



# Proposed mandatory phase out of single-use plastic shopping bags

## SUBMISSION FORM

The Government is seeking feedback on a proposed mandatory phase out of the sale or distribution of single-use plastic shopping bags.

For more information about the Government's proposals read our [Proposed mandatory phase out of single-use plastic shopping bags consultation document](#).

**Submissions close at 5.00 pm on Friday 14 September 2018.**

## Making a submission

You can make a submission in three ways:

1. Use our online submission form available at [www.mfe.govt.nz/consultation/plasticshoppingbags](http://www.mfe.govt.nz/consultation/plasticshoppingbags). This is our preferred way to receive submissions.
2. Complete this submission form and send to us by email or post.
3. Write your own submission and send to us by email or post.

## Publishing and releasing submissions

All or part of any written submission (including names of submitters) may be published on the Ministry for the Environment's website [www.mfe.govt.nz](http://www.mfe.govt.nz). Unless you clearly specify otherwise in your submission, we will consider that you have consented to website posting of both your submission and your name.

Contents of submissions may be released to the public under the Official Information Act 1982 following requests to the Ministry for the Environment (including via email). Please advise if you have any objection to the release of any information contained in a submission and, in particular, which part(s) you consider should be withheld, together with the reason(s) for withholding the information. We will take into account all such objections when responding to requests for copies of, and information on, submissions to this consultation under the Official Information Act.

The Privacy Act 1993 applies certain principles about the collection, use and disclosure of information about individuals by various agencies, including the Ministry for the Environment. It governs access by individuals to information about themselves held by agencies. Any personal information you supply to the Ministry in the course of making a submission will be used by the Ministry only in relation to the matters covered by this consultation. Please clearly indicate in your submission if you do not wish your name to be included in any summary of submissions that the Ministry may publish.

## Submission form

The questions below are a guide only and all comments are welcome. You do not have to answer all the questions. To ensure others clearly understand your point of view, you should explain the reasons for your views and provide supporting evidence where appropriate.

### Contact information

Name*	Jessie Scurr
Organisation (if applicable)	<a href="#">Click here to enter text.</a>
Address	
Phone	
Email*	

Submitter type*	Individual	<input checked="" type="checkbox"/>
	NGO	<input type="checkbox"/>
	Business / Industry	<input type="checkbox"/>
	Local government	<input type="checkbox"/>
	Central government	<input type="checkbox"/>
	Iwi	<input type="checkbox"/>
	Other (please specify)	<input type="checkbox"/> <a href="#">Click here to enter text.</a>

\* Questions marked with an asterisk are mandatory.

### Questions

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?

- Yes
- No
- Not sure

Why / Why not?

I agree with the proposed mandatory phase out of the sale or distribution of plastic shopping bags in New Zealand. Plastic bags are durable and long lasting, and the impacts of plastics are undeniable. When they are not piling up in landfills, they are either blocking storm drains, getting stuck in trees, littering streets, and a very advertised impact of contaminating the

oceans. Plastic in the ocean impacts marine animals in ways of consumption and getting tangled up in them. Protecting and sustaining our natural environment is a very important to me. As it should be to every New Zealander. Hearing predictions that by 2050 the plastics in the ocean could outweigh the fish is frightening (Ocean Conservancy and McKinsey Centre for Business and Environment, 2015). Banning plastic bags is only a small portion of the plastics in our oceans but it is a start to trying to ban plastic completely and finding more environmentally friendly options. New Zealand promotes its clean green image and being 100% pure New Zealand. These can't just be words, they need to be actions. Banning plastic bags is an action towards a cleaner and greener New Zealand. Plastic bags are a part of most people's everyday life. Educating and enforcing people to use alternatives options for plastic bags will also increase their attitudes in reducing their use of other plastic materials.

A key point in this question is 'including those made of degradable (eg oxo-degradable, biodegradable, and compostable) plastic'. I often would see plastic bags advertised to be degradable and It would make me feel good about using them as I thought they would have less impact on the environment. However, I found out this was not true. As stated in your consultation document evidence suggests that these bags require specific artificial environments, such as high-temperature controlled composting, to completely break down.

Using alternative approaches to plastic bags is a start to New Zealand becoming a circular economy rather than a linear economy. A linear economy is energy from finite sources, where we take, make and dispose. A circular economy is energy from renewable sources, where we make, use and return. This approach is a step to phasing out our throwaway culture and transforming to a circular economy.

Plastic bags have captured the attention of the media and the public in New Zealand over recent years. Petitions show strong support in the banning of plastic bags. Banning plastic bags have worked in overseas examples and show that it will work in New Zealand as well.

Plastic bags should be banned to reduce our litter into the environment and reduce the risk to marine ecosystems and human health.

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?

- less than 50 microns in thickness
- less than 70 microns in thickness
- Other (please specify)

The thinner the bag the less resilient to wear it is. Therefore, it is more likely to be used for single use only. As the consultation document states the thinner the bag, the easier it is to be caught by wind and water and thus disperse into the environment. I strongly believe that plastic bags under 70 microns in thickness should be banned. Plastic bags under 50 microns are usually single use or can only survive a couple more times being used. Bags between 50 and 70 microns are stronger and thus more durable but I believe this thickness should also be banned. These bags are still made a LDPE (low density polyethylene), thus they are still made of plastic. Not including these in the banning of the single use plastic bag would be contradicting the statement.

New Zealand companies currently pursuing a voluntary phase out of single-use plastic shopping bags are considering middle-weight multi-use plastic bags as alternatives for customers to purchase. These are approximately between 50 to 70 microns. I saw these bags in countdown that were cheap to purchase. I was appalled to see these. Good on countdown for banning single-use plastic bags but using a thicker plastic bag so it can be used more times is not the solution. These can often be treated as single use and therefore cause more harm than the 35-micron bags. Yes, they are thicker, and they can be reused more times and thus aren't classified as a 'single use' plastic bag but they are still PLASTIC. If this is really a step to banning plastic in New Zealand we should do it right the first time and ban ALL plastic bags. The alternative bags should be environmentally friendly and long lasting. A community services card should provide a price reduction of those bags, so they are affordable for everyone.

Education and advertising will need to play a key role in promoting the care of reusable bags to insure they are re-used as many times as possible to reduce environmental impacts. If everyone treated the reusable bags like single-use bags the environment impact would be far greater.

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

- Yes
- No
- Not sure

If yes, what are they and why should they be exempt?

In this consultation document the term single-use plastic shopping bag means a new plastic bag (including one made of degradable plastic) which has handles and is below a particular level of thickness. The phase out would apply to these bags when they are sold or distributed for carrying sold goods. An important point to notice is that the bag must have handles. This means that bags that don't have handles including garbage bags and animal waste bags are not included in the proposal.

I researched other countries who have or are planning to ban plastic bags to see what their by-law exempted. Montreal, Canada banned plastic bags as of January 1, 2018. Bags not covered by their by-law include plastic bags used exclusively to transport foodstuffs to the cash counter of a retail store or to protect them, for hygiene purposes, from direct contact with other items (fruits, vegetables, nuts, bulk confectionery, prepared foods, meat, fish, bread, dairy products, etc)([http://ville.montreal.qc.ca/portal/page?\\_pageid=7418,142803238&\\_dad=portal&\\_schema=PORTAL;](http://ville.montreal.qc.ca/portal/page?_pageid=7418,142803238&_dad=portal&_schema=PORTAL;)). Victoria, Australia are to ban plastic bags by the end of 2019. Their law exempts smaller bags used for fruit, vegetables and meat. Garbage bags and animal waste bags are also exempt. The term single-use plastic bag in this consultation already exempts these listed exemptions since usually none of these bags have handles. Therefore, if you stick with the definition of a single-use plastic bag there is no need for any exemptions to the proposed regulation.

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?

- Yes
- No
- Not sure

If yes, please specify which bags and explain how a phase out would be likely to impact on you.

[Click here to enter text.](#)

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

- Yes
- No
- Not sure

Why / Why not?

The mandatory phase out of single-use plastic shopping bags should be applied to all retailers. One might say that a few plastic bags from a small takeaway shop in a rural town will not make a difference. But if you tell 100 small takeaway shops that they are exempt from this phase out, the difference will be noticeable. There is no reason to make large retailers ban plastic bags and allow small retailers to keep them. The cost of this phase out relies on the consumer not the retailer as the consumer are the ones purchasing the bags. If New Zealand wants to make a real difference and not cause controversy on who does or doesn't get exempt, then the phase out should apply to all retailers.

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?

NA

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?

- Yes
- No
- Not sure

Why / Why not?

Yes, I agree with this. Retailers already know about this mandatory phase out of plastic bags, so they can start planning now. Six months is a reasonable amount of time for companies to get rid of their existing stockpile of plastic bags. Countdown has already banned plastic bags. Pak'nSave,

New World, Four Square, and Liquorland are also banning single plastic bags by the start of 2019. <https://www.newshub.co.nz/home/new-zealand/2018/08/pak-nsave-new-world-four-square-liquorland-to-ban-plastic-bags-in-2019.html>. If these big companies can do it before the law is even enforced, then other companies can do the same with a six month phase out period. The sooner this law is enforced the sooner New Zealand becomes cleaner and greener.

If no, what do you think would be a more appropriate phase-out period?

- two months
- nine months
- one year
- other (please specify)

NA

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).

All shopping bags have potential negative environmental impacts when they are produced and disposed of. It is how we as consumers use these bags that will influence their relative environmental impacts over the whole life cycle. Therefore, switching to reusable bags and using them enough times will bring down their impact per use. Plastic bags not only have environmental impacts but have cost impacts too. As pointed out in this consultation document 95% of the material value of plastic packaging, or US\$80-120 billion a year, is lost to the global economy after its first short use. The costs amount to at least US\$40 billion a year, which is more than the plastic packaging industry's global profit pool (World Economic Forum, 2016).

People are commonly aware of the negative effects plastic bags have on the environment. Plastic bags are not biodegradable, and are found littered not only in landfills, but in rivers, ponds and oceans. As this consultation document says the estimated current consumption in New Zealand of standard supermarket single-use shopping bags are 154 bags per person, totalling 750 million bags per year. Although this is a huge number it is still only 0.01 percent by weight total waste in levied landfills. I believe the biggest benefit of banning the single-use plastic bag is that it is a starting step for New Zealand to transition from a throwaway culture of a linear economy to a regenerative culture of a circular economy. Plastic bags touch every consumer and therefore get people to start thinking about using more renewable resources. AS the article of the Tragedy of the Commons points out the world is finite (Hardin 1968). To survive this finite world many countries including New Zealand, need to transition from a linear economy to a circular economy. Single-use plastic shopping bags where they are used once and then thrown away is a linear economy approach. Substituting single-use bags from reusable bags is a circular economy approach.

In my mind there are many positives to banning the single-use plastic bag but there are also costs to this proposed regulation. There will be an inconvenience to many consumers. When shopping, people will have to remember to bring their reusable bags with them. This will take some adjustment but over time people will get use to it. Reusable plastic bags aren't cheap. People are forced to buy reusable bags. There should be measures taken for the poor to be able to afford them. Allowing a community services card to reduce the price of reusable bags will help with this problem. People need to be educated that the reusable bags need to be used enough times to become more environmentally friendly than single use plastic bags. If they are used like single use bags they will create an even worse problem. An article in Austin states that two years after the ban was put in place, people were "throwing away heavy-duty reusable plastic bags at an unprecedented rate." The article goes on to say that if it's happening in Austin, it's probably happening anywhere else there's a ban on plastic bags. There are almost as many reusable bags at Austin's recycling centres now as there were single-use bags removed from circulation. <https://www.bloomberg.com/view/articles/2015-08-18/how-a-ban-on-plastic-bags-can-go-wrong>

As seen in overseas examples there will be an increase in bin liners and large garbage bags. These bags are thicker and therefore are individually a bigger threat to the environment than thinner single-use plastic bags. However, this increase in bin liners and garbage bags is only a small negative effect and does not outweigh the positives of banning the single use plastic bag. Hygiene is an important factor. Using reusable bags is less hygienic than plastic bags. People need to be reminded that they should be washed regularly.

Weighing up these benefits and costs I believe the benefits expected from implementing a mandatory phase out of single-use plastic shopping bags exceed the costs expected from implementing the phase out. It is a step towards New Zealand becoming a more circular economy.

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

- Yes
- No
- Not sure

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

Yes, I believe that at this stage New Zealand does have practicable alternatives to single-use plastic shopping bags. However, I think we should keep researching for better options. As most things' bags can be made more environmentally friendly. New Zealand should continue to improve the reusable bag. One that has a balance of being made from renewable resources that is environmentally friendly, long-lasting and cheap to purchase. There should also be a focus on recycling areas where people can bring their reusable bags when they are no longer reusable.

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)

- voluntary incentive schemes by individual retailers
- national information campaign and mobile phone app for shoppers
- other (please specify)

I believe that both the above options will be important to encourage people to reuse multiple-use shopping bags enough times to offset the environmental impacts of producing them. It is not only the responsibility of the government to promote this use but also retailers. Posters and ads should be used with the different types of reusable bags that are offered and how many times they need to be used to offset the environmental impacts of producing them. This number should be printed onto the reusable bags to enforce this. I believe Countdowns 'Bags for Good' scheme is a great idea. This approach offers a free replacement bag to consumers when they bring in a worn-out multiple-use bag they have previously bought from the store, and the worn-out bag is put into a recycling system. I believe all large supermarket stores should provide this option.

Reusable bags could be produced with a scanner code on it. Every time a reusable bag is used in replace of a plastic bag the retailer can scan the bag. Once a bag gets to the certain number where it offsets the environmental impacts of producing them the consumer could be rewarded. Whether this reward is as simple is an environmentally friendly produced sticker that says that this bag has now offset its environmental impacts of producing them or they are given a free environmentally friendly drink bottle or something of the sorts.

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

The biggest help to adjusting to life without single-use plastic shopping bags would be to keep the price down for reusable shopping bags. I believe that a reduction in reusable bag prices by use of a community services card would be very helpful. Information about keeping reusable bags hygienic would also be helpful, including information on how often these bags should be washed, and with what and how. Having recycling stations for bags where you can exchange your worn-out bag (used enough times to replaces its environmental impacts of being produced) for a new bag would be a great incentive and not only help with the recycling off these bags but also keep the price down of affording a new reusable bag.

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

I believe that the governments planned approach to design and build an open-sourced national litter database and train and support citizen scientists to gather beach litter data nationwide, as well as design and build litter education curriculum and train and support educators to deliver it is the best approach to monitoring the reductions of single-use plastics. In this open sourced national litter database, it should be mandatory that all retailers send a monthly report of their use of single-use plastics to the government. This will allow figures to compare with the amount of single-use plastics that are being sold, with how much are going into the waste dumps, recycling and the left-over amount that are being dispersed into our land and seas. Monitoring the reduction of single-use plastics will be vital to see how much of an effect banning the single-use plastic shopping bag has on New Zealand's environment.

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

[Click here to enter text.](#)

## Releasing submissions

Your submission may be released under the Official Information Act 1982 and may be published on the Ministry's website. Unless you clearly specify otherwise in your submission, we will consider that you have consented to website posting of both your submission and your name.

**Please check this box** if you would like your name, address, and any personal details withheld.

Note that the name, email, and submitter type fields are mandatory for you to make your submission.

## When your submission is complete

If you are emailing your submission, send it to [plasticshoppingbags.submissions@mfe.govt.nz](mailto:plasticshoppingbags.submissions@mfe.govt.nz) as a:

- PDF
- Microsoft Word document.

If you are posting your submission, send it to Proposed Mandatory Phase Out of Single-use Plastic Shopping Bags, Ministry for the Environment, PO Box 10362, Wellington 6143.

**Submissions close at 5.00 pm on Friday 14 September 2018.**