

Your submission to Proposed mandatory phase out of single-use plastic shopping bags

Hannah Blumhardt & Liam Prince,

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Submitter Type: Individual

Clause

1. Do you agree with the proposed mandatory phase out of the sale or distribution of single-use plastic shopping bags in New Zealand, including those made of degradable (eg, oxo-degradable, biodegradable and compostable) plastic? Why / why not?

Position

Yes

Notes

We support the mandatory phase out of the sale/distribution of single-use plastic shopping bags, as well as oxo-degradable, biodegradable and compostable bags. We are also of the view that no single-use bags should be distributed for free in New Zealand, including brown paper bags. We support the phase out of single-use plastic shopping bags because they are one of many types of plastic that cause harm in the environment, because they are a logistical headache for landfills given the ease with which they can leak out, and because there are readily available reusable alternatives. We are very pleased that oxo-degradable, biodegradable and compostable bags are included in the consultation proposal. Our experience travelling around New Zealand discussing waste issues with the public is that high levels of confusion surround these different terms. Most people do not understand the problems presented by biodegradable/compostable materials in landfill, or that commercial composting is usually required to break down the biodegradable and compostable options effectively (for which there is insufficient infrastructure and collection services in NZ, as the discussion document notes). Even for bags that are home compostable, many people do not have home composts. When compostable bags leak into the environment, even if they do break down into non-toxic particles, they still pose a threat to wildlife prior to their breaking down. We place oxo-degradable bags in a separate category to biodegradables and compostables given they are still petroleum-based and break down into microplastics if leaked into the environment, so have no redeeming qualities. They should definitely be included in the mandatory phase-out. More broadly, we support the mandatory phase-out's inclusion of all degradable plastics because at heart we would like to see a greater move away from all single-use bags, regardless of what they are made of (in fact, we would also include brown paper bags in the phase-out). Phasing out some single-use bags and not others simply because those others claim to be 'eco' or 'compostable' would effectively legitimise the use of those alternative materials, without a broader conversation about the desirability of encouraging a less throwaway culture based on reusables rather than disposables. Aiming for the broadest phase out of single-use shopping bags as possible is a great opportunity to make clear that single-use items are increasingly unacceptable on a planet with finite resources.

Clause

2. We have proposed a mandatory phase out of single-use plastic shopping bags. This could include under 50 microns or under 70 microns in thickness. If you agree with a mandatory phase out, which option do you prefer, and why?

Position

less than 70 microns in thickness

Notes

The mandatory phase-out should include bags up to the highest proposed level of thickness (70 microns). Overseas experience demonstrates that retailers shift towards bags slightly thicker than those phased out. The thicker the phase-out, the more likely that the alternatives retailers adopt will be more durable and reusable.

Clause

3. Are you aware of types of single-use plastic shopping bags that should be exempt from a mandatory phase out?

Position

No

Notes

No single-use plastic shopping bags should be exempt from the phase-out.

Clause

4. Do you currently manufacture, sell, provide or import for sale or personal use these types of single-use plastic shopping bags:

Position

No

Notes

Clause

5. Should smaller retailers be exempted from a mandatory phase out of single-use plastic shopping bags? Why / why not?

Position

No

Notes

We do not support exemptions for smaller retailers. First, exemptions will make enforcement more complicated than a blanket ban. Second, alternatives are both readily available and affordable, even for smaller retailers, who can always cover costs by charging for their alternatives. Customers can also use their own reusables at smaller retailers, just as they would at larger retailers. Third, the environmental risks presented by plastic bags exist regardless of whether the retailer is small or large - our view is that the government should draw a line in the sand that single-use plastic bags are not acceptable. Fourth, a mandatory nationwide phase-out will not disadvantage one small business against another because everyone will be in the same boat (i.e. there is no freeloader problem).

Clause

7. The proposed mandatory phase-out period for single-use plastic shopping bags is at least six months from when regulations are Gazetted, subject to consultation. Do you agree with this timing?

Position

Yes

Notes

Six months is appropriate. However, the phase-out period should not exceed six months, which is ample time for businesses and customers to adapt, especially as major supermarkets have already begun their transition.

Clause

8. Do you agree that the benefits expected from implementing a mandatory phase out of single-use plastic shopping bags exceed the costs expected from implementing the phase out? Why / why not? Please consider both monetary and non-monetary costs and benefits (those that can be measured by money as well as those that can't).

Position

Yes

Notes

The monetary and convenience costs of phasing out single-use plastic bags are far outweighed by the environmental benefits of removing these items from the waste stream, as well as the symbolic benefits the ban will reap in terms of instigating a deeper conversation about waste reduction in New Zealand, and behaviour change around reusables. Many have noted that low-income households may be disadvantaged by having to buy reusable bags. First we note that although many members of the public may not already be using reusable bags, most people do already have some form of bag in their home already. It is not strictly necessary for people to spend money purchasing bespoke reusable shopping bags, so the ban does not necessarily have to result in households spending money on new bags. Nevertheless, an accompanying policy could involve one-off provision of free reusable bags (preferably of jute or some other durable natural fibre) to households that need it. Supporting local industry or community groups to produce bags, for example, Kete or Boomerang Bags, would be a nice way of procuring further benefit from the plastic bag ban while avoiding the perverse outcome of millions of polypropylene reusable bags.

Clause

9. Do you think that reasonably practicable alternatives to single-use plastic shopping bags exist in New Zealand? Why / why not?

Position

Yes

Notes

Yes, reasonably practical alternatives to single-use plastic shopping bags exist in New Zealand. We have not used a single-use plastic shopping bag for 4 years and we have managed just fine. We have not needed to purchase a single reusable bag either because what we found was, like many households in New Zealand, when we actually looked around our home, we already had quite a lot of bags. However, we recognise that many people will want new reusables. Major supermarkets have already developed and brought out reusables for their own voluntary phase-outs. However, we do encourage the government to take the lead in encouraging uptake and availability of bags that are produced locally out of sustainable materials - whether natural fibre or upcycled materials. There is huge potential to support Kete making or Boomerang Bags (which already carries considerable expertise for producing reusable bags en masse, but could do so much more with some financial support). New Zealand has a huge textile waste problem, so working with community groups diverting some of this material, such as Vinnies Re Sew, or The Formary, to consider large-scale repurposing for bags, would be a nice opportunity. Providing support to individuals on low incomes to source sustainably-made reusable bags would be an appropriate task for government.

Clause

10. How can people be encouraged to reuse multiple-use shopping bags enough times to offset the environmental impacts of producing them? (select one or more)

Position

national information campaign and mobile phone app for shoppers

Notes

We have noted, during our full-time waste minimisation speaking tour around New Zealand, that most of the public simply do not have time to be fully informed about the environmental impacts of the various materials that might be an alternative to plastic. For example, there is a lot of nostalgia about brown paper bags, despite the fact that their environmental impact earlier on in their life-cycle is arguably higher than plastic. For the public to then translate this information into the complicated idea of off-setting through reuse, is another step again. Accordingly, we are of the view that an accessible and visible national information campaign on these matters would be very helpful. Even simple information in tables as presented in the discussion document about the relative impact of

different shopping bags of different materials would be useful, especially if that is then translated into what that means for people practically, i.e. "this means to be really eco-friendly, you need to use your reusable X times!" Ideally, this information would also be present in supermarkets, and other places where people are likely to be using shopping bags. Or even included on the bags themselves. Voluntary incentive schemes may well be an appropriate measure in the context of a broader, more systematic, government-driven campaign. They shouldn't be relied upon as the sole measure for informing the public as this could produce inconsistent messaging + potentially self-serving claims about the bags that the individual retailer is selling.

Clause

11. What would help you and your family adjust to life without single-use plastic shopping bags?

Notes

We already do not use single-use plastic shopping bags and we didn't find it that hard to adjust, even though before that we probably used them reasonably frequently. For the wider public though, our view is that people struggle to avoid these bags because they are currently readily available and free, so there is no incentive to learn to remember reusable bags, nor develop reuse habits. This is why we support a mandatory phase-out of single-use plastic shopping bags; without the option readily available, people will be forced to work it out. In our view, people are not going to stop buying and eating groceries because free plastic shopping bags are no longer available - they will find a work around that involves the use of reusables. Having said that, many families may need support to navigate alternatives for the uses they currently put their 'single-use' plastic shopping bags towards. The most common tasks we get asked about are lining rubbish bins and picking up dog poo. Many on social media have remarked that they will simply turn to buying brand new bin liners to line their bins, which would be a perverse outcome of the shopping bag ban. Accordingly, it would be helpful for any national information campaign to also provide alternatives for these purposes, including a conversation about home composting (if people didn't put food scraps in the bin, they probably wouldn't need to line the bin with anything at all), and encouraging councils to provide guidelines for removing dog poo without the need for single-use plastic shopping bags (i.e. pooper scooper, reusing the same bag, etc).

Clause

13. Please provide any additional comments or suggestions about the proposed mandatory phase out of single-use plastic shopping bags.

Notes

We support this proposed plastic shopping bag ban as well as what it represents regarding the government's willingness to start using the Waste Minimisation Act to introduce mandatory measures for reducing waste in New Zealand. We encourage further action under the WMA that would complement this plastic shopping bag ban, including using s 23(1)(b) to regulate further single-use plastics (following the lead of the EU Commission or Pacific Island States), or declaring packaging a priority product to be regulated by a mandatory product stewardship scheme, or introducing a mandatory, nationwide container deposit scheme for beverage containers, using either s 23(1)(e) or the mandatory product stewardship provisions.