

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

Reference no: 5702

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

Strongly agree. I support the most ambitious timelines possible for the phase-out, with narrow exceptions available and only on a transition basis. I support the phase-out's scope including all aspects of the supply and use chain for single-use plastic shopping bags, including their production, distribution, import, and sale. I believe the mandatory phase-out of single-use shopping bags should be the first step in a series of similar phase-outs for single-use plastic products across the consumer (including tobacco), industrial, manufacturing and hospitality sectors. Government policies and initiatives should push for a more circular model of design and production for plastics. The phase-out should include degradable plastics. These tend to confuse consumers as to being a "green" alternative. In reality, these will not degrade in landfill conditions, nor in water-ways or the ocean, where they will likely end up. Rather, these materials only actually degrade in specific commercial compositing environments (which aren't readily available in NZ). The phase-out should occur in parallel to other government mandated initiatives regarding waste processing/recycling, redirecting plastic away from landfills, as well as efforts to clean up the environment. Initiatives to address the post-use impact of single-use plastics should have a broad scope. They should focus on adverse environmental effects of ALL single-use and/or avoidable plastics, packaging and Styrofoam, rather than merely the environmental impacts of single-use plastic bags. Any exceptions to the phase-out should be limited term, very transparent (including publicly announcing the company names, reasoning provided by the applicant, government reasoning for granting the exception, as well as the volume of single-use bags permitted under the exemption), as well as given only as a transition mechanism, rather than on an indefinite basis.

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

I support the most ambitious thresholds possible, so 70 microns thickness at a minimum but preferably higher. Potentially, the initial limit could be set at 70 microns, with this thickness legislated to increase after a certain period. Legislators should structure the roll-out with the specific intention of ensuring it can be expanded to phase-out as many single-use plastic products as possible over the short-term (beyond plastic carrier bags alone). The phase-out should be actively policed and/or involve an ability for the public to report suspected violations. Community participation and ownership of their environment will be essential to achieving the phase-out's goals. A simple mechanism for reporting violations will allow the public to express their view that violations will not be tolerated. It will also be influential in shifting retailer behaviour. A public reporting mechanism should be structured to mitigate abuse though. If the public reports a suspected violation, the onus should rest with the party which profits from a product (the retailer) to show that their plastic bags conform with the letter and spirit of the phase-out. Financial fines should apply for violations, with these escalating for continued or repeated violations. I believe the phase-out should also consider other factors besides a product's thickness. Rather, the "single-use" aspect should also be a key consideration in determining which products are phased out. That is, if a product is technically over the permitted thickness threshold, but still has an intended life-cycle which is in effect "single-use", this product should also be phased-out. In parallel to the phase-out, the government should apply effort and resources toward informing and supporting entities which currently use single-use plastic shopping bags. Efforts should focus on education about: - The adverse effects of the products (so that they understand the reasoning of the ban and can support efforts to educate recalcitrant consumers), - Alternative environmentally friendly alternative products, as well as where to source these. The system should be structured so that on balance, simply complying with the phase-out should outweigh the compliance costs for obtaining exemptions, or the risks of financial fines for violations.

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

Exemptions should exist, but as a transition mechanism only. The exemption application process and government decision should be transparent, with all information readily available to the public. That is, the public should have easy access to the applicant's full

reasoning provided, the volume of single-use plastic bags which are exempt, as well as the government's reasoning for granting the exemption. Commercial sensitivity should not be accepted as a valid reason for requesting confidentiality during the process. Exemptions should be granted for a finite term and be a transition mechanism towards full compliance. I believe that exemption applications should require applicants to provide concrete and measurable undertakings about the positive actions which the applicant will take (which are not already being undertaken) to deal with the post-use environmental impacts of single-use plastic bags. That is, details of what the exemption applicant will do to clean up or recycle these bags, or actions which will benefit the environment in some other way. Exemption applications should detail how each applicant will transition towards full compliance, with clear timeframes. Perhaps, a scheme can be established vaguely similar to the Emissions Trading Scheme, whereby parties which wish to use single-use plastic bags (under an exemption) could purchase units in a fund. The fund would be used to support recycling initiatives, R&D or innovation efforts to develop alternatives to single-use products. The units available would reduce over time or increase in cost. The exemption scheme's administration costs should be borne by the applicants themselves, irrespective of whether their exemption application is successful. The financial costs of exemption applications and ongoing compliance obligations for maintaining an exemption should be structured to encourage entities to simply phase-out single-use plastic bags, rather than pursuing exemptions to the ban. I support the plastic pollution levy proposed by Greenpeace New Zealand.

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

Strongly disagree. Collectively, these smaller retailers represent a significant volume of single-use plastic bags and are one of the most regular points where consumers receive/accept such items. Therefore, I believe an exemption for small retailers both contradicts and undermines the spirit and intention of the phase-out. I believe such an exemption will confuse consumers. I believe a blanket ban with a narrow and onerous exemption mechanism will be more effective in shifting behaviours, as well as supporting the growth and commercial viability of end-of-life infrastructure (such as recycling/processing facilities, or clean-up efforts to address existing negative impacts).

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

They should not be exempt, for the reasons explained above.

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?

Notes

I agree with six months as a realistic lead-in time. However, I would also support any efforts to reduce the times so that the phase-out becomes effective as soon as possible. For instance, caps on the consultation period.

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

Strongly agree. One of New Zealand's primary industries is tourism, which is inherently linked to our "clean and green" image, which our natural environment allows us to have. Neither retailers nor consumers should not be permitted to indirectly undermine this pillar of the natural economy for pure convenience, when viable alternatives exist. While plastic bags represent a relatively small portion of overall pollution, this is an opportunity for New Zealand to take a step in a more positive direction in this respect, among the world leaders for environmental protection. The plastic bag phase-out should be the first in a series of similar phase-outs for single-use plastic products. It represents an economic opportunity for New Zealand businesses to keep up with the world in developing and scaling alternative products, to export globally as other countries inevitably also take similar steps. According to the UN, more than 60 countries have introduced bans and levies to curb single-use plastic and Styrofoam waste so far*. Therefore, New Zealand must move now to keep up with the front edge of these developments. The phase-out's administration costs should be put onto the retailers themselves as far as possible, with incentives or discounts to encourage timely and complete adoption of the phase-out. Retailers should be discouraged from passing compliance costs through to consumers, as far as possible. For instance, a transition mechanism could reward "good" companies with a capped rebate to partially compensate for the difference in costs between (non-compliant) single-use plastic bags and (compliant) post-ban alternatives. Such a mechanism could be funded via fees gathered from

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

Strongly agree. Planned government support for R&D, commercial scaling and information dissemination is essential. Many alternatives to single-use plastic bags exist currently, ranging from paper bags through to libraries of re-usable bags (often found at farmers' markets). However, I believe the solution involves a flexible and multi-pronged approach, to accommodate the creativity and community-specific approaches which will inevitably emerge in response to the phase-out. Given the phase-out is being made on a mandatory basis, the government has an obligation to ensure sufficient alternatives exist at a reasonable cost and scale, plus retailers are sufficiently informed about where and how to access these alternatives. All efforts should be taken to avoid retailers passing any increased costs through to consumers. I believe a government scheme ("Support Scheme") should be established to support efforts to develop and scale-up efforts and initiatives which will move to fill the void which single-use plastic bags will leave for many people. The Support Scheme should be established quickly, so as to be active before the ban is effective and support preparation for the ban's enforcement date. The Support Scheme could potentially offer low or no interest loans, and/or grants to support infrastructure investment, R&D, or the many other varied operational costs associated with a rapid production increase. The Support Scheme should be flexible enough to benefit applicants which represent many different "prongs" of the collective replacements to single-use plastic bags. The overarching theme could be that an applicant must be working to prepare for the ban's effective date and develop alternatives for consumers in the post-ban world. The Support Scheme should be open to a range of applicants, ranging from individuals and community groups, through to larger commercial enterprises. To mitigate financial risks and possible abuse, loans/grants from the Support Scheme could potentially incur interest or a repayment obligation if the applicant fails to sufficiently meet the goals which were put forward in their application within a specified period. Another alternative to support accountability could be to have information publicly available about all applications to the Support Scheme and resulting loans/grants.

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

I believe that removing the single-use alternative completely will naturally lead to the adoption of multiple-use bags. Where an exemption has been granted which allows the use of single-use plastic bags, these bags could have a minimum fee attached at the point of sale, to further discourage consumers. Potentially, plastic bags which fall within an exemption could be subject to a "plain packaging" rule (i.e. no store branding) and/or contain a warning, similar to tobacco products.

Clause

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

Notes

We already decline single-use plastic bags in favour of reusable bags. Notably though, checkout operators still often bag groceries by default and customers have to remove groceries and hand the single-use bag back. This includes experiences at supermarkets which have made public statements about their commitment and actions to phase-out single-use plastic bags.

You have elected to withhold your personal details from publication.