



Dear Hon. Eugenie Sage, Associate Minister for the Environment

Re: Proposed Mandatory Phase out of Single Use Plastic Bags

Q1 Full support for the mandatory phase out of single use plastic bags

We fully support the mandatory proposed mandatory phase out of the sale or distribution of single-use plastic shopping bags in New Zealand, including those made of degradable plastic for these reasons:

1. **Environmental:** we agree with the Ministry's assessment of the problem particularly the low rates of recycling in New Zealand and the harm associated with plastics in the natural environment.
2. **A good first step for single use plastics:** We acknowledge that single use plastic bags are one of many types of plastics entering the environment and a small subset of all sources of marine plastics. However, they are a great starting point for New Zealanders as they are an everyday item and a critical first step in changing behaviour and social norms around single use plastic.
3. **Circular economy transition:** the phase out presents an opportunity to provide a working model of the circular model. We ask that MFE take the lead by advising on best practice around material choices for reusable bags, and by investigating and coordinating a closed loop, onshore recycling system for plastic reusable bags.

Compostable bags to be included in the phase out. There is currently no system in place to collect these facilities and not enough facilities to process them effectively. (A recent WasteMinz survey found that only two composting facilities in New Zealand are willing to take these bags in their facilities.)

Complete ban on all oxo-degradable bags. We call on the government to implement a total ban on oxo-degradable bags as they are a contaminant to recycling and are potentially worse for the environment than non-degradable plastic bags. They cannot be recycled or composted and [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.

Q2 Minimum of 70 microns for alternative bags

The minimum micron level for an alternative plastic bag should be 70 microns as this mean that retailers will be more likely to choose bags which are genuinely reusable. Any bag less than 70 is likely to be treated as a single use bag by customers, and so will limit the change in consumer behaviour and increase the number of thicker bags going to landfill.

Opportunity for transition to circular economy

The removal of single use plastic bags presents an opportunity for the Government and MFE to demonstrate commitment to the circular economy. There may be an opportunity to develop a closed loop circular system for reusable shopping bags, where the reusable bags are reclaimed at the end-of-use and recycled into another product (eg new reusable shopping bags). For this to happen, New Zealand would need a sizeable flow of clean material, a viable collection and sorting system and reprocessing capability (preferably onshore).

MFE should investigate the possibility of a closed loop, onshore recycling system for plastic reusable bags, and conduct a New Zealand specific LCA for alternatives to plastic bags which includes the costs

of plastic pollution in the marine environment. MFE should make the results of the investigation known to all retailers. MFE should advise retailers on best practice around materials for reusable bags (eg one material to facilitate recycling, choice of plastic for any onshore, closed loop recycling system). This should include the coordination of retailers to produce circular economy outcomes. We urge the government to utilise the WMF to set up a closed loop onshore recycling system, if one is viable.

Q3 No exemptions

No single use bags of any material should be available for free in New Zealand. We support any schemes that make it possible to remove the cost barrier for low income families to adopt new habits of taking their own bags shopping, such as a free one-off provision of up to 10 reusable bags.

Q5 Ban to apply to all retailers

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. New Zealand has many beachside communities with small dairies and takeaway shops. These kinds of retailers often provide single use bags for people wanting to picnic or eat takeaways on the beach where the likelihood of the plastic bag ending up in the environment is high. Consequently, exemptions for small retailers would be likely to lead to ongoing marine pollution.

Q7 Phase out period of 6 months

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. We believe a 6 month phase out period to be sufficient.

Q11 Government to fund and support behavioural change

We recommend the government develop and implement an educational campaign to support behavioural change. The campaign should involve simple positive messages to deal with the major sticking points such as bin liners and dog poo bags, including support for home composting education and composting collections. Removing food waste from kitchen bins enables householders to stop lining their bin with plastic bags as it removes most of the smell from their household waste.

Q12 Retailers required to provide collated data

Retailers should be required to provide collated data on single use plastics as part of a mandatory product stewardship scheme for single use plastics and packaging. Targets for reductions over time should be set and tracked.

Q13 Additional suggestions – support for retailers

Retailers should be provided information on:

- The most environmentally friendly alternatives to single use plastic bags.
- The need to avoid bags made from composite materials e.g. jute bags lined with plastic; paper bags with rope handles.
- The need to have certification for any reusable compostable bags
- The importance of providing disposal information (eg recycling, composting, landfill) on the bag for end-of-use.

We urge to government to help retailers to breakdown the regulatory barriers around food supply without reliance on single use plastics and without the burden of risk being all on the retailer.