

14 September 2018

Proposed Mandatory phase out of single-use plastic shopping bags
Ministry for the Environment
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New Zealand

Plasticshoppingbags.submissions@mfe.govt.nz

Re: Proposed Mandatory phase out of single-use plastic shopping bags

Thank you for the opportunity to comment on the above document.

This is a submission made on behalf of the Wood Processors and Manufacturers Association (WPMA), an organisation representing the views and interests of paper packaging manufacturers, users and recyclers.

WPMA is concerned that the Discussion Document and the proposed action, (a ban on single use, low micron plastic shopping bags with handles), reflects a pre-determined outcome. WPMA has no strong view for or against the proposed ban but is concerned the ban only indirectly relates to the (apparent) problem of plastic waste in the marine environment. On that basis the proposed ban could be characterised as an ineffectual and potentially costly response of little more value than giving the appearances of addressing an environmental concern.

WPMA does not dispute the reported seriousness of persistent plastic in the marine environment and the threat that plastic in its many different forms poses to marine life. That said, the characterisation of the risk of plastic shopping bags as litter and a marine pollutant in the report is superficial and circumstantial. The proposed ban may have merit in forcing consumers to consider the wider environmental implications of their purchasing decisions. It could also engender a sense of complacency thereby detracting from more meaningful actions.

WPMA consider the Consultation Document is a missed opportunity to examine in real depth the dynamic interaction between the many factors underpinning NZ's waste and recycling rates. As just one example, there is mention of (page 21) but no (reported) examination of the experience of grocery retailers who have for years offered consumers the choice of packing their purchases in containers supplied to them by their suppliers. The report's conclusion, the need for a ban on some forms of plastic shopping bag, gives those investing in recycling, packaging designers considering alternative forms of

primary and secondary containment and consumers more generally little incentive to consider the changes needed for long term sustainable solutions to emerge.

WPMA has a number of specific concerns with the Discussion Document. These are summarised below as an illustration of the need for better analysis for there to be real progress toward the aspirational goal of zero waste. In total they suggest the proposed ban will do little to meaningfully address concerns related to plastic litter, protection of the marine environment and per capita reduction in solid waste. As such the Consultation Document is a lost opportunity to foster meaningful discussion of the circular economy.

- Low micron plastic shopping bags make up a small proportion of litter by weight, volume and number identified in beach clean ups. They are acknowledged a very small proportion of the problem of plastic in landfill and by inference the marine environment when all other forms of plastic marine contaminants (including plastic micro-fibres) is considered. It is not established that the proposed bag ban will make any measurable improvement in the problem of coastal and marine litter. It is conceivable that targeting plastic shopping bags at source (rather than the smaller volume of bags ending up as litter) could see a change in the form and thickness of bag found in litter rather than a reduction in plastic in the marine environment.
- There is no discussion in the Consultation Document of the presumably ineffective policing of the Litter Act and or the RMA such that the problem of plastic in the coastal and marine area exists. There is no discussion of targeting those whose behaviour gives rise to litter of all types. There is no discussion of the merits and costs of other forms of marine plastic control such as filtering plastic waste from storm water before it is discharged.
- WPMA is concerned the proposed ban on plastic bags (or any other single item) resulted in a complacent attitude to other and more significant sources of marine plastic pollution, if that is the problem the ban is intended to address. The risk is that as a transitional measure, a bag ban does little to foster the Government's long-term approach to reducing the amount of plastic waste by taking "a circular economy approach" and "designing out waste, pollution, and greenhouse gas emissions."
- The stated commitment to a circular economy is not matched by an analysis of that context when applied to packaging. A circular economy requires keeping resources in use for as long as possible, extracting the maximum value from them whilst in use, then recover and regenerate products and materials at the end of each service life. As a concept, the circular economy presumably includes efficacious packaging that prevents spoilage and damage of goods in transit. It certainly includes the use of paper-based materials and packaging that are a store of greenhouse gas for the duration of their existence, can be reused and which are readily recycled and biodegrade at the end of its useful life as a package. Paper does not accumulate in the coastal and marine environment.
- The recognition in the Consultation Document (page 5) that "Government working alongside industry can be very powerful..." is supported. This consultation offers the opportunity to consider not just reinforcing existing industry initiatives with respect to plastic shopping bags but the wider interface between Government and manufacturers, recyclers and retailers more generally. The Packaging Accord QUANGO model worked effectively as a conduit for informed and in-depth discussion of waste minimisation and recycling prior to it being abandoned by Government in favour of direct regulation and the imposition of a tax on the weight of solid waste disposed of to landfill.

- The complexity of waste and recycling issues is underscored by the Consultation Document's recognition that Government's "main goals" in phasing out single use plastic shopping bags include "...avoiding undue costs on the community, business or public funds. It would also be desirable to minimise new legislation, encourage reuse or recycling, and generate funds to benefit communities or the environment." (page 6). The proposed ban on single use shopping bags does little justice to the breadth of Government's interest, with implications for the economic and environmental sustainability of the proposed solution.

Conclusions

The economic, social and environmental considerations inherent in most products requires a more considered approach than appears to have been applied by those preparing this Consultation Document. Clear elucidation of both costs and benefits of regulation, including of packaging products is not an unreasonable expectation.

While WPMA has no direct interest in single use plastic shopping bags our membership includes those offering alternative and arguably more sustainable solutions. The greater risk we perceive in the approach followed in determining to 'ban the bag' is that similarly simplistic approaches could be applied to other products and other forms of packaging.

If the Government's long-term objective is to foster "a circular economy approach" to design out waste, pollution and greenhouse gas then a genuine commitment to "working alongside industry" is to be encouraged. This will require Government and industry to better elucidate what is meant by waste, pollution and greenhouse gas and identify where those 'adverse effects' of resource use are not being adequately managed through prevailing legislative and regulatory frameworks including the Climate Change Response Act, The Resource Management Act, the Litter Act and the Waste Minimisation Act.

Yours sincerely

Chief Executive