

14 September 2018

Proposed Mandatory Phase Out of Single-use Plastic Shopping Bags
Ministry for the Environment
PO Box 10362
WELLINGTON 6143

plasticshoppingbags.submissions@mfe.govt.nz

Christchurch City Council submission on the Proposed Mandatory Phase-out of Single-use Plastic Shopping Bags

Christchurch City Council (the Council) thanks the Ministry for the Environment for the opportunity to provide comment on the proposed mandatory phase-out of single-use plastic shopping bags.

Please find attached a copy of the consultation questionnaire completed with the Council's responses.

For any clarification on points within this submission please contact Ross Trotter, Manager Solid Waste - Ross.Trotter@ccc.govt.nz .

Yours faithfully



Lianne Dalziel
Mayor of Christchurch



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*	Ross Trotter
Organisation (if applicable)	Christchurch City Council
Address	53 Hereford Street, Christchurch
Phone	64 3 941 8377
Email*	Ross.Trotter@ccc.govt.nz

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

Phasing out single-use plastics bags will help reduce litter and waste and responds positively to public concerns around plastic. Council supports the phasing out of single-use, disposal bags whether degradable, compostable, plastic or paper. We would place more emphasis on single-use, disposable aspect and less emphasis on the material. Bags that can easily be replaced with

reusable options should be the focus of greater regulation. If retailers simply switch to using 750 million paper bags instead of plastic each year, this would undermine the usefulness of the government intervention.

Despite this, our community and Council are concerned about the impact of plastic litter in the environment and the amount of plastic waste being landfilled. As an indication of this problem, eighty percent of Christchurch residents in a 2018 Natural Environment Survey said they regularly saw rubbish or litter in Christchurch waterways. For areas around Banks Peninsula litter was seen over half of the time by residents. Most of this litter was plastic.

We believe that our community is ready and willing to make the needed changes to avoid single use plastics. Supermarkets voluntarily phasing out plastic bags, the Lyttelton Farmers Market being plastic bag free, and the hospitality sector phasing out the use of plastic straws are examples of this readiness. Hospitality NZ, who represents approximately 40% of outlets are planning to be plastic straw-free by the end of 2018 (<https://hospitality.org.nz/sustainability>).

We believe that New Zealanders would want to play their part in reducing the amount of plastic in our oceans and so, would not want to be out of step with our neighbours and trading partners, many of whom have or are introducing rules to limit single-use plastics. For example the United Kingdom, France, China, California, parts of Australia and many of our pacific island neighbours have controls on single-use plastics (e.g. charges or bans on bags).

From a Council perspective, we support the internationally agreed waste minimisation hierarchy (the "four R's") that places "reduce" as a higher priority than "recycle" or "residual disposal". Avoiding waste is better and much more cost effective than having to manage it. It is also better to avoid or reduce plastic litter, rather than having to collect it from parks, rivers and coasts. Each year Council spends a significant amount on litter collection and disposal - after tree leaves and grit, much of the material collected is plastic and cigarette butts.

Plastic is also a significant solid waste issue. Approximately 20% of the waste landfilled in Christchurch is plastic. Of the waste collected from households at the kerbside, plastic is the second heaviest component behind organic waste. However, by volume plastic packaging would regularly fill most household rubbish bins.

Lastly, avoiding disposable bags is something that touches everyone - every household, school and business. Eliminating single use bags will challenge people to think differently about their purchasing decisions and daily habits. Just like kerbside recycling has influenced people's behaviours and values in Christchurch, daily use of reusable bags will encourage people to consider wider environmental issues and the impacts of consumption.

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 focus of this regulation should be short-lived, single-use bags, whether they are degradable, compostable, plastic or paper. Bags that can easily be replaced by reusable options must be the focus. This includes the classic light-weight supermarket bag (less than 35 microns), fresh produce bags (used to contain loose fruit or vegetables), and heavier bags often used by clothing, book or gift stores. It should not encourage switching to single-use disposal paper or compostable bags. Simply switching one disposal bag for another, would not be a meaningful intervention. Paper and "compostable" bags in the landfill would produce methane and leachate adding an avoidable environmental burden.

The Government may like to consider a phasing in of regulations for different types of bags to allow residents and retailers time to adjust and find solutions for the bags. For example supermarket carry bags could be banned within one year since most supermarkets are already making this commitment (<https://www.stuff.co.nz/business/97714989/new-world-matches-countdown-to-go-plastic-bag-free-by-2018>). This would simply reinforce existing commitments and ensure a level playing field is created with other retailers that use this type of bag.

Other types of carry bags such as fresh produce bags or heavier weight boutique bags could be banned at a later determined time (perhaps one year later).

All short-lived, single-use, disposal bags should be included within regulations to avoid retailers simply moving to a different weight of disposal bag.

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?

Once all reasonably practicable options have been explored, some exceptions could be considered on a case by case basis for example:

- A) Bags used to contain meat or fish that could contaminate other food if not properly contained, although traditionally paper sheets would have been used.
B) Bags used by Pharmacies to support patient privacy when carrying prescriptions.

Compostable plastics should not be exempt because few options exist for the composting these materials and because these must be landfilled, otherwise they contaminate recycling and composting services.

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.

Guidelines or standards around the design of reusable bags would be useful. Bags should be eco-designed considering their lifecycle impacts and end of life options. For example making them out of recycled materials, making them durable, washable and at the end of their useful life recyclable would be ideal. Tack-back schemes could be encouraged so bags are recycled through services offered by retailers to help avoid contamination in Council recycling services. We do not want to create another burden for the environment as we move away from single-use bags.

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 changes already underway by supermarkets and leading retailers will make it easier for smaller retailers to comply with new regulations, for example making reusable bags readily available for the public. To support consistent behaviours, to simplify communications and to simplify regulations, smaller retailers should not be excluded from the proposed new regulations. International evidence within the MFE discussion document, would suggest that simple and uniform interventions are more successful at achieving the desired outcomes.

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?

The Council does not consider smaller retailers should be exempted.

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?

Supermarkets and some leading retailers are already committing to phase out plastic shopping bags in 2018. Legislation would help to underpin these actions and provide a level playing field for other similar stores.

Other types of bags could be phased in over time, such as light-weight fresh produce bags. Some guidance and perhaps standards may be needed for reusable fresh produce bags, because tare

weights avoid customers being charged the weight of the bag (in addition to the produce). Allowing more time for these types of bags to be phased in would enable improved systems to manage this.

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).

Having key industry players already voluntarily eliminating plastic bags is an indication that the benefits outweigh costs. Especially when consumer expectations are taken into account. From a Council perspective avoiding solid waste and litter is significantly cheaper than handling it. Less contamination in the council provided recycling and composting services would also save significant costs and the landfilling of contaminated material. Environmental benefits would arise with less use of plastic and less impact on wildlife.

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?

Reusable bags

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)

Leading retailers are already informing customers about reusable options and many are encouraging their use to help establish new habits around bags. A key challenge is that people simply forget to have reusable bags with them when shopping. Prompts are needed to remind people in the kitchen, vehicle, wallet/purse, phone, at the door of malls or stores etc, about bringing a bag for shopping. Over time new habits will form making this second nature, but an information campaign would be useful to instil these new behaviours.

People may also want information about the choice of reusable bags. Some people will want to know more about the range of options available to choose the lowest impact bag. Information about the types of materials, their durability, ability to be washed, repaired, and what could happen at the end of the bags life (reused, recycled or disposed etc). Many people will want to make an informed choice, but little information currently exists around bag choice. As an example My Vita Bag states that it is organic, fair trade, washable and apparently able to be composted at the end of its useful life (<https://myvitabag.co.nz/>).

Guidance would be useful on the correct disposal or recycling of reusable bags. Often the community is confused about what plastics can be recycled through council services. The Christchurch City Council has some resources on its website:
<https://ccc.govt.nz/services/rubbish-and-recycling/>

Multi-lingual approaches should be considered and the use of visual information rather than text heavy communications.

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

Prompts reminding people to bring reusable bags when shopping, information about which reusable bags have the lowest impact, so people are better able to make an informed choice. Information about the correct disposal or recycling of end-of-life reusable bags. Takeback services run by supermarkets could facilitate the recycling of reusable bags and avoid contamination of council recycling services. Guidance on alternatives for lining household rubbish bins and collecting dog droppings would also be helpful.

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

Utilise data sources such as: industry records of avoided single-use plastic bags (reduction in bag use). Number of reusable bags sold. Reductions in household plastic waste disposal and council audits of recycling contamination. Records from litter monitoring and observations from community clean-ups of parks, rivers and coasts. Customer satisfaction surveys.

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

The Christchurch City Council strongly supports the Government's proposal to better manage short-lived, single-use bags. However, much of the plastic flowing through our economy, filling household rubbish bins and workplace skips and entering our landfills comes from packaging.

Council is aware that various New Zealand organisations exist that aim to reduce excessive packaging. However, with recent changes in global recycling markets and as packaging continues to become more complex, less and less can be recycled profitably. Far greater product stewardship is needed so packaging can be eliminated where possible and for material choices and designs to enable more profitable reuse and recycling options. Current trends of finding alternative down-cycling options (such as using plastics in roads) do not support a circular economy. Council would urge central Government to take a much more proactive approach with product stewardship programmes because it is only with industry we can find the urgently needed solutions. We cannot solve the problem by working at the bottom of the cliff.

Council is particularly concerned about plastics numbered 3 to 7. These are problematic to handle, have little value and ultimately are a burden placed on rate-payers by businesses. Much greater effort is needed in the eco-design of products and packaging to avoid waste and only produce items that can readily be repaired, reused, recycled or composted. Zero waste by design and greater stewardship of products is the only viable long-term solution to manage waste. Greater standards around these problematic plastics is also important to clarify what is actually recyclable or compostable. A Council position paper on the need for standards was provided to Ministers Parker and Sage in April 2018.

The proposal to phase out single use bags should also be extended to include other single-use items such as packaging material, coffee cups and straws, with the possibility of a staged phase-out period.

Council supports national responses to other problematic and harmful wastes such as tyres, refrigerants, agrichemicals and electronic wastes. Taking a national approach for these priority wastes is the most cost effective and pragmatic response.

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.

Submissions close at 5.00 pm on Friday 14 September 2018.