

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

Lynn Edmond Smiley

Reference no: 1048

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

I am in favour of the phase out because single-use plastic shopping bags are: a) a product that lasts indefinitely so using them once or even twice is a gross waste of scarce resources b) they are an environmental hazard, particularly the ease with which they can be diverted from the waste stream and enter marine ecosystems c) they can be easily replaced with other solutions d) they are an easy place to start with in terms of reducing plastic waste and heightening public awareness of waste issues.

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 phase out must be of bags of sufficient thickness so that any thicker plastic alternatives that remain in use are too expensive to be simply used and discarded resulting in even more plastic going to landfill. The thicker the bags are that are not phased out the longer they should be able to be reused. Also, the thicker the bags that are phased out the more alternatives bags not made of plastic (cotton or paper) can compete on a cost basis with plastic bags that are not being phased out.

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

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

There should be no exemptions. Exemptions weaken the effectiveness of any phase out and create additional compliance and enforcement costs.

Clause

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?

Notes

If smaller retailers were exempt (which I do not agree with) then the number of full-time equivalent employees should be two or less, provided employees for the exemption include partners in partnerships, shareholder-employees and beneficiaries of trading trusts.

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

Although, I would prefer a shorter time frame of three months. Measures such as this are long overdue and the environmental impacts to the oceans so severe that further delay should be avoided at all costs.

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

In my opinion, the long-term non-monetary costs of not doing anything will outweigh the short-term monetary costs.

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

Alternatives have been used in my family for close to a decade. These comprise cotton and other permanent reusable shopping bags. More recently, there has been an increase in alternatives being marketed and distributed for free (eg, boomerang bags).

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

voluntary incentive schemes by individual retailers

Notes

The absence of the easy access to single-use bags once banned will slowly encourage more use, but retailers should also capitalise on the opportunity to show they are good corporate citizens by offering incentive schemes.

Clause

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

Notes

Probably, nothing as we have pretty well adjusted already. However, inevitably there will be times when we forget to take reusable bags with us and this is the opportunity that retailers could voluntarily capitalise on by offering alternatives.

Clause

12. How can data on single-use plastic shopping bags and other single-use plastics entering the market and monitoring of reductions be improved?

Notes

No ideas, sorry.

Clause

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

Notes

I am uncertain why the proposal is to only introduce regulations to prohibit the sale (including the distribution) of single use plastic shopping bags when s 23(1)(b) of the WMA also permits such regulations to also prohibit the manufacture of such bags. It does not appear that there is extensive manufacturing of such bags within New Zealand so the economic effect of banning the manufacture of bags would appear minimal (and, as not all plastic bags are being phased out, manufacture of non-banned bags would seem possible). It may be thought that prohibition against manufacture would be unnecessary given there would presumably be no market for the bags once they are phased out. However, it would be inconsistent with the intention of this initiative if New Zealand permitted the manufacture and export of these bags that are seen as not fit for sale within New Zealand. Also, the measures do not go as far as prohibiting the importation of the bags, although I appreciate this would appear to require an amendment to the WMA. I suggest that the WMA is reviewed and given more wide ranging effect, such as the ability to ban the importation of products, if necessary.