

# Submission to proposed mandatory phase out of single-use plastic shopping bags

**Submitter: Zero Waste Network**



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Submitter type: NGO

## **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**

We fully support the mandatory phase out of SUPBs including those described as 'degradable', with no exemptions. Plastic is plastic. Let's get rid of any unnecessary plastic.

## **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**

SUPBs of any thickness are not “environmentally friendly alternatives to single use plastic bags” and thicker SUPBS do not offer an opportunity for a “transition to a circular economy.” SUPBs of over 70 microns are currently downcycled. If they are to be recycled into SUPBs in the future, additional virgin plastics will need to be added to ensure material integrity, and non-intentionally added substances will also be introduced during the recycling process. These are additional toxins we do not want in contact with our soil, water, air, and marine and freshwater ecologies. Recycling is also an energy-intensive industry. The Zero Waste Network advocates a move away from recycling wherever possible and a greater focus on prevention, reduction and waste elimination.

**Clause 3.**

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

**Position (Other)**

All SUPBs should be banned, particularly the thicker options which take longer to break down (more likely to cause physical harms to fauna), contain more fossil fuels, use more energy to produce, contain a higher volume of toxins, and adsorb and carry more POPs into the food chain than thinner plastic bags. Thicker bags will simply use more oil to make and many people will just use them once and discard them. If people can remember to bring a 70 micron bag to the supermarket to reuse it, they can remember to bring a cloth shopping bag to the supermarket or otherwise to reuse it. We don't need to keep producing single use plastic.

**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****Clause 5.**

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

**Position**

No

**Notes**

The plastic bags distributed by smaller retailers have the same environmental and human health impacts of larger retailers. We support the position that all retailers are covered in the ban regardless of size. A plastic bag is a plastic bag. Many smaller retailer's bags are too small to be reused as rubbish bin liners for a standard 10 litre rubbish bin in a house or office. Many of these small bags are simply discarded after one use.

**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**

Small retailers should not be exempt. The idea is to get rid of all single use and unnecessary plastic. While you are phasing out plastic bags, why not unnecessary items like straws, cutlery and plastic plates. These are all single use and there are compostable and reusable alternatives.

**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**

More time may be needed to build in the subsidization of robust, long-life, plastic-bag alternatives for those who struggle to invest in a set of these - particularly in cases when householders must purchase weekly shopping for large/extended families on minimum wage.

**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**

Retailers will benefit as they no longer need to provide "free" plastic bags. The costs of inaction by far outweigh those of prevention. The long-term benefits to the environment are priceless, and we commend you for initiating the process. According to what the Minister is saying in the media, *"there will be more plastic than fish by weight in the world's oceans by 2050."*

This will have massive implications for our kai moana. Endocrine disrupting chemicals in the plastic and adsorbed to micro and nano plastics have been poisoning market fish species, and other tested marine and freshwater fauna for decades.

SUPB pollution also transports invasive species and pathogens. This means that our marine and freshwater industries such as fisheries and aquaculture are under serious threat. It is up to the NZ government to stem the flow of plastics into our biosphere and an SUPB phase-out is one small but significant step in the right direction.

Research shows that up to 20% of the world's oil production will be used in plastics production by 2050 and a recent study shows that plastic pollution emits ethane and methane - evidence of strong correlations between climate change and plastics production.

The Zero Waste Network agrees with other organisations that there is no price that we can put on the impact single use plastics like SUPBs will have on NZ's greenhouse gas emissions, depleted fish stocks, damage to human and non-human endocrine systems, and the death of hundreds of seabirds and marine mammals every year. The damage to NZ's reputation as a signatory to the Kyoto Protocol and a clean green 100% tourist destination will also be difficult to put a price tag on. Tourism is now our biggest earner and they are coming to this country to enjoy the pristine environment. Let's help them see just that.

**Clause 9.**

Do you think that reasonably practicable alternatives to single-use shopping bags exist in New Zealand? Why/why no?

**Position**

Yes

**Notes**

It has been happening for years and the majority of people want the change. Many consumers in Aotearoa already use reusable bags, bags made from recycled fabric (such as curtain fabric), kete, hemp bags, or those available at the supermarket. Small business can profit from producing and supplying reusable bags to consumers, thereby bolstering local economies.

**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. Almost every household in New Zealand already has reusable shopping bags. We believe there is enough evidence to make the case for reusable bags. They will reuse them if there are no other options. They can use a cardboard box, they can use anything. They'll be encouraged to bring their reusable bags after carrying their groceries out to their car in their arms. You won't have to do that too many times before you remember to bring your own bags. Until none are available, people won't remember.

**Notes**

Reminders to bring reusable bags through signage at hot spots (supermarket and retail car parks/bike stands/bus stops/on supermarket trolleys and baskets).

**Clause 11.**

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

**Notes**

Many families have adjusted already. Supermarkets have already announced it, so people have adjusted already. People have been shopping at Pak n Save and other supermarkets for decades and using their own bags. Although bags are available for purchase, 80% of people don't. This is not something new. Many people have been doing this for years. Financial support for community bag-making workshops. Reminder signage in supermarket and retailer parking areas and on shopping trolleys and baskets.

## **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**

We don't know of any New Zealand studies, so any would be better than nothing. A ban must include regular evaluation, monitoring, and public reporting (at least annually) by an independent agent or board. This should not be an industry group supplying information that is not independently verified. It should be mandatory for industry to share data (at pre-implementation phase). We need accurate and detailed data from the industry on the volume/numbers of plastic bags distributed/used before the ban and environmental baselines prior to the implementation of the ban to measure the impact of a ban on reducing pollution. The importation of SUPBs should not be allowed.

## **Clause 13.**

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

### **Notes**

The mandatory regulation of single-use shopping bags is a great start, and we thank you for taking a step in the right direction to curtailing our huge consumption of single use plastics. We would love to be involved where possible in implementing additional programmes that further reduce our dependency on plastic. The Zero Waste Network fully supports the national plastic pollution strategy proposed by Greenpeace and deposits on all beverage containers being proposed by Kiwi Bottle Drive. This includes a proposal to ban avoidable, unnecessary, toxic, and non-recyclable single use plastics; a nationwide container deposit scheme; a plastic pollution levy; national reduction targets and monitoring schemes; a refill nation and a New Zealand-led global international plastic pollution treaty.

We would have preferred to have seen a longer phase out with a levy as has successfully been implemented in Denmark, England, Scotland, N.Ireland and many other nations and states around the world. The independently managed environmental fund the SUPB levy would feed into would have been invaluable in building on our current soft plastics recycling scheme, in supporting clean-ups, in single-use plastics educational programmes, research and design for sustainable packaging alternatives, and to fund composting infrastructure and services for 'genuine bioplastics' and ecolabelling. This would also have generated funds to subsidise low income families. Denmark's levy resulted in the lowest plastic bag use in Europe, with 4 bags per person per year, while some other places with outright bans (not preceded by a levy as part of planned phase out period) are presented with challenges associated with black markets and enforcement. Given such a short phase-out period, this is no longer a viable option. Regardless, our position remains firm that a mandatory nation-wide ban is much better than the status quo and so we remain in full support.

### **Note of Thanks**

*The Zero Waste Network would like to thank **Dr Trisia Farrelly from Massey University** and the **New Zealand Product Stewardship Council** for assistance with this submission.*