the tacit mildly reluctant acceptance by the retailers of this required reduction in number of bags or that they are anything other than ecstatic and enthusiastic about these plans to reduce free carrier bags. Please take time to understand the following,

1. The retailers reduce their costs by reducing the number of bags they give away “free”. In the UK when there is a 50% reduction in number, that is tantamount to Government handing them extra net profit annually of £100,000,000
2. Should they charge 5p for the remaining lightweight bags (as M & S do) they will save another £50 - £120 million per annum , less what they generously give of the public’s money to charity after deducting the costs of the bags, an administration cost, and the VAT remitted to the Treasury. The ever suffering public believes all their 5p is going to charity, and it most certainly is not.
3. They now sell many different types of alternative bags, jute, cotton, heavyweight plastic, woven and non woven polypropylene and nylon bags, all making significant profit for the retailers
4. They are seen to be “generous” giving the “net proceeds to charity”. It’s the PUBLIC’S money they are donating without any contribution from them.
5. They are perceived to be “doing good for the environment” when, if you understand this submission, they are actually damaging it.

This remains a shrewd commercial decision rather than a studied philanthropic one for the retailers.

These are some of the quantifiable DIRECT environmental costs which will occur by simply reducing the number of lightweight supermarket bags in circulation. The unquantifiable, but inevitable, increased damage from points 6 – 10 above, will be hugely significant.

There are further INDIRECT costs to the environment as well. In Eire, when they introduced a €15 cent plastax (now increased to €24 cents per bag) in 2002, the whole retail experience changed. No plastic bag was exempt from the tax other than small bags under approximately 250 x 375 mm. As a consequence, there was, and remains a visual and almost universal change from plastic to paper bags in the non food retailers. Boots, Mothercare, Next, Topshop, Evans, Miss Selfridge, M & S, Topman, Burton, Debenhams, to name but a few, all changed from plastic to paper in Eire only, whilst retaining plastic in their UK operations. Furthermore, in Eire, many of the paper bags had to be laminated with polypropylene (another plastic) to stop them disintegrating when wet and avoiding ink transfer onto clothes when carried. Yet another unintended consequence of the tax was therefore using more plastic than saving.

In the Irish food supermarkets the whole retail presentation of food altered with all fruits, vegetables, pies, bakery products and deli products changing from being sold loose, to being sold in collation packs, so that they were not contaminated by being placed in the dirty, reusable non-plastic substitute carrier bags inevitably soiled by milk spills, dirt absorbed from the pavement, soap residues and other unsavory unhygienic contaminants (this is a public health hazard waiting to happen).

You simply cannot buy loose fruit or vegetables in an Irish supermarket – they are all now prepackaged in plastic trays and plastic clam shells, wrapped inevitably in shrink film. To give you some indication of the crass stupidity of this decision, 4 bananas in an Irish supermarket are now presented on a plastic tray, covered in shrink film with two paper adhesive labels attached thereto, one showing country of origin and the other the price. The weight of all that packaging is equal to 7 times the weight of a UK supermarket check out carrier bag and 16 times the weight of a fruit and vegetable carrier we use at present. The packaging consisted of 4 different base materials which rendered the waste very difficult to recycle. These changes WILL inevitably happen in the UK if the public increasingly do not have free carrier bags supplied at the checkout.

Factually in Eire the weight of plastic film used annually increased by more than the weight of film saved as the public bought heavier bin bags and garbage bags to compensate for the lack of carrier bags used to contain their waste rubbish.

The Irish turn a blind eye to these massive hidden waste increases, please do not make the same mistake by ignoring these inevitable consequences for Scotland.

Recently, the Environment and Rural Development department announced a £5 million fund availability over a two year period for “ improving material recovery facilities and to develop a home market for plastics reprocessing, and inform us that they will be working to significantly increase public awareness of waste issues, including reprocessing carrier bags.” Whilst I am truly encouraged that Parliament is at least making some attempt to address the plastics issue, the inclusion of plastic carrier bags under this funding is totally unnecessary and compounds a glaring lack of knowledge of facilities already available within Scotland.

May I respectfully remind you of the statement from John Langlands, the MD of British Polythene Industries, a major Scottish Plc, at the evidence taking on the failed attempt to levy a charge on plastic bags in 2005, whose recorded response to the Environment Committee, including Mr. Lochhead the current Environment Minister, on October 26<sup>th</sup> 2005 was as follows:

“We are the largest recycler of polythene film in the UK and probably in Europe—we recycle about 75,000 tonnes of polythene film a year. If you can get it to us by whatever means, we can recycle it. The stuff that we cannot turn into refuse sacks or building film we turn into Plaswood, which we use to manufacture park benches and signs, for which we have won awards and which we sell to Scottish local authorities. That is a good use of recycled products and something that must be encouraged and developed in the community.”

This Scottish facility, in Dumfries, for recycling plastic film and carrier bags is and has been in place for over two decades. Why don't local authorities use it? Also the TIC committee should be educating these local authorities in an understanding of what is needed to instigate a collection service from the public which delivers what you seek without a penny of your £5 million allocation. Save the fund for hard plastics, ABS, PET, PP, PS and PVC, all of which are far more prevalent, both in tonnage and in bulk, in our waste stream than polythene film. It would be a very brave, and some will say stupid, businessman who, in these difficult times, would invest today in recycling plastics or paper with such uneconomic price levels for these products coupled with surplus raw material already available worldwide.

Plastic is environmentally easily and economically recycled, using less resource than any of the substitute products both initially and on recycling, and Parliament should be encouraging continued use of lightweight bags rather than reducing their use which leads to further damage to the environment from substitute products.

The Government should be far more proactively encouraging the public to reuse their lightweight plastic carrier bags where hygienically possible, and to recycle them in the plethora of disposal units now visible in the forecourts of most major supermarkets. It should demand and encourage Local Authorities to instigate a collection from householders of plastic carrier bags. It should provide educational literature for schools aimed at encouraging the intelligent use, reuse and recycling mantra on plastic bag use, and not demonising them.

The carrier bag industry, more specifically the plastic carrier bag industry, is under attack from all sides

1. The UK Customs and Excise impose import duties on imports ranging from 3% to 25%
2. The EU has imposed additional anti-dumping duty on plastic bags ranging from 5% to 29%
3. Towns and villages attempt to force a ban plastic bags which is legally unenforceable, as confirmed by Jane Kennedy, the UK's Environment Minister (Hansard Monday 19 January 2009)
4. Government in Westminster regards them as evil with the Prime Minister stating that he "wants to get rid of plastic bags"
5. Government in Scotland specifically includes them in their Zero Waste initiative and again specifies them in the draft Climate Change (Scotland ) Bill
6. A two year campaign, voluntarily undertaken by all the major retailers to reduce the ENVIRONMENTAL IMPACT of carrier bags by 25% then subsequently changed to 25% in NUMBER of carrier bags without consulting the parties involved.
7. A further extension to that policy to reduce the NUMBER of carrier bags by 50% from the 2006 base level (around 1 billion carrier bags in Scotland) by summer of 2009.

All aimed at reducing what you must think is a massive part of our household waste findings.

The reality is that household waste arisings in Scotland amount to some 3,500,000 tonnes annually, of which, in 2006, ALL plastic carrier bags accounted for less than 8,500 tonnes per annum. At that time, paper and card based household waste accounted for 850,000 tonnes and with the demise of a paper maker in Fife that claimed to recycle over 100,000 tonnes per annum, that figure is actually around 950,000 tonnes of paper waste per annum. The voluntary scheme mentioned in point 6 above has (as agreed by WRAP) been met and exceeded, therefore reducing the tonnage of plastic to less than 6,400 tonnes per annum.

This now represents less than 0.2% of waste arisings and why should time and energy be wasted on such an insignificant percentage of waste when there is close to a million tonne mountain of paper waste and other identifiable component groups like food requiring more immediate action.

Furthermore, the reduction by 50% of the NUMBER of carrier bags used in Scotland, will have consequences which will hugely damage the environment of our country as



the public are forced, by ill conceived Government policy, to reduce the number of lightweight bags in use only to substitute them with heavier reusable bags made from paper, jute, cotton, woven and non-woven polypropylene. This is not just a possibility – it has and continues to be happening right now. If even half of the surviving 50% of the carriers remain lightweight supermarket carriers then these unintended consequences are already damaging our environment.

Do not close your mind to these consequences and understand that they ARE ALREADY HAPPENING, and as a result, the Kyoto protocol, the Bali agreement, the EU targets for carbon dioxide and methane gas reductions all will be significantly more difficult to achieve as this new mountain of waste, enough to cover the pitch at Hampden to a depth of 30 meters every year, will generate significant increases in both these greenhouse gases and more if the landfill physical conditions are met.

In terms of transport here are some facts: One 20 ft container will hold approximately:-

- |    |  |    |
|----|--|----|
| 1. | 1,700,000 lightweight plastic supermarket bags           | or |
| 2. | 300,000 heavyweight plastic “bags for life”              | or |
| 3. | 70,000 equivalent strength paper carrier bags            | or |
| 4. | 45,000 woven polypropylene plastic carrier bags          | or |
| 5. | 35,000 non woven polypropylene plastic carrier bags      | or |
| 6. | 22,000 jute carrier bags (with laminated plastic lining) | or |
| 7. | 30,000 cotton carrier bags                               |    |

Please relate these numbers to storage, transport and disposal logistics.

Serious awareness should also be understood about the “down weighting” which continues unabated in all forms of packaging and manufacturing today: the substitution of glass bottles by plastic bottles: the change from cardboard collation packs to plastic packs, the lightening of motor cars, and all forms of public transport by changing from steel bodywork, bumpers and interior fittings to plastic panels: shrink film and plastic vacuum packs replacing cardboard cartons; plastic pallets replacing wooden ones: paint pots changing from steel to plastic; fruit and vegetable transit packaging to avoid damage and extending food shelf life changing from paper and cardboard to plastic; paper carriers changing to plastic carriers; soup tins changing to plastic cartons and pouches; metal pipes changed to plastic, wooden and metal windows changed to plastic, are just a few of the changes seen recently.

Why? – simply to reduce packaging waste, reduce overall weight for transport considerations and increase energy efficiency, preserve products from spoiling and transit damage, increase shelf life, reduce theft, increase efficiency and preserving resources - all of these are achieved by down weighting and all are achieved by changing from various materials to plastic. What this section of the draft Bill will do is increase the weight and bulk of the product and in many cases increase the complexity and variety of materials used, rendering them more difficult to recycle – clearly going against all that is happening in the market place to use less of the world’s resources and become more efficient. The Courtauld Commitment, a voluntary agreement, launched in 2005, between WRAP and the major grocery retailers has as one of its aims, that the signatories must seek ways to reduce the weight of packaging. This Bill will be doing exactly the opposite.

Do not be taken in or take decisions under the mistaken belief, that we will save any oil as a result of this projected change. Polyethylene (plastic) bags are manufactured from by products, naphtha and ethylene, resulting from the distillation of oil and gas into fuel. Accordingly, for as long as we drive cars, use buses, trains, aircraft and bikes or switch on an electric light, these by products will be produced and if not used in the manufacture of plastics, it would be flared off into the atmosphere.

Our overview of the targets set by the draft Bill is that they are commendable but probably unrealistic and therefore unachievable and accordingly are likely to concentrate efforts in the wrong direction. We should be encouraging solutions to deal with the possible 2 degree warming estimated to occur within the next 100 years, for example bringing more current unproductive cold agricultural land into producing additional food and revenues. Continue to seek alternative energy solutions by all means, but do not ignore the opportunities which such warming will bring.

There will be an enormous cost to the people of Scotland (and to the rest of the World) in the cause to reduce emissions, in the perhaps mistaken belief that in so doing, we will address the problem of climate change. I do not profess to be an expert in this field, but I would recommend that every member of the Committee, in order to gain a comprehensive alternative view to that which is currently in vogue on this issue, reads the following books on the subject of Climate Change, which will undoubtedly change their perspective of what they are attempting to achieve.

1. The Skeptical Environmentalist by Bjorn Lomborg published in 2001
2. Cool It by Bjorn Lomborg as an update published in 2007
3. An Appeal to Reason by Nigel Lawson, former Chancellor of the Exchequer

Lomborg, a Danish statistician regarded by Time magazine as one of the 100 most influential persons on Earth, comprehensively and with unchallenged statistical facts, destroys Al Gores "An Inconvenient Truth" analysis of the problem, and whilst Lomborg does not deny that there is a slight warming of the earth, he provides historical evidence suggesting that this is a natural, perfectly normal, repeating cycle. These three books explode the many myths associated with the current hysteria on climate change and that we are responsible for it. Lomborg's view is that the cost of fighting climate change cannot be justified by the likely benefit, and that there are more pressing problems for the world to address. He proves, for example, that many more people die from winter cold than would perish in future from summer heat waves, and that climate change will, therefore, save more lives than it costs. He also proves that the reduction in numbers of polar bears is caused by humans killing them and has nothing whatsoever to do with global warming.

This draft Climate Change Bill has many sensible and very demanding targets for the country to meet. However there is no justification for the continuing attack on the ubiquitous plastic carrier bag as such a move will only make those targets much more difficult to meet.

Contrary therefore to what is proposed in the draft Bill, Parliament should avoid the stigma of introducing a Bill which increases environmental damage and produces even more carbon dioxide and methane gases, by not only encouraging the use of lightweight plastic bags, but also their sensible re-use and highlighting their recycling properties, for the simple reason that they are clearly the most efficient environmentally friendly product currently available for transporting retail purchases home.

Q16 What are your views on the adequacy of the Scottish Government's consultation in advance of publishing the Bill?

A16 The ONLY product specifically mentioned in the whole of this bill is "carrier bags". No request for either attendance at the evidence giving was made to anyone in the manufacture, import, distribution or business of supplying plastic carrier bags was sought and no request for information from this section of business has been made. In that 95% of the carrier bags in 2006 were agreed by Government to be made from plastic, it is surely remiss of both the TICC and REA committees to proceed to

**comment upon laws which will materially affect these businesses and their employees. The consultation in this specific regard has been totally inadequate.**

Q17 Do you have any views on the Strategic Environmental Assessment which was carried out by the Scottish Government out on the consultation proposals?

**A18 I have no knowledge of when this was commissioned or what the Assessment concluded.**

Q18 Does the Bill raise any equalities issues you would wish to highlight?

**A18 Equalities? Irrelevant for Climate Change save that the public may be forced to buy carrier bags which would discriminate against the poor.**

Q19 Do you have any comments on the impact of the Bill on sustainable development?

**A19 If we don't embrace new nuclear power stations then our beautiful countryside and our inshore waters will be smothered by wind farms, hydro electric dams and wave power generators. The tourist industry, so important for Scotland, will die.**

Q20 Do you have any other comments on the Bill?

**A21 Remove section 59 in its entirety. It will**

- 1. Increase Transport throughout Scotland**
- 2. Damage the Infrastructure throughout Scotland**
- 3. Have a damaging effect on the Climate Change Bill by increasing greenhouse gas emissions.**

**Isn't that exactly what the Transport, Infrastructure and Climate Change committee are to report upon?**

**If you don't recommend removal of this section you will be passing a Bill which includes a section which runs contrary to all the other sections and will merely undermine all other efforts to address the perceived issue.**

**Simpac Ltd  
Spiersbridge Avenue  
Glasgow G46 8NL.**