



# 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*	Plastic Bag Free Tairawhiti
Organisation (if applicable)	Plastic Bag Free Tairawhiti
Address	Click here to enter text.
Phone	Click here to enter text.
Email*	

Submitter type*	Individual	<input type="checkbox"/>	
	NGO	<input type="checkbox"/>	
	Business / Industry	<input type="checkbox"/>	
	Local government	<input type="checkbox"/>	
	Central government	<input type="checkbox"/>	
	Iwi	<input type="checkbox"/>	
	Other (please specify)	<input checked="" type="checkbox"/>	Community Group

\* 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?

Plastic Bag Free Tairāwhiti (PBFT) has been working hard at a local community level for a number of years now to reduce the use of plastic bags in our region. We fully support leadership from central government on this issue to achieve our aim of making Tairāwhiti single-use plastic bag free!!

We acknowledge that single-use plastic bags are one of many types of plastics entering the environment and as they are an everyday item we consider them a critical first step in changing behaviour and social norms in Aotearoa New Zealand around single-use plastics.

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)

Because this option is more likely to result in reducing the production and consumption of single-use plastic bags. The thicker plastic bags require more plastic and have a greater environmental impact. Considering what we have recognised, observed, and witnessed with consumer behaviour in our region - it is unlikely that 'thicker' bags will be re-used multiple times and they risk both an increase in the amount of plastic and number of thicker bags going to landfill or polluting our environment. If the minimum micron level for an alternative plastic bag is 70 microns then retailers will be more likely to choose bags which are genuinely reusable.

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?

[Click here to enter text.](#)

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?

Because we should be striving to remove all single-use plastic bags from our waste stream. All plastic bags have an environmental impact, whether they've come from a small retailer or a large retailer. It will become problematic trying to define what constitutes small versus large retailers, and it will make enforcement challenging. Small retailers should not be exempt as they contribute significant numbers of bags to the waste stream.

It is easier to change people's behaviour to be compliant if the rules are simple and consistent.

Rules are only worthwhile if they are enforced. Allowing small retailers to continue to utilise single-use shopping bags will be challenging to enforce, create confusion for customers, and will not aid in the behaviour changes necessary for people to adopt re-usable alternatives.

Our region of Tairāwhiti (and New Zealand in general) has many beachside communities with smaller retailers. This is further reason to include all retailers in the mandatory phase out to minimise potential environmental harm, especially in the marine environment, from single-use plastic bags.

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?

[Click here to enter text.](#)

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?

The mandatory phase-out period for single-use plastic shopping bags should be as soon as feasible, allowing enough time for a public education campaign and for retailers to train their

front-line staff. The timing should be no longer than six months as we consider six months to be sufficient to prepare and adapt to the phase out.

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

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

[Click here to enter text.](#)

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).

Absolutely. If we don't act now to minimise the production, consumption and landfilling of single-use plastics, we will be leaving future generations an environmental disaster to deal with and live amongst. Doing nothing is not an option. We anticipate that there will be positive flow-on effects from the phase-out of single-use plastic bags. In our experience, once people become aware of the plastic issues, they will think beyond single-use shopping bags and move towards minimising household waste overall.

The potential costs or lack of revenue down the track to our country if we pollute our natural environment may be far more economically costly than implementing a phase-out of single-use plastic 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?

[Click here to enter text.](#)

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)

The best way to encourage re-usables is to have no single-use plastic bag option available at the checkout/ point of sale. Once a consumer has been inconvenienced by forgetting their bag, they are more likely to remember next time.

People are more likely to reuse good quality bags that they feel good about using - either because they are a cool design, personalised, comfortable, or handmade etc.

There are many alternatives to resource intensive (virgin materials) multi-use bags, including recycled fabric bags. Using recycled fabric bags is a good way to minimise the environmental impacts of making new multi-use bags and it also encourages a circular economy by minimising waste from the fashion industry/ textiles (diverting it from landfill). Other great (lower impact) alternatives include hemp and harakeke baskets (flax kete). These alternatives should be promoted as they have a far less impact than plastic-lined jute bags produced offshore.

PBFT strongly urges the Ministry to use both a national and community based marketing approach, and conduct research to identify what the barriers and benefits are for people to phase out the use of single-use bags. The education campaign should focus on reducing those barriers and promoting the benefits.

PBFT would like to highlight the importance of considering lower income consumers with the proposed mandatory phase out of single-use plastic shopping bags. PBFT is particularly grateful that the consultation document recognised the possible need for assistance for lower income consumers during the transition. We support any schemes that make it possible to remove the cost barrier for low income families to adopt new habits when transitioning to reusable shopping bags. Socio-economic challenges are particular relevant to our community in Tairāwhiti. Low income families, and individuals and communities struggling with the realities of poverty should be considered in this proposed phase out along with the necessary behaviour change campaigns that accompany a ban. Behaviour change education should be relevant to all of our population and considerate for those with financial challenges.

Leadership and assistance from the Ministry for the Environment in identifying the key issues and providing communication resources such as education materials, posters or social media content which Councils and community groups (such as ours) can use to support behaviour changes and overcome behaviour resistance would be hugely helpful and beneficial. Clear and consistent educational messaging would be a huge help for a community group such as ourselves to support and distribute within our own community.

PBFT calls for a comprehensive nationally led education campaign that can be used by consumers and businesses/retailers alike. Importantly, the campaign and communication channels could extend to how to go plastic bag free beyond just shopping bags. For example, the same communication channels could also be used to supply information on how to avoid other single-use plastics such as plastic straws, and how to avoid generating plastic pollution, through litter reduction messaging and by avoiding unrecyclable or difficult to recycle plastic products etc.

Non-woven polypropylene bags have a high environmental impact so there is an environmental risk resulting from these types of bags.

PBFT also notes that the delegated enforcement agency for this proposed legislation will need to be sufficiently resourced to effectively investigate and enforce compliance across the entire country.

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

All members of our Plastic Bag Free Tairawhiti group use reusable bags. We have been promoting reusable bags in our community via our 'Flag the Bag' campaign, whereby we offer reusable bags for sale at cost price and we also offer recycled fabric bags created community sewing bees at no cost.

We have bag bins at our local Farmer's Market and busy Four Square store to encourage people to take a reusable bag, and return it to the bin next time (similar to the Boomerang Bags concept from Australia). This removes the issue of affordability of multi-use alternatives for the community.

Our campaign has been met with a lot of enthusiasm and we have noticed a big shift in attitudes to single-use plastic bags over the past three years in our region.

It would help if supermarkets stocked reusable produce bags for purchase to encourage people to avoid the cellophane fresh produce bags. Many consumers are not yet aware of the alternatives in this area.

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

National certification standards for packaging materials.

Regular waste audits of household rubbish bags going to landfill.

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

We are pleased that the proposed mandatory phase out includes 'compostable' and 'degradable' bags. The presence of these bags in the market has created confusion for consumers and retailers, and the use of such bags amounts to the risk of 'greenwashing' (either consciously or unconsciously by a retailers).

Also worth seriously noting is that both our region and country lacks appropriate infrastructure to accept and process 'compostable' bags. Once outside of the commercial composting process, compostable bags also have the potential to be just as harmful to marine life as petroleum based plastic bags. As highlighted in the recent Parliamentary Commissioner for the Environment's report on "Biodegradable and compostable plastic in the environment (2018)" there is a high degree of uncertainty around the environmental impacts of these substitute materials have, and what is needed to safely manage them at end of life.

We also support for oxo-degradable bags of any size or weight to be phased out. This is because they cannot be recycled or composted. Oxo-degradable bags can contaminate recycling processes and are potentially worse for the environment than non-degradable plastic bags. Evidence indicates that oxo-degradable plastics do not degrade into harmless residues in the marine environment, but instead fragment into 'tiny pieces' of plastic and contribute to microplastic pollution. The significance of the marine environment to our region makes the risk of oxo-degradable bags particularly relevant.

We support the mandatory phase out as opposed to a levy (as adopted by other countries). We fully support the Government further utilising the powers of Waste Minimisation Act. We encourage the Government to consider additional phase-outs of other single-use plastic items in the near future. We urge the Government to use the powers of the Waste Minimisation Act to introduce mandatory product stewardship schemes. This is particularly important to bring industry in line with sustainable business practices and will have the biggest impact on minimising plastic waste in our waste streams. This is considered urgent in light of the stockpiling of recyclable waste products that can no longer be sent to China for processing.

Ministry for the Environment should consider labelling requirements which include how to dispose of allowable bags at end of life.

## 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.**