



**Submission to:**

**MfE proposed mandatory phase out of single use bags**

**Submission by:**

Jacqui Forbes - Kaihautū Matua (General Manager) for Para Kore Marae Incorporated  
YES - PARA KORE WOULD LIKE TO SPEAK TO THEIR SUBMISSION

*Riro Taonga Mai, Hoki Taonga Atu*

*We receive valuable resources from Papatūānuku, we return valuable resources to her*

Tēnei te mihi nui ki a koutou katoa, koutou ngā kaimahi te Manatū o te Taiao, ki a koe hoki, e te minita - nei rā te mihi, nei rā te tangi!

**Background**

We are making this submission on behalf of Para Kore Marae Incorporated. Para Kore is a zero waste organisation with a kaupapa based on whakapapa to Papatūānuku and expressed through an experienced and skilled team who are passionate about, and committed to, achieving a zero waste Aotearoa. In 2009, we started with a pilot project of three marae. We are now supporting over 275 marae, kura, kōhanga reo and community groups across Aotearoa to reduce waste through refuse, reduce, reuse, recycling and composting. We deliver community education to put zero waste practices in place and aim not only to reduce waste but to strengthen communities. Our mission is that by 2020 all marae and Māori organisations in New Zealand are working towards zero waste.

**Reducing plastic waste entering the marine and land based environments**

In the MfE consultation document you acknowledge the need to reduce the amount of plastic waste entering the environment, and especially the marine environment. We support this initiative and congratulate you on this endeavour. Although we would have liked to see a bag levy put in place to provide funding for waste minimisation, we see the benefit of putting a mandatory ban in place.

Para Kore promotes circular economy principles, where design eliminates the creation of waste in the first place. This is why we encourage MfE to consider providing support to families, community, businesses and individuals to adopt behaviour that supports a circular economy. With a plastic bag ban in place we need to ensure that high quality alternatives are made available. This means that should bags under 70 microns be banned, reusable bag alternatives are durable enough to be used enough times to provide an environmental benefit. We also encourage MfE to continue to use the Waste Minimisation Act for waste minimisation of other products such as tyres, hazardous waste, e-waste and single use containers. A container deposit systems, as suggested by the Kiwi Bottle Drive, is good for the environment, the economy and the community and moves us towards closed loops and circular economies.

We appreciate the opportunity to be a part of putting a plastic bag ban in place. We strongly encourage MfE to continue to work on waste minimisation policy and take steps that could allow life to flourish in Aotearoa/New Zealand. We look forward to being a part of further measures toward adopting a circular economy approach and eliminating single-use mindset that is not reflective of a value for the environment.

**Recommendations:**

*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?*

**Para Kore's position:** Yes. We agree with the proposed mandatory phase out of the sale and distribution of single-use shopping bags in Aotearoa. This includes those made of degradable plastic because these products are a hazard to our environment as they have the potential to introduce plastic into marine, freshwater and land based ecosystems. Plastic, whether from plastic bags or from "biodegradable" plastics could pose a risk to the entire environment, of which humans are a part. Not enough is known about the environmental impacts of "compostable" bags, which still contain a percentage of plastic and have no New Zealand composting standard to meet. Single use bags claiming "biodegradability" and "compostability" have specific end of life requirements that can be confusing to consumers, who believe they are "doing the right thing" by using them. In addition, not enough

facilities in New Zealand are prepared to process compostable shopping bags. We support the use of reusable products where ever possible to stem the flow of harmful macro and micro plastics and the toxins they carry into our earth.

A bag levy would have been preferable as this would have incentivised reuse rather than single use while accumulating a pool of money to put back in to waste minimisation.

*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?*

**Para Kore's position:** Less than 70 microns in thickness. We prefer for all single-use plastic shopping bags under 70 microns in thickness to be phased out since bags over 70 microns in thickness are designed to be used multiple times. Good quality bags over 70 microns in thickness include community sewn recycled fabric bags. Bags that are above 70 microns but are poorly made could still become rubbish if they break. This is why good quality bags should be incentivised through things like community sewing initiatives. In order to move toward a circular economy, putting a plastic bag ban in place and replacing single use items with long lasting, solutions based alternatives is necessary.

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

**Para Kore's position:** No. No single use plastic bags of any material should be exempt. In addition, the government should strongly encourage retailers to set voluntary charges for any single use bags of any material not covered by the ban. E.g. paper bags. Research has estimated that the average household uses 15 plus single use bags per week so reducing total consumption is also important.

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

**Para Kore's position:** No.

*5. Should smaller retailers be exempted from a mandatory phase out of single-use plastic shopping bags? Why / why not?*

**Para Kore's position:** No. No retailers should be exempt from the single use plastic bag ban as the alternatives are readily available and affordable for businesses of any size. Litter that comes from a large or small retailer is still litter. Customers of both small and large retailers should be encouraged to use reusable products to carry their goods in order to minimise waste.

*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?*

**Para Kore's position:** Smaller retailers should not be exempted from a mandatory phase out of single-use plastic shopping bags.

*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?*

**Para Kore's position:** We agree with six months but note the "at least" language and submits it should be "no-longer than" six months as this timeframe allows New Zealand to meet its World Trade Organisation Technical Barriers to Trade Agreement commitments. In addition, if the ban is implemented in July 2019 this will ensure the phase out comes to an end in the lead up to Christmas enabling any retailers with stockpiles still left to use them up in the pre-Christmas and Boxing Day sales.

*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).*

**Para Kore's position:** Yes. Some of the benefits of a mandatory phase out of single-use plastic include: reduction of macro and micro plastics entering the freshwater and marine

environments; minimisation of plastic waste going to landfill and the reduction of harmful effects of landfill use; reduction of plastics making their way into the food web, including into human consumption; a move toward a circular economy that better reflects the finite resources of our planet; a mandatory phase out of single use bags can help prepare for other waste minimisation steps such as a bottle deposit scheme; elimination of ratepayers bearing the cost of plastic bag clean up; the preservation of Aotearoa/New Zealand's image as a "green" country among our tourist population which is our main industry.

*9. Do you think that reasonably practicable alternatives to single-use plastic shopping bags exist in New Zealand? Why / why not?*

**Para Kore's position:** Yes. Reasonably practicable alternatives to single-use plastic shopping bags include reusable shopping bags over 70 microns in thickness. For example, we have seen many communities start bag sewing projects to provide recycled cloth shopping bags in place of plastic. Environmental and social service organisations, such as bag sewing projects and community houses, should be supported to provide free shopping bags for low income families in order to make the transition away from plastic bags practicable for all people.

*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)*

**Para Kore's position:** Other. No bags should be given out for free by retailers at the point of sale in order to encourage people to bring their bags to the check out. Signs to remind customers to bring their bags should be present at all major retailers. Organisations that promote reuse habits, such as Para Kore, should be supported to continue their work in waste minimisation and education.

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

**Para Kore's position:** Adjusting to life without single-use bags needs to be a combination of changing habits and culture around single use as well as education about circular economy type thinking. This shift in culture should begin by asking people what their current habits

are and what barriers are in place in order to determine what practical alternatives could be adopted. We urges the Ministry to use a community based social marketing approach and conduct research to identify what the barriers and benefits are for people who still use plastic bags and focus the campaign on reducing those barriers or promoting the benefits. Based on the results of this research a reasonable plan can be put in place to help change our plastic consumption.

Some additional ideas that might help change individual behaviour include:

- The value of reuse should be made a part of our culture. For example, community organisations that sew recycled fabric reusable bags should be supported. Education around the value of reuse should be made available through signage and waste minimisation programmes.
- Reusable bags should also be made available to low income families for free to ensure accessibility for all

Information for retailers on the best alternatives for single use plastic bags should be provided by the Ministry and in a timely manner. We recommend providing information to retailers at least four months before the regulations are in force as this will allow retailers 10 months to source appropriate alternatives.

In particular retailers should be provided information on:

- The most environmentally friendly alternatives to single use plastic bags using NZ based research (as in reusable bag options)
- The need to avoid bags made from compound materials e.g. jute bags lined with plastic; paper bags with rope handles as these bags cannot be recycled with disassembling
- (If compostable bags are not included in the ban) what standard reusable compostable bags need to be certified to in order to be accepted by commercial composting facilities
- The importance of providing disposal information on the bag for end of life

Retailers should be encouraged to consider providing a bag for life option as Countdown has done if appropriate for their business. Retailers should also be encouraged to charge for any bags available at cashiers registers to reduce consumer consumption. In addition, major retailers should be encouraged to have signs in front of entryways reminding people to bring their bags. MfE should also consider mandatory labelling requirements on bags which include what the bag is made from and how to dispose at end of life.

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

**Para Kore's position:** Given the current uncertainty of the total number of single use plastic bags imported into NZ (absence of unit count and weight data), any packaging material that is produced or imported into NZ (above an undetermined volume/\$ value threshold), should be quantified and reported on via weight and unit count measures as well as dollar value.

This would enable the establishment of a circular economy approach to recycling and product stewardship schemes that can then report on total material flows for each packaging type as they enter and move through the NZ economy.

This information would also enable the government to focus on successive targeted material types that have the greatest environmental harm reduction potential, working with all stakeholders in moving towards a circular economy.

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

**Para Kore's comments:** Manaaki whenua, Manaaki tangata, Haere whakamua.

Congratulations on working toward healthier land, sea and people. Please continue to use the Waste Minimisation Act for other products such as tyres, hazardous waste, e-waste and single use containers. A container deposit systems, as suggested by the [Kiwi Bottle Drive](#), is good for the environment, the economy and the community and moves us towards closed loops and circular economies. We appreciate the opportunity to be a part of putting a plastic bag ban in place. We strongly encourage MfE to continue to work on waste minimisation policy and take steps that could allow life to flourish in Aotearoa/New Zealand.

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Ka nui ngā mihi

Para Kore Marae Incorporated

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