



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. 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. 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*	Dominic Scahill
Organisation (if applicable)	
Address	
Phone	Click here to enter text.
Email*	

Submitter type*	Individual	<input checked="" 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 type="checkbox"/>	Click here to enter text.

* 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?

I 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 plastic.

It is a simple process to look at the facts regarding the amount of waste humans produce. More

specifically the amount of plastic waste we produce. Currently, in a general sense, the world is operating on a 'linear' economy of take-make-dispose. When thinking about this approach it is hard to have an environment that will be respected and used in a sustainable sense because people are inclined to dispose of products, packaging, and more, so easily without thinking of the repercussions. Human population, and aspirations for consumption keep growing. As a result, as mentioned in Ministry for the Environment 2018, global consumption of raw materials and natural ecosystem services is increasing rapidly in a degrading environment. There is already evidence that indicate we have already stepped over a number of safe planetary boundaries (Steffen et al, 2015).

An important factor influencing my agreement to this phase-out is the large percentage of plastic that makes up the marine litter. It is estimated that 80-85 per cent of marine litter is made up of plastics. Plastics in the ocean are a huge concern for environmental habitats and aquatic species. With an estimated eight million tonnes of plastic waste entering the global marine environment it is not surprising that if current trends of disposal continue there could be more plastic in the ocean than fish by 2050 (Ocean Conservancy and McKinsey Centre for Business and Environment, 2015).

There is so much to do regarding improving the plastic (and general) waste problems in the world. It is important to look at these problems on a large scale and then to divide the problem into smaller issues that influence the major issue. Single-use plastic shopping bags are represented relatively highly in many of the facts I have seen in the Ministry for the Environment 2018 plastic bag consultation document. Such as in Figure 1, it shows plastic bags are the fourth highest by count that were picked up in coastal clean-up data in New Zealand, important to note that the three categories ahead of plastic bags were all made of plastic of some sort.

Issues that single-use plastic shopping bags present are; easily seen as 'single-use', are very lightweight therefore travel in wind and water easily, currently only very small recycling schemes for these plastics in New Zealand, and that they are free to customers. Because of these issues, single-use plastic bags are used excessively with little consideration given to re-use, and thus end up disposed of, making their way to landfills, waterways and then the ocean. This phase-out will be an important step toward reducing the plastic waste we produce. It's a good starting point because this type of plastic is touched by a large portion of the population.

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)

The main reason I have chosen this option is for presentation purposes. Single-use plastic shopping bags under 70 microns in thickness still look like 'plastic' shopping bags. This leads customers on the path of little to no re-use of them. This is a key concept because if the bag does not look appealing and more like a reusable bag then it will not be re-used. Secondly, I think it is important for the bags to be of 70 microns or more in thickness, so they last longer and therefore will have a positive impact on reducing the amount of plastic waste being produced.

In Tasmania and the Australian Capital Territory there have been reports of shoppers buying heavier-weight bags but treating them as single-use bags (Ministry for the Environment, 2018).

This is clearly not the purpose of the thicker weight bags. It is also seen in some areas where the ban was imposed of for single-use bags up to 35 microns that retailers would instead use single-use bags barely larger than 35 microns, therefore making the ban basically meaningless.

Single-use shopping bags that are 70 microns or larger are also in comparison to 35 or 50 micron sized bags a lot heavier. When the lightweight bags make it into the environment they travel easily by wind, placing them in places we do not want. If a heavier bag of 70 microns or more makes it in the same environment it will be a lot harder for the wind displace it to other areas, for example, the ocean.

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?

I am aware that the mandatory phase out is to include single-use shopping bags made from plastic that are 'degradable', including 'biodegradable', 'compostable' and 'oxo-degradable'. Therefore, there is no exemption on those certain types of plastics. I am not sure if this is in reference to exemptions that may apply overseas or not.

4. Do you currently manufacture, sell, provide or import for sale or personal use these types of single-use plastic shopping bags:
- 50 microns or less in thickness
 - 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?

In Hong Kong a levy, which began in 2009 applied to 3300 larger retailers. The levy did not achieve the waste minimisation outcome sought, in 2015 the system was changed to include all retailers. In England in 2015, a similar concept was applied to their phase-out of single-use plastic shopping bags. It defined 'large retailers' as having more than 250 full-time employees. However, the British Government is looking at changing the ban to all retailers.

I think that number of full-time employees is not a good representation of the quantity a retailer would distribute in terms of single-use plastic shopping bags.

As mentioned in the Ministry for the Environment 2018 Single-use Plastic Bag Consultation document, smaller retailers would still be able to absorb the costs due to a change in use of single-use shopping bags by putting the cost back onto the customer. Therefore, I do not think any retailer should be exempt.

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?

I do not believe there is any reasonable way to define this based on number of full-time employees. Therefore, my number would be one full-time equivalent employee.

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?

I believe six months is a long enough time for companies and consumers to prepare themselves for the change in plastic bag use. The WTO Agreement on Technical Barriers to Trade have a set time of six months that appropriately sets exporters and importers with enough time to change production as required. They recommend six months and I agree. This was the period used for the phase-out of microbeads in New Zealand. There were no issues with the microbeads ban, therefore I believe it should run smoothly also. Customers already have alternatives to single-use plastic bags. Many are already using them, the customers who are not using them already, have access to them. Therefore, this would not be a problem.

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).

There are many reasons why I have chosen to agree here, and personally do not see how someone would be able to easily oppose the benefits that banning single-use plastic shopping bags will have.

I can only think of two negative impacts that banning single-use plastic shopping bags would have. Firstly, the producers of the bags may be forced to lower production, resulting in potential layoff of staff. This can put pressure on people to find a new job. Secondly that the consumer would need to purchase the alternative shopping bags which could cost \$1 or more. There are very few negatives to think about.

I will start by explaining some of the monetary or economic benefits that this ban would cause. Businesses that produce multiple-use shopping bags will be able to increase production and lead to an increase in employment opportunities. Parallel to this, new innovators could come up with better alternatives to plastic bags, therefore, the potential for companies to widen their research or production.

Companies will no longer need to provide mandatory single-use shopping bags, resulting in the potential for them to lower their prices which will benefit the consumer also.

The litter around our environment comes at a cost to the taxpayer. Therefore, a reduction in single-use plastic shopping bag litter will in turn reduce the amount that the environment needs to be cleaned up, in turn saving the tax payer money.

The reason this ban is planning being implemented is to better the natural environment. The plastic bag ban has many positive impacts on the natural environment. Single-use plastic shopping bags rarely make it into an environment where they can biodegrade or become compost. This ban will reduce the number of plastic bags in circulation, resulting up in less plastic bags as litter and less pollution. These plastic bags are also produced with a non-renewable energy source, this ban will minimise the dependency on the limited resource, petroleum.

Marine life and marine ecosystems will improve over time because less single-use plastic bags will be entering their environment. Marine species become part of the food chain. This can spread toxic pollutants that fish eat which is small partially degraded plastics. Plastic bags clog up drainage infrastructures, so a ban on plastic bags will increase drainage efficiency, minimising flood risks.

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?

New Zealand currently does have reasonably practicable alternatives to single-use shopping bags in my opinion. These are in the form of the multiple-use bags that are at least 70 microns in thickness. Supermarkets such as New World offer these alternatives already.

These multiple-use bags present themselves as an item that looks like it is made to be used many times, also are very durable, resulting in the customer being able to use the bag plenty of times before needing to replace it.

Over time better alternatives will be thought of, but in the meantime, I believe these alternatives are a good replacement to single-use plastic shopping bags that will help offset the current plastic waste trend in a positive 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)

In general, human nature causes people to love doing something and receive something else in return. Therefore, to encourage consumers to re-use multiple-use shopping bags a voluntary incentive scheme should be set up. New world has a five-cent rebate per bag for customers for customers using their own multiple-use bags instead of taking a single-use plastic shopping bag. Personally, I do not think this is a great incentive as it is only five cents per bag. A possible better scheme could be proving rewards dollars, or accumulating points toward a certain percentage off the next shop for example.

I support the idea of having an app created that would show to consumers the difference they are having on the environment by re-using multiple-use plastic shopping bags. When people can see this data as the shop in real time would be awesome. Representing this data on graphs or interactive apps really would help to capture the consumer and push them to keep re-using the multiple-use bags.

Having the opportunity to swap your worn-out reusable bag for free with a supermarket for example, where they then recycle it appropriately I believe is a very good scheme. People will not incur costs of buying new bags, and the worn-out bags will be recycled correctly, minimising the impact on the environment and reducing the amount of waste making its way into the oceans.

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

Personally, we already use multiple-use shopping bags, along with recycled cardboard boxes in the boot of the car to transport goods. I think on a general sense to help the community and nation adjust would be to make sure everyone knows about the changes that will occur. Government could fund more schemes for multiple-use plastic shopping bags being made from recycled material. For the lower income earning consumers who believe they cannot afford alternative shopping bags, have them compensated so everyone will have access to these.

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

I agree with the proposed monitoring for coastal litter that this consultation document has outlined. This is to design and build an open-sourced national litter database and train and support citizen scientists to gather beach litter data nationwide; design and build a litter education curriculum and train and support educators to deliver it.

I cannot provide any further input regarding data monitoring and would recommend leaving that up to the professionals.

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

In Conclusion I agree fully with this proposed mandatory phase-out of single-use plastic shopping bags. I believe that the positives resulting from this ban out-weight leaving the situation as is. This is a required step in becoming a cleaner New Zealand, and a cleaner world. Actions like this will cause further thoughts on plastics and better alternative we can use. I think regarding this situation we need to make sure that in banning these plastic bags we do not create another issue resulting from alternatives used etc.

References

Ministry for the Environment. 2018. Proposed mandatory phase out of single-use plastic shopping bags: Consultation document. Wellington: Ministry for the Environment.

Steffen W, Richardson K, Rockström J and 15 others. 2015. Planetary Boundaries: Guiding human development on a changing planet. *Science* 347(6223).

<https://www.factorydirectpromos.com/blog/pros-and-cons-of-a-plastic-bag-ban/> Accessed September 2018.

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 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.

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