

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

Reference no: 1148

Submitter Type: Business / Industry

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

No

Notes

Associate Environment Minister Eugenie Sage told RadioLIVE on Tuesday 6th June, 2018 that supermarkets and other large retailers are responsible for about 75% of the bags that are used across New Zealand each year but for that other 25% it needs action from Government". Given this statement the introduction of the mandatory phase out of bags is for 25% of single use bags. Taking this into context we disagree with the mandatory phase out of the sale or distribution of single use plastic bags. In reviewing the consultation document the mandatory phase out of single- use plastic bags has been proposed as the No 1 option because it has been ranked the highest option according to Appendix 3. Table 8 has question marks throughout it and yet this table is the basis for why this option vs others is being proposed. This makes it difficult to agree with an option where there is no real data to compare to. The main reasons given for proposed mandatory phase out are around the impact they have on the marine environment. A large amount of data referred to in the consultation document, refers to world wide figures and include the fact the majority of plastic waste comes from 10 large rivers in the world. According to the NZ statistics in Figure 1 plastic bags do not have the greatest impact on the NZ marine environment. The proposed mandatory phase out is a micro solution for a worldwide macro problem which will have little, if any impact, on terrestrial and marine environments of NZ, let alone the world. The objectives are not specific enough, nor do you think they are measurable when you ask for better ways to measure them in Question 12. Governments should look at environmental issues and waste minimisation as a whole and not piecemeal. Thinking that "We need to start somewhere" or making people "feel good" should not be the reason to introduce this mandatory phase out. The outcomes of the proposed mandatory phase become so small, the question should be asked "If it wouldn't be more effective overall to reintroduce a 'Keep NZ Beautiful' campaign or 'fines for littering' to make a difference to marine litter"?

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

Other (please specify)

Notes

There are two points to make with the thickness of plastic bags: 1) What micron will meet the waste minimisation goal or incentivise the public to reuse? Overseas examples would seem to say there is none. For the public it will fall back to the decision of "convenience vs cost". 2) What is good for the circular economy? Plastic can be recycled or burned for energy. Therefore the thickness is irrelevant. If the government is committed to a circular economy then it would be more effective, and the outcomes could be easily measured, for the Government to invest in recycling plants for post consumer plastics or burn for energy (e.g. Like Europe).

Clause

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

Position

Yes

Notes

If this option is chosen then see list of exemptions in the UK legislation for single use plastic bags. It is well documented that consumers are not cleaning reusable bags and therefore they will create a health hazard long term.

Clause

3a. If yes, what are they and why should they be exempt?

Notes

See notes in question 3.

Clause

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

Position

Yes - 50 microns or less in thickness

Notes

Hi-Tech Packaging are importers of flexible packaging and this includes branded bags for retailers. This also includes being the main supplier of reusable bags to Foodstuffs.

Clause

4a. If yes, please explain how a phase out would be likely to impact on you.

Notes

Our customers have been requesting more sustainable options for carrier bags for a number of years and we are able to supply all types. The impact of phasing out bags will be a positive one for us, as alternative options will cost the retailer more. Hi-Tech Packaging have researched the various options and their environmental impact and graphed these to assist our customers when making their decision on carrier bag options. When assessing various options and all environmental impacts (not just litter and marine environments) plastic and compostable bags remain some of the better options as long as it is recycled or composted. In summarising the various options, there is no one answer that is the best, as it depends on what environmental factor is taken into account. The studies outlined in Appendix 2 of the consultation document refer to a NWPP bag having to be reused at least either 33 or 52 times to have less impact than a single use LDPE bag. This is the question that needs to be asked, "whether or not the alternatives will be used (on average) more times than this to make a real difference?".

Clause

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

Position

Yes

Notes

The alternative options will cost these retailers too much and consumers are unlikely to bring a reusable bag with them.

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

20

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

No

Notes

Too soon for imported stocks of goods to be used up by the retailers. This would then involve costs for the retailers.

Clause

7a. If no, what do you think would be a more appropriate phase-out period?

Position

one year

Notes**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

No

Notes

Definitely not. Even your own consultation document can not define the benefits of the phase out nor can you work out ways to measure the benefits. We can assess current monetary cost and their alternatives. If thickness of a bag is tripled then so will the cost to the consumer and reusable bags have to be used numerous times (Some studies say up to 104 times) before their environmental impact is less than a single use LDPE bag.

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

As previously noted Hi-Tech Packaging can and do import reasonable practical alternatives.

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

People don't like being told what to do. And therefore they respond better to a "carrot" rather than a "stick" approach. E.g. Farro Fresh experiences with single use plastic bags

Clause

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

Notes

If we thought it was worth it, cost benefit analysis, we would happily adjust, but we don't. We currently reuse most of our "single use" bags for lining bins, the dog, for taking items to give to people, wrapping things in before disposing of them, to collect rubbish etc.

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

All the retailers can provide you with this so that should be easy and it will sound good in terms of quantities but what will the actual benefit be to the marine environment.

Clause

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

Notes

Please "Think Big" on solution for the NZ environment. It is the government responsibility to do so. Use actual numbers to determine the best outcome for NZ. Fill the gaps where industry won't because it is not commercially viable. Talk with our waste management companies who have researched this. Don't introduce this mandatory phase out of bags just for political reasons, as the environmental reasons are negligible. And don't choice Option 1 because this can be fast tracked and doesn't require legislation. Most New Zealanders want to have a 'Clean Green' NZ. Don't punish the silent majority with inconvenience and extra costs because of the few who don't care enough and litter our beautiful country.

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