

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

Reference no: 1220

Submitter Type: Local Government

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

The councils that make up the Taranaki Solid Waste Management Committee (New Plymouth, Stratford and South Taranaki district councils, and Taranaki Regional Council) support the proposed phase out of single-use plastic shopping bags. There are currently no options to recycle single use soft plastics (including single use plastic shopping bags) in Taranaki, so these are currently ending up in landfill, contaminating recycling collections or accumulating in the environment as marine litter. There are also limited options for on-shore recycling of single use plastic bags and the feasibility of recycling these off-shore is significantly compromised at present due to the impact of China no longer accepting these plastics in the current form. While this is not the only type of single use plastic that needs to be dealt with appropriately, it is a good first step. The phase out focuses on reduction of waste and environmental harm aligning with the waste hierarchy. We also support the inclusion of oxo-degradable, biodegradable and compostable plastic bags as this makes the change simpler to communicate and implement.

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

We support the inclusion of all single use plastic shopping bags less than 70 micron in this proposal. We would like to see New Zealand move away from disposable (single use) options where practicable, encourage multi-use of bags and adopting a cradle to cradle approach, and having a higher micron threshold means the ban is more likely to achieve the goal of reducing single use bags. The government could provide guidance to retailers what types of bags would be suitable replacements with particular consideration to: * The desirability of offering bags made from recycled material and where possible recycled New Zealand materials * What the potential end of life disposal solutions are for different types of bags and if they can be recycled, whether they can be recycled in New Zealand or only off-shore. * What the environmental impacts of different types of reusable bags are. We would recommend that the government encourage retailers to avoid bags made from composite materials e.g. jute bags with plastic linings or paper bags with rope and ribbon handles as these items need to be disassembled by consumers to be recycled. While we support 70 microns, we agree that there still needs to be affordable options for both retailers and customers. For a cradle to cradle approach, it may be worth investigating in the medium term to establish New Zealand infrastructure that can accept soft plastic to use in the manufacture of multi-use bags.

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

As there are a number of alternative options we do not see the need for any retailers to be exempt. Any increased costs that are incurred by retailers could be passed on to customers through a charge for a reusable bag at time of purchase if required. Information is needed for both retailers and importers to transition to a single use plastic shopping bag ban, but perhaps more support/a higher level of engagement is required for smaller businesses where cost of alternative reusable bags would have a bigger financial impact. It may also be an opportunity to engage with retailers and the general community on the best alternatives to single-use plastic bags so that the intent of the ban is realised. I.e. most environmentally friendly alternatives, avoiding compound materials such as jute bags lined with plastic.

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

There is difficulty in determining when an exemption would apply and given the alternative options available it is not necessary to apply exemptions.

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

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).

Notes

There are tangible benefits such as less marine litter and cleaner environment (reduced waste collection costs) and wastage of resources, but these will be small initially. However this ban should be considered as the first step towards reducing waste. The benefits will come as the community transitions to a waste reduction focus with further initiatives. More resource efficient production (cradle to cradle approach as opposed to current linear system - by using recycled materials saving virgin resources), more sustainable resource use (sourcing natural materials from NZ or recycling other recycling/waste streams - recycled PET/PP bags) - The cost of phasing out plastic bags include the cost of providing alternative reusable bags (stock/marketing), and unintended costs i.e. some supermarkets have already seen their customers stealing baskets and trolleys. This could be mitigated through better national educational campaigns with simple messaging. It is also important to do some research with the public to find out what the barriers will be for them and then do some messaging e.g. talking to dog owners and promoting alternatives for picking up doggy doo; what to use as bin liners or how to go liner free.

Clause

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

Position

No

Notes

Clause

9a. If no, what do you think is missing currently that would need to be available?

Notes

Currently there are no New Zealand made bags on the market which are made from 100% recycled plastic despite such bags being produced overseas. There are also no New Zealand made paper bags on the market currently. Stimulating investment in these kinds of bags could close the loop for bag production and reduce the carbon footprint. We would recommend that the MfE conducts a New Zealand lifecycle analysis on single-use plastic bag alternatives, so that retailers and consumers are clear on the full life cycle impacts of the possible options. The Ministry should then also investigate what kinds of bags are currently on sale in New Zealand or are being imported from China and if suitable alternatives do not exist in New Zealand use the next Waste Minimisation Fund to encourage investment in this area.

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

Clause

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

Notes

A national campaign with a simple message could be a good method of engaging with consumers and supporting their transition to a life without single use plastic bags. Research with the public could highlight the barriers for them to make the transition to and then a focus on some messaging could alleviate their concerns about alternatives e.g. talking to dog owners and promoting alternatives for picking up doggy doo; what to use as bin liner or how to go liner free.

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

Given the current uncertainty of the total number of single use plastic bags imported into NZ (absence of unit count and weight data), any packaging material that is produced or imported into NZ (above an undetermined volume/\$ value threshold), should be quantified and reported on via weight and unit count measures as well as dollar value. This would enable the establishment of a circular economy approach to recycling and product stewardship schemes that can then report on total material flows for each packaging type as they enter and move through the NZ economy. This information would also enable the government to focus on successive targeted material types that have the greatest environmental harm reduction potential, working with all stakeholders in moving towards a circular economy.

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