



# 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*	
Organisation (if applicable)	Z Energy
Address	3 Queens Wharf
Phone	
Email*	

Submitter type*	Individual	<input type="checkbox"/>
	NGO	<input type="checkbox"/>
	Business / Industry	<input checked="" 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?

We have taken major steps across our retail network to remove single use plastic bags for customers. The phase out of convenience plastic bags for carrying groceries was announced by Z in November 2017 was completed across our 204 sites on June 1st 2018. Our experience is most customers have adjusted well to bringing their own reusable bags, using boxes provided or simply carrying items in

their hands. Many customers are supportive of the phase out and happy with the reasons for the removal of bags after a positive explanation is offered.

Phase out of single-use bags for shopping will need to be accompanied by guidance for appropriate alternatives and measures to incentivise the use of reusable bags as many times as possible to prevent unnecessary environmental impacts from the production and disposal of alternatives offered. Advice to end-users must be simple, clear and not confuse people about the alternative options and how they should be used.

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)

[Click here to enter text.](#)

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?

The removal of single-use bags labelled degradable will remove a major area of confusion for business and consumers. It is unlikely the circumstances needed for degradable bags to work well will be regularly achieved without an extensive network of commercial composters and a comprehensive collection system for these materials. While we agree with phasing single-use bags that are labelled degradable or similar for the time being there should be space for innovation area and as scientific knowledge improves this decision could be reviewed.

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 ban on single-use plastic bags is about behaviour change and shifting customers to a new model of bringing reusable bags. Allowing smaller retailers to continue to provide bags undermines the core aim of behaviour change targeted by the proposed legislation. End users of bags are unlikely to have a clear understanding of the aims of the legislation if smaller retailers are exempted.

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?

N/A

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?

We agree with the phase-out period if there is strong confidence reasonable environmentally and ethically sourced alternatives can be purchased and supplied at reasonable cost to customers. The government has already sent strong signals the phase-out of bags will occur, and this means forward thinking businesses will have started to prepare for removal of bags on a large scale.

The time provided for phase out of the bags is reasonably long but from our experience it would be wise of the government to work with partners, retailers and NGOs to provide clear communication of the changes and over what timescale. Even with strong understanding of the reasons for change there can be a nervousness about the consequences of not offering bags to customers as this has been part of the typical customer service culture for many decades. Organisations will need some level of support in helping their staff to understand the key messages to explain the change. A small number of staff were verbally abused for not providing bags and this should be avoided.

If the phase out doesn't take longer than expected this should not be used as an excuse not to achieve the behaviour change needed. Overall, we are confident any hurdles can be overcome in the time outlined.

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

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

N/A

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).

The aim of the proposal should be about changing behaviour and moving towards a more circular economy model. This benefit outweighs the financial costs to business as in the longer term this change will encourage better options for recycling and reuse of plastic materials.

The proposal phases out should be done in a way that attempts to address and mitigate potential social issues that may be caused by removing free single-use bags from circulation. For example, during the phase out of single-use bags at Z some less affluent customers told us they use single-use bags to carry school books, and many householders use plastic bags as bin liners. While these customers understood the environmental impact of the bags use they were worried about the monetary impact of the phase out of bags. The introduction of lower cost (environmentally minimal impact and ethically sourced) reusable alternatives should be encouraged to replace these uses of single-use bags.

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?

The government needs to ensure there is reasonable guidance available to companies and end users purchasing alternative bags so inferior quality or cheap reusable bags do not cause unwanted

environmental damage in production in developing countries or within NZ. Companies should also be provided with guidance on how to source alternative options in an ethical manner to ensure the desired behaviour change is delivered in a credible manner.

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)

[Click here to enter text.](#)

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

A good set of alternative bags that we can have confidence in and be sure they have been produced in an ethical manner, provided either free or at relatively low cost.

Consistent messaging by government and retailers needs to be developed for encouraging people to reuse bags as much as possible. The reuse of the bags as often as possible will help offset the environmental impact of production and disposal of reusable bag. Offers of free replacements on return of a single-use bag etc. for single-use bags by major retailers or other similar schemes may be one way to easily achieve this aim.

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

Retailers and packaging producers must be encouraged to voluntarily measure and report their production and use of plastics. One major improvement would be for producers of plastic to provide figure of plastics produced for domestic and export markets. Now tracking the import of plastic resin to NZ is possible but the export of finished plastic products made in NZ means it is impossible to accurately work out how much single-use plastic is used in NZ each year.

Voluntary measures could include signing up to the government backed NZ Packaging Declaration that requires reporting annually on the quantity of single-use plastic bags used and action to reduce single-use plastics. A compact approach led by the government/industry/retailers/NGOs etc. that is widely publicised as the next step in tackling single-use plastic would start to encourage greater monitoring and reporting.

This or similar measures backed by appropriate industry/government communication and education programmes would raise awareness of problems both internally for Z Retail Teams and externally with the public to manage single-use plastics appropriately.

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

Z Energy is fully supportive of the aims of the proposed legislation to change public behaviour towards single-use plastic and encourage approaches that move NZ closer to a circular economy. The need to address single-use plastics should be developed with the view some plastic use is appropriate for increasing food shelf life and reducing carbon emissions e.g., in transport of products. Z Energy believes there is continuing role for suitably managed plastic in addressing

these pressing environmental issues as alternative solutions are developed. A delicate balance needs to be struck during the phase out to prevent all types of plastic even reusable materials or innovative bio-material items being demonised by the public.

The phase out of plastic bags is an excellent start to addressing the environmental impacts of single-use plastics but other measures must be put in place to address the wider issues of single use plastics and develop other approaches for a circular economy.

## 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.**