

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

Aotearoa Plastic Pollution Alliance

Reference no: 6221

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 (APPA) support the primary objective and the precautionary approach being taken by the Aotearoa New Zealand Government to address the issue of plastic pollution. (For more information on APPA, see the answer to Question 13.) We fully support the mandatory phase-out of SUPBs including those described as 'degradable', with no exemptions. Plastic pollution chokes our waterways, harms communities that depend on fishing and tourism, adversely affects more than 800 species of wildlife (Provencher et al. 2017); including seabirds, turtles, fish, whales and dolphins, and threatens ecosystems globally (Kuhn et al. 2015). It is increasingly finding its way into the food chain on which we rely. A plastic bag ban does not address all of the sources of plastic pollution in our environment, but it is an important first step towards achieving plastic free seas, while simultaneously garnering public support and awareness about the issue. Once in the environment, plastics break up gradually into micro- and nano plastics via abrasion, UV radiation, and biotically via cellular enzymes (Gewert et al. 2015). While the rate of degradation depends on the polymer type, smaller fragments of plastic degrade more rapidly than meso- or macro plastics fragments because of the surface area, and chemical and enzymatic attacks (Gewert et al. 2015). The high surface area to volume ratio that promotes degradation processes also renders smaller fragments of plastic to be more prone to sorb waterborne hydrophobic contaminants. Thus, plastic debris, particularly micro- and nano plastics present potential chemical hazards when ingested by animals due to the release of chemical contaminants from the plastic surface, the release of contaminants from the degradation of the plastic itself, and chemical additives such as flame retardants, from the plastic leaching out (Gewert et al 2015, Rochman 2015).

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

We supported the phase-out and ban of ALL plastic carry bags, regardless of the thickness. While an individual consumer might benefit from access to plastic bags, whether lightweight or heavyweight; the collective cost of any single-use plastic is borne by the community as a whole. This is because of the externalities of plastic bags. These include; carbon emissions, water pollution, waste management, litter collection costs, all of which can be estimated within the current financial framework. Importantly, the true cost of plastic waste on the environment is lacking the inclusion of one fundamental externality: the impact on wildlife. This externality is often the drive behind many public plastic bag bans worldwide. How much is an endangered turtle worth? Heavier carry bags (>35 microns) require more energy and raw plastic (from fossil fuel sources) to manufacture, thereby have a larger carbon footprint. An argument against plastic bag bans often states that the production of paper or biodegradable bags uses the same amount of energy as the current plastic bag industry and that a shift is therefore not environmentally desirable. While paper bags are not unproblematic, this idea completely ignores alternative fabric-based reusable bags. More importantly, it neglects the long-term impact the different materials have on the environment. A plastic bag is on average used for 20 minutes, but it can take up to 400 years to fragment into nature. Paper bags decompose in about two months, depending on the circumstances. If Aotearoa has a genuine commitment to climate change action, then plastic waste management legislation must consider the carbon footprint of heavier weight plastic bags. In South Australia, after the introduction of a ban in 2009 for bags under 35 microns, there was a 45 per cent reduction (by count). However, thicker bags were more common in litter stream than in other states without bans (From the MFE consultation document page 17).

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

No, we support the ban off all SUPBs, see the answers to Questions 1 & 2.

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

No, we support the position that all retailers are covered in the ban regardless of size because all SUPBs can cause environmental harm. See the answers to Questions 1 & 2.

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

Yes

Notes

Yes, six months is a reasonable amount of time for the phase-out. We are concerned that an option whereby the phase-out period is six months or less may disproportionately impact on lower socio-economic groups. We encourage government support to address this potential inequity through such discount options, as per suggested in the consultation document (page 24). If the transition period was to be longer than six months, we recommend the immediate implementation of a levy/tax to be placed on SUPBs. This would be desirable because it would generate funds to assist in the transition to plastic bag free, and for providing alternatives to lower socio-economic groups that may struggle to afford replacements over a short 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

Mā wai rā a Papatūānuku e tiaki, mei kore māku, mei kore māu? Who else will care for Mother Earth, if it isn't me, and it isn't you? Yes, we emphatically believe that the ecological and societal benefits of a plastic bag ban outweigh the costs. Every week, another grotesque story illustrates the impact of plastic in the environment. A whale was recently found with 80 plastic bags in its stomach - it died, of course. One-third of marine turtles have been killed or become ill due to plastic ingestion in Aotearoa. A 2015 study suggested that 99% of seabirds would be ingesting plastic by 2050. The authors also predicted that seabirds in Te Tai o Rēhua (Tasman sea) would be the hardest hit, because of the high densities of seabirds foraging in the region. This not that surprising, given that the earliest observations of Aotearoa's seabirds ingesting plastic go back to 1958. NZ already has more threatened seabird species than anywhere else in the world. Given that they are particularly vulnerable to plastics this results in a massive responsibility to protect our waters. Plastic pollution has not only been demonstrated to pose a significant threat to marine life through ingestion and entanglement (Kühn et al. 2015), but there is increasing evidence of toxicological implications for those species that ingest (micro) plastics. Microplastics come from direct sources, such as from virgin production pellets and in personal care products like shampoos (banned in July 2018), but they also come from the breakdown of macroplastic items, such as plastic bags. This action may not be palatable to some members of our society, but it is our obligation as kaitiaki to take evidence-based steps to achieve a common goal to protect and conserve our home. A plastic bag ban takes us closer to reducing the impacts on our marine ecosystems from plastic pollution, systems that are already under pressure from climate change, fisheries exploitation, and other forms of contamination. We support the government's proposal and believe the mandatory phase-out will be successfully adopted by the population, as we can see from the majority of well implemented 140 international regulations put in place (UNEP Single Use Plastics, Road Map for Sustainability, 2018). The long-term benefits to the environment are priceless, and we commend you for initiating the process.

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

Yes, many consumers in Aotearoa already use reusable bags. Initiatives such as Boomerang Bags or those available at the supermarket are well documented in the MFE consultation document. However, when considering alternatives, we must keep in mind the nation's goals of "redesigning waste out of the system" and so ensure that we are looking at the end of life of products just as much as their production and use. Consider what our current recycling facilities accept and can actually process, as well as weighing up their lifespan and break up or down in the natural environment if lost. High micron and mixed material bags are not a step in the right direction.

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

Other (please specify)

Notes

Engagement and education programmes such as Para Kore ki Tamaki, Para Kore and Pacific Vision Aotearoa offer the most effective alternative to single-use plastics through their empowerment of consumer choices to refuse and reuse. Recognition of community, faith and culture based incentivised empowerment programmes instil social behaviour change and the obligation of protection of the environment.

Clause

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

Notes

APPA is an organisation, and as such, this question is not applicable. However, it is probably safe to say that all APPA members have embraced living without single-use plastic (shopping bags or otherwise).

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 need accurate and detailed data from the industry on the volume/numbers of plastic bags that are distributed before the ban, as well as environmental baselines before the implementation to measure the impact of a ban on reducing pollution. Since all bags are imported (according to the discussion document), a simple reporting requirement upon customs could be introduced. However, eventually, bags should be illegal to be imported (like in for example Kenya). Monitoring should be performed through an independent entity. A long-term monitoring programme should be facilitated that encompasses a nationwide scope with protocol aligned to international sampling, reporting and analysis standards. It is imperative to understand the quantities of use and loss at all levels (inform future assessment), as represented in a life cycle assessment. This would include manufacturers, traders and retailers to record their handling as well waste management on the other end to know what is coming into the landfill and recycling schemes.

Clause

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

Notes

The Aotearoa Plastic Pollution Alliance (APPA) is a central hub for all stakeholders, including communities, hapu, iwi, industry, researchers, academics, individuals, youth, NGOs, businesses and government, to connect, learn, and facilitate. This passionate platform enables insights and effective collaboration through combining specialities, experience, work, knowledge, and connections, to more efficiently provide Aotearoa with the tools and information to best address the issue of plastic pollution. APPA fully supports the mandatory phase-out of SUPBs including those described as 'degradable', with no exemptions. Plastic pollution chokes our waterways, harms communities that depend on fishing and tourism, adversely affects more than 800 species of wildlife (Provencher et al. 2017); including seabirds, turtles, fish, whales and dolphins, and threatens ecosystems globally (Kuhn et al. 2015). It is increasingly finding its way into the food chain on which we rely. A plastic bag ban does not address all of the sources of plastic pollution in our environment, but it is an important first step towards achieving plastic free seas, while simultaneously garnering public support and awareness about the issue. APPA supports the development of an overall National Waste Prevention Strategy that encompasses all aspects of pollution, including all types of single-use plastics.

Supporting documents from your Submission

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The Aotearoa Plastic Pollution Alliance is a collective of NGOs, activists, scientists, scholars and Tangata Whenua working collectively to support a healthier environment in and around Aotearoa through reducing plastic pollution.

We wish to express our extreme concern at the continued use of plastic bags by Countdown after promoting their voluntary phase-out of plastic bags.

In promoting their plastic bag phase-out, Countdown rightfully acknowledged “our environment and marine life suffering because of plastic pollution, and the impact on our ecosystems is unacceptable. The debate is over on why we are doing this and now it's time to get moving.”

While we applaud Countdown’s stated awareness to the impact of plastic bag waste upon the environment, it’s nonetheless very disappointing to see that they have replaced this with a thicker (55micron) plastic bag which will simply take longer to break down, causing greater impacts upon the environment.

Countdown has been challenged by a confused and disappointed public on their move towards thicker plastic bags, and have responded saying that:

“Our first preference is that our customers bring their own bags, but as Kiwis adjust to the change, we know that some customers are going to find it hard to remember their reusable bags every time. If you get caught out we felt it was important to have an affordable and reusable solution so that we’re not putting additional pressure on people’s budgets. The 15c bag is 55-micron plastic and is tested to be used up to 20 times. These bags can be recycled through the Soft Plastics Recycling Scheme, and from August will be made from up to 80% recycled plastic. Any profits from these are donated to charity. Over the next year, we’ll review this 15c emergency bag to assess whether it’s needed as an option at check-out.”

To these points, we respond that:

- It is possible, and vastly more preferable that Countdown invests in sustainable alternative options other than plastic as an emergency option. This could include paper options (with 40% recycled product and sustainably sourced as is the case in San Francisco), or other sustainable material options. In particular we wish to support and highlight the wonderful community solutions of "borrow and return" bag bins, and note that other suppliers also repurpose their produce boxes for customers to use.
- The soft plastic recycling scheme has not been deemed successful in diverting soft plastic waste from entering the waste stream. After one year in effect, 17,000 tonnes of soft plastics were still making their way to landfill in Auckland alone, while only 360 tonnes of soft plastics was collected across the entire country. The scheme is not easily accessible to all of Aotearoa, and remains under threat because we are not re-importing the recycled plastics at a high enough rate.
- While thicker plastic bags can technically be used more often, this does not guarantee that they will be used more often, and in fact, as Countdown acknowledges, the NZ public requires support and education towards responsible waste behaviours. Relying upon consumer responsibility negates the principle of corporate responsibility. In the absence of sound mandatory product stewardship including the provision of sustainable plastic bag alternatives,

there is a high likelihood that the thicker plastic bags will still make their way to landfill, or ecosystems, and create problems. Furthermore, even if a consumer achieves 20 uses, these bags will still persist in the environment, bulking landfills, and disrupting ecosystems and endocrine systems.

- While bags that are made up of 80% recycled content are an improvement on 100% plastic, this can impact even further on their suitability for soft plastics recycling, and the fact that they are up to twice as thick as single-use bags means that there will still be relatively significant levels of virgin plastic being extracted for their production.
- Having plastic still on display and for sale creates consumer confusion, and undermines the overarching message that plastic bags are harmful.

In short, 55micron plastic bags are not a viable solution or acceptable transitional measure away from single-use plastic bags. They can often remain single use, simply persist even longer in the environment, and in the time it takes to review this measure, an unacceptable number of thick plastic material will have been produced, distributed, and entered our environment with devastating consequences.

Our suggestion to Countdown is that they remove the 55micron plastic bag immediately, and stock sustainable options as emergency measures while shoppers acclimatise to NO plastic bags.



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