

10th October, 2013

Charlotte Yeabsley
Clerk of the Committee
Local Government and Environment Committee
NZ House of Representatives
WELLINGTON

Dear Ms Yeabsley

Petition 2011/48 of Kate Hoyle and 20 others

Thank you for giving the Packaging Council the opportunity to respond to this petition.

The purpose of the Packaging Council is to assist its members to minimise the environmental impacts of packaging and we are committed to championing solutions which are practical, cost effective and efficient.

Feasibility of a New Zealand-wide ban on single use plastic bags

We acknowledge the litter concerns raised about plastic bag litter and are supportive of efforts to reduce the overall consumption of plastic bags. In 2007 the Packaging Council began the 'Make a Difference' campaign in conjunction with the NZ Retailers Association to reduce the use of plastic shopping bags. Additionally, in the five years of the 2004 Packaging Accord, we reported a 157.4 million reduction in the overall use of plastic shopping bags.

We are not supportive of an outright ban and have outlined some of our reasons for this below:

- Plastic shopping bags provide a cost-effective and practical means for distributing merchandise at point of sale in supermarkets and in the general retail environment. They also often provide an important secondary use within homes for storage and ultimate removal of waste. Eliminating shopping bags would drive consumers to other similarly functioning products which could be of a much heavier gauge of plastic, ultimately resulting in more plastic being consumed rather than less.
- Plastic shopping bags are estimated to contribute less than 0.2% (by weight) to the entire waste stream in New Zealand. It is often the litter impact of plastic bags that contributes to the perception that they are a waste problem however by continuing to promote to the public the responsible use of plastic shopping bags, the retail sector is striving to alleviate this litter problem.
- Whilst the uptake of reusable shopping bags has provided a good alternative for those consumers who are particularly motivated to avoid plastic supermarket bags, it is important to note that for the most part these bags are also made of plastic. Reusable bags are not currently recyclable and still have a limited lifespan so will ultimately end up in landfills.

- Further some consumers have concerns around the hygiene of reusable bags. Studies¹ have shown that the material will support pathogens from products such as meat blood where this has leaked onto the bag. If the bag is subsequently used for fresh produce without proper cleaning, there are potential health hazards for the consumer.
- Research undertaken by the Australian Productivity Commission in 2006 into waste management found that:
 - only 0.8% of plastic bags become litter;
 - plastic bags account for 2% of all litter items (by number); and
 - around 2% (or AUD\$4 million) of annual expenditure on cleaning up litter is attributable to plastic bags.

The Commission also made the following points:

Plastic-bag litter has the potential to injure marine wildlife, including endangered species. However, claims that at least 100 000 animals are killed each year by plastic-bag litter are not supported by evidence. Such claims appear to be based on the misinterpretation of Canadian research on the impact of fishing nets. Some have also misinterpreted case studies of individual animals that have come into contact with plastic debris (not just plastic bags) as being representative of the overall impact of plastic-bag litter. The true extent to which plastic-bag litter injures populations of marine wildlife, as opposed to individual animals, is likely to remain very uncertain because it is extremely difficult to measure [Finding 8.6].

Based on the evidence available to the Commission, it appears that the Australian, State and Territory Governments do not have a sound case for proceeding with their proposed phase out of plastic retail carry bags. Similarly, there does not appear to be a sound basis for the Victorian Government's proposed per-unit charge on plastic bags. A cost-benefit study commissioned by the Governments shows that the benefits of a phase out or a per-unit charge would be significantly outweighed by the costs. This is because the policies would penalise most uses of plastic retail carry bags, whereas the potential benefit would only come from the small proportion of bags that are littered. A more cost-effective approach would be to target littering directly [Finding 8.7].

More recently in February 2011 the UK's Government Environment Agency published a life cycle assessment of plastic, paper and reusable bags² confirming that reusable bags are not inherently better for the environment than plastic bags.

In summary PAC.NZ's retail members are committed to the responsible use of plastic shopping bags, including reducing unnecessary use of bags, providing reusable bag alternatives and collaborating with other sectors to promote the recovery and recycling of plastic shopping bags.

Feasibility of a New Zealand-wide ban on single use plastic bottles

The Packaging Council is unclear why only water bottles are in this proposal. We are totally supportive of our membership offering water products to the consumer and would be concerned that banning water bottles from consumers who have made a conscious choice to drink a healthy drink seems unjustifiable.

We would also be concerned that banning the smaller format bottles would lead to an increase in sales of larger sized bottles which ultimately means that more plastic is on the market rather than less.

¹ Grocery Bag Ban & Food Borne Illness **University of Pennsylvania Institute for Law and Economics, Research Paper**
http://papers.ssm.com/sol3/papers.cfm?abstract_id=2196481

² <http://savetheplasticbag.com/ReadContent486.aspx>

We note that the overall aim of this proposal is to regulate all single use plastic products such as plastic bags and bottles to "*naturally lead to the elimination of such products*". While we do not believe that a petition from 21 signatories is a clear signal of widespread public support for such regulation, we are happy to engage in discussion on the far-reaching potential implications for consumers from eliminating particular products and packaging formats for food and beverage products.

Litter is a social issue, not a packaging issue and the Packaging Council strongly supports correct education about the disposal of food and beverage packaging, and personal responsibility as a more sensible solution than regulating particular products.

The Packaging Council has taken the liberty of canvassing those members and associations who are directly impacted by the petition and where appropriate have encouraged them to provide you with additional feedback and information to ensure that you are fully informed and are assured of good industry data and views about the wider implications of this petition.

We would be happy to make a representation of our position in person if the Local Government and Environment Committee chooses to hold hearings on this petition.

Yours sincerely
Packaging Council of New Zealand Inc

A handwritten signature in black ink, appearing to read 'S. Humphreys', written in a cursive style.

Sharon Humphreys
Acting Executive Director