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Ministry for the Environment

PO Box 10362

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Waste Free Future Consultation

Introduction

1. Our Seas Our Future Charitable Trust ("OSOF") is a not-for-profit organisation that aims to protect New Zealand's coastal and marine ecosystems through advocacy, education, and environmental stewardship, ensuring that they are managed sustainably and protected for future generations.

2. OSOF has been campaigning on the phase-out of single-use plastics in New Zealand under our "**Plastic Free New Zealand**" brand for a number of years, and this work is ongoing. Our work in this overarching brand includes nationwide coastal clean-up events, outreach and community education in schools and community groups, encouraging behaviour change through social media and content creation, including a 2014 petition (Petition 2014/0022) to phase-out single-use plastic bags that was presented to the Local Government and Environment Select Committee. The Ministry for the Environment advised that a ban or blanket charge on single-use plastic bags would be impractical in New Zealand, and disagreed with the petition. It is encouraging to see that this view has since changed.
3. OSOF welcomes the opportunity to comment on the Ministry for the Environment's **Waste Free Future Consultation** on the mandatory phase out of single-use plastic shopping bags in New Zealand.

Our Submission

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 (eg, oxodegradable, biodegradable and compostable) plastic?

4. **YES** - OSOF believes that it is important to phase out the sale and distribution of petrochemical bags, and in addition include in the ban, degradable plastic bags that are unable to be appropriately recycled or managed by facilities in New Zealand. The mandatory phase-out should also include rubbish bags used by city councils.

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?

5. **B) - Under 70 microns in thickness** - Due to the hazardous nature (**Steensgaard et al., 2016**), any bags which are 70 microns in thickness or less should be considered in the ban, furthermore, as larger micron thickness bags also have a significant environmental impact at the end of their life-cycle, OSOF acknowledge that plastic bags of all thicknesses should be considered for phase-out.

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

6. **No** - There are no alternatives or types of single-use plastic bags we would consider for exemption in this proposed ban.

Question 4 - Do you currently manufacture, sell, provide or import for sale or personal use these types of single-use plastic shopping bags:

7. **No** - OSOF has no relationship with the manufacture, sale or use of single-use plastic shopping bags.

Question 7 - Should smaller retailers be exempted from a mandatory phase out of single-use plastic shopping bags?

8. **No** - Although it is acknowledged there may be socio-economic constraints for such businesses in the phase-out of plastic bags; the cost-benefit of continued phase-out over all retailers is greater than if smaller retailers are to be exempt. There are non-plastic alternative available that can replace single-use plastic shopping bags, and as demand for this alternatives grow, more cost-effective alternatives will continue to become available.

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?

9. OSOF recommends that believe no retailers should be exempt from the plastic bag phase-out. Alternatives already exist for all retailers to adapt within a six month phase out time-frame.

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?

10. **No** - Due to the large public awareness and continued nation-wide behavioural campaigns such as "Plastic Free New Zealand" and "Bags Not", including initiatives for alternatives, six months should be a maximum time-frame from when regulations are Gazetted, subject to consultation. OSOF recommends that the phase-out period of at least a six month 'open' time-frame should be capped to a maximum of six months for a phase-out.

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?

11. **Yes** - It has already been well established that marine species and marine ecosystems are already affected by plastic waste, including species of higher trophic levels (**Wright et al., 2013; Merick, 2018 (thesis)**) and lower, crucial trophic species (**Reisser et al., 2014**). This also includes evidence of trophic transfer across food-webs, potentially to highest trophic species, such as humans (**Farrell and Nelson, 2013**). It has additionally been recommended that plastics should be subject to higher levels of monitoring and reporting which other hazardous waste materials are subject to, due to their deleterious nature (**Steensgaard et al., 2016**). Due to the high potential to negatively impact New Zealand ecosystems and ecosystem services, which also has significant economical impacts, OSOF fully endorse a phase-out of single-use plastic bags.

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

12. **Yes** - OSOF recognises that there are practical alternatives to single-use plastic shopping bags. However to make these more attractive to consumers there needs to be larger initiatives, larger alternative roll-out, incentives for businesses to transition to adopting alternative options such as cloth, paper and other natural fibre bags and more readily available reusable/recycled alternatives. In addition, OSOF recommend that those who sell or produce single-use plastic bags should be accountable and responsible for tracking and managing such bags throughout their life-cycle, including their re-purpose or disposal.

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)

13.OSOF endorses:

14.**A.** Voluntary incentive schemes by individual retailers

15.**B.** National information campaign and mobile phone app for shoppers

16.**C.** Rewards systems, penalties on the bags exempt from the ban which are made from plastic .

17.**D.** Taking away the single use option

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

18.OSOF acknowledges the role of increased accessibility of alternatives, such as cloth, paper and other natural fibre bags; the advent and role out of nation-wide education program starting from schools; and new technology to make it more convenient.

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?

19.Tracking and accountability of retailers selling and those producing to be responsible to the end of the life of the bags/plastic. As recommended by **Steensgaard et al., 2016**, plastics should be considered and tracked as Hazardous waste material. Greater attention also needs to be paid of the data for the development, initiative, legislation, education of policy towards other plastic items.

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

20. OSOF fully endorses the Ministry's action through this consultation on the single-use plastic shopping bag ban. However, more needs to be done than just legislation towards the ban of one type of disposable plastic. More focus and larger incentives/budget needs to be directed towards waste minimisation, reduction of other single-use plastics such as rubbish bags, fast food packaging and single-use cutlery. The Ministry should consider initiatives implemented by EU countries that have already passed legislation on these other items. This includes the recommended tracking and including disposable plastic in hazardous waste legislation.
21. OSOF believes that this opportunity to phase-out single use plastic bags can be extended to include a wider range of single-use plastic products used by the hospitality and retail industry, such as plastic straws, plastic cutlery, and plastic takeaway containers, including rubbish bags.
22. Based on the Ministry's advice on our 2014 petition that 'they [plastic bags] represent only 0.2 of landfill waste', **OSOF strongly advises that this opportunity to tackle the environmental problems associated with single-use plastics should be used to create a more robust phase-out that includes a wider range of single-use plastic products.**
23. A future where not only reusable but actually reused bags are part of New Zealand's cultural norm is the desired outcome. To get there the use of all plastic shopping bags should be banned, not just single use plastic bags. Provided the more convenient alternative is available, the desired outcome will always be undermined. A bold decision that encourages our people to be innovative and find solutions will go a long way to fulfilling our national reputation as world leaders in environmental causes.

References

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30. Plastic Free New Zealand - <https://www.facebook.com/PlasticFreeNewZealand/>
31. We thank you again for this opportunity to comment. Yours sincerely,