

9(2)a

### Tēnā koe 9(2)a,

Thank you for your email of 30 January 2024 requesting the following information from the Ministry for the Environment (the Ministry) under the Official Information Act 1982 (the Act):

- 1. Any reports, emails, documents, memos, letters, notes and draft material reviewing the introduction of the 2019 single use plastic bag ban from the 1 July 2019 to 1 January 2024.
- 2. You also requested we answer the following questions if there are no specific reports reviewing the effectiveness at achieving its stated goals:
  - a. Why has no such report been completed?
  - b. Was it successful in reducing waste into the ocean, as claimed?
  - c. Can you break down the amount of plastic in the ocean for each of the 2017, 2018, 2019, 2020, 2021 and 2022 calendar years?
  - d. How much plastic is consumed in New Zealand each year?
  - e. Can you advise how much plastic is used in NZ for each of the above years?
  - f. How do you know the plastic bags haven't been replaced with other re-useable bags that may have a similar or worse environmental impact?
  - g. What actual evidence do you have that the plastic bag ban achieved its stated goals?
  - h. How much extra are consumers paying for bags after the ban?
  - i. How much has been spent on policy, enforcement and in total by the Ministry for developing and overseeing the ban?

The Ministry has provided a response to each of your questions below.

1. Any reports, emails, documents, memos, letters, notes and draft material reviewing the introduction of the 2019 single use plastic bag ban from the 1 July 2019 to 1 January 2024.

There has not been a formal review of the introduction of the 2019 single use plastic bag ban with a specific focus on its overall efficacy nor its environmental impacts.

The Ministry has identified two reports relating to the enforcement of the 2019 plastic bag ban. We note that these reports do not constitute a review of the overall effectiveness of the ban, but nevertheless provide general information on the ban's effectiveness from a compliance and enforcement lens. Both reports have been released to you in full.

The first report, titled *New Zealand Bag Ban - Retailer Engagement Program*, consists of data from a 2020 survey conducted by the Ministry.

263 retailers across New Zealand were surveyed about the bans asking questions around bag consumption, charges, and the understanding of the bans. One set of results showed that 71% of retailers reported that they now use fewer bags – not just plastic bags but any form of bag.

The second report, titled *Plastic Bag Ban Compliance Programme – Programme Report*, looks at retailer compliance of the plastic bag bans. The report covers the process of noncompliance reports, spot checks, advice and recommendations to retailers, comprehensive evidence of the success of the ban and real-world insights into retailer challenges, benefits, and support to inform future policy. A notable point in this report states "Many retailers reported witnessing a decrease in bag consumption since the ban and customers bringing their own bags or refusing a bag for small purchases. Retailers also found that by asking a customer if they need a bag rather than if they want a bag further decreased bag usage" (refer to page 20).

Regarding your request for emails about reviewing the introduction of the 2019 single use plastic bag ban, the Ministry completed a search of our email system using key terms including 'plastic bag', 'ban' and 'review', which returned over 3000 results. Therefore, we are refusing this part of your request under 18(f) of the Act as the information requested cannot be made available without substantial collation and research.

As mentioned above, there has not been any comprehensive review of the effectiveness of the 2019 single use bag ban. While the two documents outlined above relate to the compliance and retailers' experiences of implementing the ban, it is unlikely that the information contained in the aforementioned emails would be relevant to your request.

The Ministry ran a further, more targeted search of key terms included in email subject lines only, which returned 41 emails. The Ministry has completed an assessment and determined that these emails do not contain any information in scope of your request.

#### 2. a. Why has no such report been completed?

A formal review of the 2019 plastic bag ban has not yet been conducted by the Ministry. The two compliance reports that have been provided to you go part way towards completing a review on the ban's success, however Ministry resources were prioritised to deliver on the previous Government's work programme, meaning a comprehensive review was not completed.

#### b. Was it successful in reducing waste into the ocean, as claimed?

The Ministry does not hold exact data on the plastic bag ban's impact on ocean litter. Ocean litter, particularly plastic, is disperse and transboundary by nature and accordingly is challenging to quantify. Therefore, we must refuse this part of your request under section 18(g)(ii) as the information requested is not held by the Ministry and the person dealing with the request has no grounds for believing that the information is connected more closely with the functions of another agency.

However, you may be interested in the Litter Intelligence Dashboard which provides data on voluntary litter collection throughout waterways in New Zealand, as well as the Pacific Islands. The data can be filtered to narrow down your search by specific beach, freshwater and stormwater sites, litter types as well as dates. The dashboard can be accessed here: insights.litterintelligence.org/.

We note that this data is based on voluntary reporting and hours spent collecting litter. When interpreting this data, it is important to look at the amount of litter collected in the context of the volunteer hours spent collecting litter to get a more accurate portrayal of litter trends over time.

You may also be interested in the Keep New Zealand Beautiful National Litter Audit conducted in 2022 comparing the data to the previous audit conducted in 2019 looking at the litter trends in New Zealand. Although this report does not contain data specific to plastic bags or litter in the ocean, it is a good source for information on litter. You can find the full report here: https://www.knzb.org.nz/resources/research/national-litter-audit-2022/.

### c. Can you break down the amount of plastic in the ocean for each of the 2017, 2018, 2019, 2020, 2021 and 2022 calendar years?

As mentioned above, the Ministry does not hold the exact data on amounts of plastic in the ocean by calendar year. Please refer to the Litter Intelligence Dashboard provided in response to question 2.b. Using this dashboard, you are able to filter by year to find information regarding plastic bag pollution in the ocean. More information about litter in the ocean is available here: <a href="mailto:ellenmacarthurfoundation.org/plastics-and-the-circular-economy-deep-dive">ellenmacarthurfoundation.org/plastics-and-the-circular-economy-deep-dive</a>

### d. How much plastic is consumed in New Zealand each year? And

#### e. Can you advise how much plastic is used in NZ for each of the above years?

The Ministry has interpreted question d to mean how much plastic is *sold* in New Zealand on average each year. The Ministry does not hold the exact data of how much plastic is consumed and used in New Zealand each year as we do not have access to the exact sales data. Therefore, we must refuse question d and e of your request under section 18 (g)(ii) as the information requested is not held by the Ministry and the person dealing with the request has no grounds for believing that the information is connected more closely with the functions of another agency. However, you may be interested in the following publicly available sources:

- The Rethinking Plastics in Aotearoa New Zealand report. Refer page 214 for information on plastic use in New Zealand. The data on the referenced page is from the 2017 article "Production, use, and fate of all plastics ever made", published in the Science Advances journal. You can read the full report here: <a href="mailto:bpb-ap-se2.wpmucdn.com/blogs.auckland.ac.nz/dist/f/688/files/2023/04/Rethinking-Plastics-in-Aotearoa-New-Zealand Full-Report 8-Dec-2019 MC.pdf">bpb-ap-se2.wpmucdn.com/blogs.auckland.ac.nz/dist/f/688/files/2023/04/Rethinking-Plastics-in-Aotearoa-New-Zealand Full-Report 8-Dec-2019 MC.pdf</a>
- The Ministry's website gives an indication to how much plastic is used every year. This information was sourced from Scion's report *Making Zero the Hero* which includes data on plastic imports into New Zealand for 2019 and 2020 (refer pages 47 and 48). It is important to note the data challenges associated with accurately tracking the amount of plastic imported and used in New Zealand. The report is available here: <a href="mailto:scionresearch.com/">scionresearch.com/</a> data/assets/pdf file/0020/80606/MakingZeroTheHero-Full-Report.pdf#page=6&zoom=100,60,201
- The Regulatory Impact Statement provides information on New Zealand's consumption of plastic bags specifically, stating "Estimates of current single-use plastic shopping bag consumption in New Zealand range from 154 to 323 bags per person per year." (refer page 10), available here: <a href="https://www.treasury.govt.nz/sites/default/files/2018-12/ria-mfe-psp-dec18.pdf">https://www.treasury.govt.nz/sites/default/files/2018-12/ria-mfe-psp-dec18.pdf</a>

The report A New Path for Plastic also discusses plastic use in New Zealand, stating
"New Zealand manufactures about half a million tonnes of plastic products each year
from imported resins and plastic materials" (refer pages 6 and 7). The report is
available on the Ministry's website here: <a href="mailto:environment.govt.nz/publications/a-new-path-for-plastic/">environment.govt.nz/publications/a-new-path-for-plastic/</a>

We note that it is hard to capture the full picture of all plastic consumption/use in New Zealand. The Scion report emphasises that it is not currently possible to trace and quantify plastics imported as part of finished goods (such as electronics, toys, cars etc). Therefore, the available import data on plastic packaging and raw materials is only a part of the bigger picture of plastic materials imported and used in New Zealand.

## f. How do you know the plastic bags haven't been replaced with other re-useable bags that may have a similar or worse environmental impact?

Please refer to the "Proposed Ban on Single-Use Plastic Shopping Bags Consultation Document" Appendix 2: Comparing life cycle impacts of different types of shopping bags (pages 38 to 40), available here: <a href="mailto:environment.govt.nz/assets/Publications/Proposed-Phase-out-of-Single-use-Plastic-Shopping-Bags-with-Appendices.pdf">environment.govt.nz/assets/Publications/Proposed-Phase-out-of-Single-use-Plastic-Shopping-Bags-with-Appendices.pdf</a>

This analysis compares the different environmental impacts of a range of reuseable shopping bag types. The analysis also compares the impacts of international plastic bag bans, for example "Life-cycle analysis for Victoria (Australia) showed that reusable shopping bags have a lower net environmental impact than single-use plastic shopping bags for four impact measures: greenhouse gas emissions, litter production, energy use and water use."

The Ministry does not hold data on the number of reusable bags that have been bought specifically in lieu of single-use plastic bags. This could be calculated in part by obtaining sales data of reusable bags at retailers, such as supermarkets for example.

# g. What actual evidence do you have that the plastic bag ban achieved its stated goals?

As per the Regulatory Impact Statement (link provided in response to question 2.e above), the primary goal of the plastic bag ban is to: "address, in a practical way, widespread reliance on a single-use everyday item that can be easily replaced by accessible and more sustainable alternatives. This will serve to build experience in, and public support for, practical measures to reduce our reliance on linear approaches that provide temporary benefits and lasting costs, and design waste and pollution out of the system while maintaining prosperity."

As of the second anniversary of the plastic bag bans, it is estimated that more than 2 billion plastic bags have been taken out of circulation (refer <a href="mailto:environment.govt.nz/news/aotearoa-celebrates-two-years-of-plastic-bag-ban-success/">environment.govt.nz/news/aotearoa-celebrates-two-years-of-plastic-bag-ban-success/</a>).

The plastic bag bans built the foundations for behaviour change which contributed to the implementation of other waste initiatives including the single-use and hard-to-recycle plastic phase outs that have gone through two tranches, the last in July 2023 where single-use produce bags were also banned. For more information please refer to <a href="mailto:environment.govt.nz/what-government-is-doing/areas-of-work/waste/plastic-phase-out/">environment.govt.nz/what-government-is-doing/areas-of-work/waste/plastic-phase-out/</a>.

#### h. How much extra are consumers paying for bags after the ban?

The Ministry does not hold any information about how much extra consumers are paying for bags since the introduction of the 2019 plastic bag ban. Due to the differing prices in reuseable bags, we recommend contacting retailers directly to obtain more accurate sales data.

The Regulatory Impact Statement outlines the expected costs to different groups of implementing the ban (refer page 25 for summary table), and pages 5 to 6 also mention the expected costs of the plastic bag ban. We note that this analysis was undertaken prior to the implementation of the ban, but nevertheless sets out the rationale for why the benefits of the ban outweigh the overall costs. The intent of the ban was to encourage consumers to shift away from single-use bags, and implementing a cost at the point of purchase for shopping bags is a mechanism for shifting this behaviour.

## i. How much has been spent on policy, enforcement and in total by the Ministry for developing and overseeing the ban?

The plastic bag ban work was undertaken alongside other waste-related policy work. It is difficult to accurately identify the costs specific to the plastic bag ban or demarcate policy work from enforcement work. We estimate the Ministry spent approximately \$500,000 on the policy and enforcement aspects of the plastic bag ban from July 2017 through to January 2024.

You have the right to seek an investigation and review by the Office of the Ombudsman of my decision to withhold information relating to this request, in accordance with section 28(3) of the Act. The relevant details can be found on their website at: <a href="https://www.ombudsman.parliament.nz">www.ombudsman.parliament.nz</a>.

Please note that due to the public interest in our work the Ministry for the Environment publishes responses to requests for official information on our <u>OIA responses page</u> shortly after the response has been sent. If you have any queries about this, please feel free to contact our Ministerial Services team: ministerials@mfe.govt.nz.

Nāku noa, nā

Shaun Lewis,

General Manager – Waste Systems Ministry for the Environment | Manatū Mō Te Taiao