

Proposed Mandatory Phase Out of Single-use Plastic Shopping Bags,
Ministry for the Environment,
PO Box 10362,
Wellington 6143

20/08/2018

Dear Associate Minister for the Environment Eugenie Sage,

PLASTIC BAG BAN CONSULTATION

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 (e.g., oxo-degradable, biodegradable and compostable) plastic?

Yes.

The Waipā district is fortunate to have the great Waikato and Waipā Rivers bordering and crossing our district. The Waste Minimisation team understand plastic bags that become litter on land can travel to the sea via these rivers. We see a phase out of plastic bags at point of sale as a way to make a large impact on the number of these bags becoming loose in our environment and polluting New Zealand's marine and land environments.

The Waste Minimisation team understand the scale of the problem. A recent waste audit of Waipā's rubbish found that plastic materials comprised 15% of the domestic kerbside refuse; plastic bags and film comprised 59% of that plastic material waste. In our district, waste services are market driven, so our community are paying to send these plastics to landfill.

The Waste Minimisation team encourage the mandatory phase out to include oxo-degradable, biodegradable and compostable bags as many locations around New Zealand, including the Waipā district, do not have access to commercial composters. Not excluding these types of single-use bags would also add a great deal of complexity for the consumer to understand what type of bag they have gotten from a retailer and what is the correct way to dispose of it.

The Waste Minimisation team support the point made in the consultation document that the alternatives are relatively accessible (physically and financially) to most people and reducing single-use plastic bags is an appropriate first step to address New Zealand's throwaway culture.

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?

- a. ~~less than 50 microns in thickness~~
- b. less than 70 microns in thickness
- c. ~~other (please specify)~~

We would support the phase out of bags of less than 70 microns in thickness. This policy is a great time to legislate for a strong change and we encourage the Ministry to take the New Zealand public as far as possible in one policy change, rather than to allow non-ideal alternate bags to continue to be on offer. Those alternate bags may require further policy changes in the near future. We need to ensure that the alternate bags on offer are seen as different from current single-use options, and as such they are valued more by the customer; therefore are more likely to be seen as a bag to be used many times.

Recent experience (as reported in this consultation document) in Tasmania and the ACT Territory (*"there have been reports of shoppers buying heavier-weight bags but treating them as single-use bags"*) and in Europe (*"...chose a cut-off point of below 50 microns in bag wall thickness.... These bags were less frequently reused than thicker plastic carrier bags.*) show that allowing thicker (<35 and >70 microns) plastic bags does not ensure they are bags that will be reused many times as intended.

Question 3

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

No.

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?

No.

Question 5

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

No.

Government research showed both England and Hong Kong eventually included smaller retailers in their charge-based system. It seems prudent to include them from the start in New Zealand. A smaller retailer will issue a smaller number of bags, so their issues are on a smaller scale. With larger retailers leading the way, there will be many alternate reusable bag products available for smaller retailers to take advantage of. Litter (including plastic bags) from smaller retailers such as takeaways and dairy's is noticeable in our street bin and litter collections. If these smaller retailers are exempt, the cost to clean up and contain these plastic bags would still sit with local councils.

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?

Less than 50 people. If a business has a staff of 50 people, they have the staff capacity to seek appropriate alternates to single-use plastic bags, given sufficient lead in time.

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?

No.

Why not?

Six months is a very short space of time to allow retailers and the public to go through a process of change. Some people will need a little bit longer to accept that things have changed. Allowing a little more lead in time will allow more people to be accepting and ready for change. We acknowledge there will always be a small proportion of people who will never be ready and will only change on the day there is no single-use bag for them to use.

Allowing a little more time will mean a longer conversation can be had with New Zealanders to prepare for the change and we can take them on the journey with us. Retailers will then have adequate time to prepare signage and other tools to help remind their customers to bring their bags or plan similar initiatives to support their customers to change their behaviours.

This will also allow the Ministry to work on supporting needs and enforcement e.g. if people continue to give bags away, what will happen.

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)~~

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?

~~Yes / No /~~ Not sure

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).

Monetary - Unable to answer due to lack of information on the financial cost.

Non-monetary - There are clear environmental benefits from removing single-use bags from use in New Zealand. There is a high chance that more positive changes around increased waste minimisation behaviours and choices could follow on from this one change (over time). Yet there is not clear information to quantify this.

Question 9

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

Yes

Many of large supermarkets in New Zealand are already offering reusable bags at a low cost (e.g. \$1 per bag). With an appropriate lead in time and potential for other reusable bag alternatives to come to the New Zealand market, businesses and their customers are able to plan ahead and get the bags they need at a fairly low cost. Using a free cardboard box is always an alternative option.

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)

The environmental impact of bag production needs to be included in the conversation to allow consumers to choose their reusable bags with this knowledge. A simple strategy could be requiring the average number of times a bag needs to be used (to offset the environmental cost) to be printed on the bag.

We would like to see [community-based social marketing](#) techniques used in this campaign to increase the likelihood of behaviour change.

These techniques focus on identifying barriers and benefits in order to target the campaign-strategies effectively. Community-based social marketing offers a suite of strategies that have all been proven to increase the likelihood of people to take action and change a behaviour. Several of these could work really well to help customers remember to bring their reusable bags into the store. For example:

- Prompts that remind people to act. e.g. signage in a car park or at home so people remember to bring their reusable bags.
- Social norms, building community support. Seeing other people bring their own bags creates a new norm for the community.
- Social diffusion, speeding adoption of a new behaviour or habit. Many decisions we make are influenced by friends, family members or co-workers.
- Convenience, making it easy to act.

Utilising these tools or using community-based social marketing to design the Government-led communication around this issue would be a great way to increase the acceptance ahead of the phase out date.

Question 11

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

See above re community based social marketing tools.

Question 12

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

We have no expertise to offer here.

Question 13

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

We would like to see a provision created in the legislation that allows for other single-use items such as straws to be considered at a later date. This gives New Zealand the opportunity to maximise this legislation, with single-use plastic bags only the first step in a much wider discussion.