



MAD BUTCHER

NEW ZEALAND'S BUTCHER Since 1971

Mad Butcher Holdings Limited

Ground Floor, Building B, Ascot Business Park, 95 Ascot Avenue, Greenlane, Auckland 1051

PO Box 17474, Greenlane, Auckland 1546

Ph: 09 531 5911 • Fax: 09 529 7972 • www.madbutcher.kiwi

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By email: plasticshoppingbags.submissions@mfe.govt.nz

Proposed Mandatory Phase Out of Single-use Plastic Shopping Bags
Ministry for the Environment
WELLINGTON 6143

SUBMISSIONS ON PROPOSED MANDATORY PHASE OUT OF SINGLE-USE PLASTIC SHOPPING BAGS

Submitter details

Company name: Mad Butcher Holdings Limited

Contact person: Michael Morton, CEO.

Address: Ground Floor, Building B, Ascot Business Park, 95 Ascot Avenue, Greenlane, Auckland 1051

Email: mmorton@madbutcher.co.nz

Region: National

Phone: 09 531 5911

Submitter type: Business

About us

These submissions are made by Mad Butcher Holdings Limited (**Mad Butcher**). Mad Butcher is the family-owned franchisor of the Mad Butcher chain of 28 independent family-owned butcher stores. We also have 5 Mad Butcher stores owned by the owner of the Mad Butcher.

Mad Butcher is the largest independent meat retailer in New Zealand. Meat is delivered into store fresh each day, and cut and packed on site by skilled staff.

Please see madbutcher.kiwi for further information.

Submissions

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?

Yes / No / Not sure Why / Why not?

Yes, but with the important exception for food hygiene reasons set out below for the sale of uncooked meat and chicken products.

Mad Butcher supports good environmental outcomes. Mad Butcher and its franchisees have been progressing a number of initiatives to reduce their environmental impact, including installing LED lights, replacing refrigeration with greener refrigerants, and introduction of self-absorbent meat trays. We have also introduced reusable shopping bags and we are increasing the range of reusable bags we offer to our customers.

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?

- a. less than 50 microns in thickness**
- b. less than 70 microns in thickness**
- c. other (please specify)**

We prefer option b. We think this is necessary to reduce the sale of so-called reusable bags, many of which will only be used once. We think this is a significant potential issue for the environment.

Question 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

Yes.

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

Plastic "barrier" bags for the supply of cooked and uncooked meat and chicken. Set out in the following paragraphs are the reasons why we submit they should be exempt.

Unacceptable contamination risks from use of reusable bags for uncooked meat and chicken

The use of reusable bags (of any type) for uncooked chicken and meat products involves significant contamination and health risks. We are very concerned about the risk of food poisoning – and the potential death – that could arise from the use of reusable bags. There is a real risk to the elderly, the infirm and pregnant women in using reusable bags for uncooked meat and chicken products. In our view as a responsible butcher there are unacceptable health risks from using reusable bags unless there is an ability to supply customers with a barrier bag into which meat and chicken products can be inserted.

For food safety reasons raw meat needs to be separated from other food products. Salmonella is naturally occurring in chicken, and raw meat also needs to be treated with care. We provide 16 micron plastic bags to be used as a barrier to protect our customers. Our food safety programme includes the requirement to put uncooked chicken products in a separate bag (even though they are, of course, wrapped separately).

Special reusable bags for uncooked meat and chicken not feasible

We have considered whether it might be possible to offer for sale lined and washable reusable bags to be used for uncooked chicken and meat products (in addition to the other reusable bags we sell). We have discounted this for food safety reasons as it would be very difficult for customers to clean chicken or meat juices that may leak into the bag - and we think it highly unlikely that the average consumer would clean their bags either when required or correctly.

You will also appreciate that some consumers would - notwithstanding warnings to the contrary - use reusable raw meat and chicken bags for carrying other items. Accordingly,

from a food safety standpoint there is an unacceptable risk of contamination from special purpose uncooked meat and chicken bags.

Paper wrap and paper bags not feasible

Customers would not be able to carry an average meat shop if it was wrapped in paper. If we were to use biodegradable paper bags they would not be strong enough. And a paper bag would break if there was a leak. Accordingly paper is not a feasible option.

Conclusion – a barrier bag is necessary for safe supply of meat and chicken

As a responsible business we cannot support the use of reusable bags for uncooked meat and chicken. It is important that a barrier bag is able to be supplied to customers. The barrier bag can, of course, be used with a reusable bag.

What is a barrier bag?

A barrier bag is a bag that can be used to protect unwrapped products and to prevent leaks of meat and chicken juices from wrapped products.

It is important to note that barrier bags need to be different sizes for different uses. For example, the types of products we supply we need to provide the option of a barrier bag that is much larger than would be appropriate for a few pieces of fruit or vegetables. Our largest meat tray size is a FST1411, which has the dimensions of 350 X 280 X 25mm (deep). Many of our customers buy a week or more of meat in one shop – or more during bbq season – and meat trays must be kept flat to minimise the risk of juice leakage. Customers typically purchase 6-8 items in each shop.

For safety reasons and for the convenience of our customers we would like to be able to provide barrier bags with handles. We would like to offer our expertise to the Ministry if we can be of assistance to comment on the regulations around permitted barrier bags.

Isn't it possible to prevent leaks?

The natural state of meat and chicken products are that they have a high moisture content that we cannot overcome. While the risk of leakage from wrapped meat and chicken products is low, it is not possible to guarantee that there is *zero* contamination risk from wrapped meat products – regardless of the method of containment. There is always a risk of plastic being penetrated or seals failing.

We sell meat primarily in meat trays of different sizes, including bulk sizes, wrapped with plastic, and we also sell meat cut to order. Traditional butchers such as Mad Butcher have trained butchers that cut meat in-store. When meat trays are stacked or roughly treated by customers there is a risk of the wrap being broken or the wrap otherwise leaking.

If we were to increase the plastic film wrapping for every meat packet to help reduce the risk of leakage it would not reduce to zero the risks of leakage. It would also result in a substantial *increase* in plastic that would be greater than that in plastic bags. This would not be a good environmental or cost outcome, and it would not achieve the Government's or our environmental objectives.

As we pack fresh in store we do not operate a central factory and we cannot fully seal meat packs. The local owners of our franchised stores do not have the resources to buy the large and expensive machines necessary to vacuum seal meat – and we could not fit the machines in our stores. Vacuum packing also uses thicker micron bags – which increases waste. Vacuum packing would add significant cost that we estimate at additional 10% - which is not something that consumers would wish to see passed on to them. Vacuum packing is primarily used to extend the life of meat so that it can be shipped from a factory into multiple stores over different locations.

Further information

As these food safety issues are understood by New Zealand Food Safety and other government bodies and regulated by the Food Safety Regulations etc., we did not consider

it necessary to include detailed information. However, if you require further information, please let us know.

Question 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

Yes we provide plastic shopping bags of 16 microns.

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

The main – and significantly adverse - impact on us is the food safety issue we refer to above in relation to the unsafe use of reusable bags for meat and chicken products. Other than this we already offer for sale reusable chiller bags, and we are also sourcing new reusable bags designed to take meat trays lying down and reusable hessian bags. We brand our bags so they can be clearly identified by our customers as being used for meat products. As we will offer these alternatives we will be prepared for the ban as best as we can be prepared.

Liability for us and our directors

Our primary concern about the food safety issue is the safety of our customers. However, we are also concerned about personal liability that may arise for us, our franchisees, and the directors of each business if we knowingly allow unsafe use of reusable bags and a customer falls sick or dies. While we think this risk is low, the potential outcome – serious illness or death – means this is a real food safety issue for providers of raw chicken and meat products that cannot be ignored by either us or the Ministry for the Environment. Accordingly we strongly submit that the Ministry needs to address this food safety issue.

Question 5

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

Yes / No / Not sure Why / Why not?

No. While all our franchisees are small retailers we think it is important that all retailers address this issue as it is not an environmental issue that is relevant only to large retailers.

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?

For the reasons set out above, we do not think small retailers should be exempted.

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?

Yes / No / Not sure

Yes.

Why / Why not?

Like many businesses we are already getting prepared for the ban and are giving consumers choices. It is also an important issue that should not be delayed.

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

- a. two months
- b. nine months
- c. one year
- d. other (please specify)

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?

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).

No. We do not believe they are single use – a good proportion are used again in the home. Bin liners that will replace them will be of much higher micron and environmental impact. We think it is unrealistic to expect the reusable bag options to be used enough times to negate their additional environmental impact (as outlined in the consultation document).

Question 9

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

Yes / No / Not sure

No, not for meat and chicken products but Yes for other products.

Why / Why not?

As above

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

An option for "barrier bags" where food safety requires the use of a plastic barrier bag. Categories could include loose fruit and vegetables, and meat and chicken products.

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)

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

Realistically we are not sure that there is any option that will ensure this happens. We would like to see the government educate the public in this area as it is unrealistic to expect retailers to do this.

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

Not applicable as MB is a business

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?

This is outside of our area of expertise as butchers.

Question 13

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

None

General

Thank you for the opportunity to provide submissions in this area. We would be pleased to provide further information or to assist with information to allow the preparation of regulations. We assist the Ministry with the regulations in relation to permitted barrier bags – if this was something the Ministry wished to explore.

Yours faithfully
Mad Butcher Holdings Limited