

13 September 2018

Ministry for the Environment  
PO Box 10362  
Wellington 6143  
New Zealand

By email: [plasticshoppingbags.submissions@mfe.govt.nz](mailto:plasticshoppingbags.submissions@mfe.govt.nz)

**SUBMISSION on Proposed Mandatory Phase Out of  
Single-use Plastic Shopping Bags**

**1. Introduction**

- 1.1. Thank you for the opportunity to make a submission on the proposed mandatory phase out of single-use plastic shopping bags. This submission is from Consumer NZ, New Zealand's leading consumer organisation. It has an acknowledged and respected reputation for independence and fairness as a provider of impartial and comprehensive consumer information and advice.

Contact:

Consumer NZ  
Private Bag 6996  
Wellington 6141

**2. General comments**

- 2.1 We support the introduction of a ban on single-use plastic bags. Our answers to questions one to 10 in the consultation paper are set out below in the template provided by the ministry.

Thank you for the opportunity to make a submission. If you require any further information, please do not hesitate to contact me.

Yours sincerely

Chief Executive

## Consultation questions

### Question 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?

Yes, we support the proposed mandatory phase-out of the sale or distribution of single-use plastic shopping bags.

Our latest consumer issues survey shows a majority of shoppers support a ban on single-use plastic bags:

- Seventy-one percent said they were happy to use re-usable bags if plastic ones weren't available at the check-out. Only 15 percent thought plastic bags should continue to be free.
- Eight out of 10 consumers were already using reusable bags: 44 percent were using reusable shopping bags all the time with 39 percent using them some of the time.

These results are from a nationally representative survey of 1022 New Zealanders aged 18 years and over, and carried out online in December 2017.

### Question 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?

We support a ban on single-use plastic bags under 70 microns in thickness. In our view, including bags between 50 and 70 microns would increase the ban's effectiveness.

### Question 3

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

No. In our view, there are practical alternatives to single-use bags and a high proportion of consumers are already choosing them.

### Question 4

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

- a. 50 microns or less in thickness
- b. more than 50 microns and less than 70 microns in thickness?

If yes, please specify which bags and explain how a phase out would be likely to impact on you.

No.

### Question 5

Should smaller retailers be exempted from a mandatory phase out of single-use plastic shopping bags?

No. In our view, smaller retailers should not be exempt from a mandatory phase out of single-use plastic shopping bags. Given the proposed phase-out period, all retailers should have sufficient time to source suitable alternatives or advise their customers they will no longer be providing single-use bags.

**Question 6**

If smaller retailers are exempted from a mandatory phase out of single-use plastic shopping bags and they are defined by their number of full-time equivalent employees, what should that number be?

As stated above, we do not support an exemption for small retailer.

**Question 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?

If no, what do you think would be a more appropriate phase-out period?

- a. two months
- b. nine months
- c. one year
- d. other (please specify)

We consider a phase-out period of six to 12 months would be appropriate and provide sufficient time for retailers to plan for the change.

**Question 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?

Please consider both monetary and non-monetary costs and benefits (those that can be measured by money as well as those that can't).

Yes, we agree the benefits are likely to exceed the costs of phasing out single-use plastic shopping bags. In our view, the benefits are likely to be greater if the ban includes bags up to 70 microns and applies to all retailers.

Countries that have implemented narrow bans (for example, only on large retailers, or only for lighter bags) have not achieved the waste minimisation outcomes they desired and some are now reviewing or amending the scope of their bans.

**Question 9**

Do you think that reasonably practicable alternatives to single-use plastic shopping bags exist in New Zealand?

If no, what do you think is missing currently that would need to be available?

As stated above, we think there are reasonably practicable alternatives to single-use plastic shopping bags. The high proportion of consumers who are already choosing alternatives indicates shoppers are easily able to find options to suit.

**Question 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)

- a. voluntary incentive schemes by individual retailers
- b. national information campaign and mobile phone app for shoppers
- c. other (please specify)

We would support funding being provided for a national information campaign. Retailers' incentive schemes (e.g., a discount for using a reusable bag) can also be a useful way of encouraging reuse.

