



ZWN Guide to the Hard-to-Recycle and Single-Use plastics consultation 2020

The Government is proposing to move away from hard-to-recycle plastics via a mandatory phase-out. This means, over time, a range of hard-to-recycle and single-use plastics will be banned from use and manufacture in Aotearoa New Zealand.

This consultation document is seeking feedback on the Government's proposals to phase-out:

- some polyvinyl chloride (PVC) and polystyrene packaging
- all oxo-degradable plastic products.

This is part of a long-term shift toward a more circular economy for plastics where packaging materials are made of higher value materials that are easier to recycle.

The Government is also seeking feedback on a phase-out of some single-use plastic items. Moving away from single-use items in the future will help to encourage reuse, reduce waste to landfill, and minimise harm to the environment from plastic litter.

For more information check out [this explainer](#) (opens as a PDF) and a [detailed joint submission here \(opens as a PDF\)](#).

This consultation closes at 5pm on 4th November 2020.

Complete your submission online [here](#).

Read the full consultation document [here](#).

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, the Ministry for the Environment will consider that you have agreed to have your submission and your name posted on its website.

In your submission, please indicate if you prefer your name not be included in the published summary of submissions. If you have any questions about the publishing and releasing of

submissions, or if you would like to access or correct any personal information you have supplied, please email info@mfe.govt.nz

Question	ZWN Comments/Notes
<p>1. Do you agree with the description in this document of the problems with hard-to-recycle plastic packaging and single-use plastic items? If not, why?</p>	<p>Yes</p> <p>This proposal will bring Aotearoa New Zealand in line with overseas current best practice</p> <p>The proposed policy should be supported by comprehensive regulatory roadmap to target reliance on single-use products in general and reduction of virgin plastic resin usage.</p>
<p>2. Have we identified the correct objectives? If not, why?</p>	<p>Yes in part</p> <p>This policy is a necessary precondition for the transition to a circular economy.</p> <p>The main objective should be amended to: <i>“reduce the impact on our resource recovery system and environment from hard-to-recycle plastic packaging and single-use items through significantly reducing the amount in use, increasing the scale and uptake of reuse systems, and increasing safe recycled content in packaging and systems that support the increased recyclability of each product.”</i></p> <p>An additional secondary objective should also be added: <i>“making affordable reuse alternatives accessible across New Zealand while supporting community-based engagement which assistings communities to use them and to benefit from the increased employment opportunities that reuse economies offer.”</i></p>
<p>3. Do you agree that the options listed for shifting away from hard-to-recycle and single-use plastics are the correct options to consider? If not, why?</p>	<p>Yes</p> <p>We believe these options could be blended to support a long-lasting and effective move away from reliance on all single-use items and to avoid unintended outcomes from a ban.</p>
<p>4. Have we identified the right criteria (including weightings) for evaluating options to shift away from PVC and</p>	<p>Yes</p>

<p>polystyrene packaging, oxo-degradable plastics and some single-use items? If not, why?</p>	<p>More weight should be given to how well each option aligns with strategic direction to ensure highest ranking outcomes sit highest up the waste hierarchy.</p>
<p>5. Do you agree with our assessment of the options, and our decision to take forward only one option (a mandatory phase-out)? If not, why?</p>	<p>Yes in part We support mandatory phase-outs of all the items listed (with the exception of plastic straws).</p> <p>We would like to see positive regulatory and policy options implemented alongside a ban to support reuse alternatives and increase recycled content in products.</p>
<p>6. Do you agree with the proposed phase-out of PVC and polystyrene packaging as set out in two stages (by 2023 and by 2025)? If not, why?</p>	<p>Yes However the proposed time-frames are too slow. We suggest: PVC trays being phased out by June 2021</p> <p>All other food and beverage items that contain PVC packaging and some food and beverage items that contain polystyrene packaging being phased out by June 2022</p> <p>Stage 2 by June 2023</p>
<p>7. Have we identified the right packaging items that would be covered by a phase-out of PVC and polystyrene packaging? If not, what would you include or leave out, and why?</p>	<p>Yes Thank you for this comprehensive list of products proposed for a phase-out.</p>
<p>8. Do you think we should include all PVC and hard polystyrene packaging in stage 2 of the phase-out (eg, not just food and beverage and EPS packaging)? Please explain your answer.</p>	<p>Yes</p> <p>PVC is commonly used in consumer packaging in non food and beverage contexts. Any PVC or hard polystyrene packaging can become a contaminant in the 'easy-to-recycle' plastic streams, so it's better to be consistent and phase-out all hard PVC and PS packaging.</p>
<p>9. What would be the likely costs or benefits of phasing out all PVC and polystyrene packaging (hard polystyrene and EPS) by 2025?</p>	<p>Benefits: PVC is a contaminant in the recycling stream. Phasing it out will help to provide high quality PET to reprocessors. EPS is not widely recyclable and creates plastic litter which harms our waterways and persists in the environment for hundreds of years. Phasing it out will help protect our waterways and soils.</p>

<p>10. Do you believe there are practical alternatives to replace hard-to-recycle packaging (PVC, polystyrene and EPS)? If not, why?</p>	<p>Yes</p>
<p>11. Do you agree with a mandatory phase-out of all oxo-degradable plastics by January 2023? If not, why?</p>	<p>Yes The quicker we get rid of these, the better, so we would like the phase-out of these to happen by June 2021</p>
<p>12. If you manufacture, import or sell oxo-degradable plastics, which items would a phase-out affect? Are there practical alternatives for these items? Please provide details.</p>	<p>n/a</p>
<p>13. Have we identified the right costs and benefits of a mandatory phase-out of the targeted plastics? If not, why not? Please provide evidence to support your answer.</p>	<p>Yes, though a more holistic assessment of the costs and benefits that does not separate the environment out as an "affected party" distinct from human society and our economy would be helpful/more meaningful.</p>
<p>14. How likely is it that phasing out the targeted plastics will have greater costs or benefits than those discussed here? Please provide details to explain your answer.</p>	<p>An additional benefit is the opportunity for businesses and community enterprises to develop reuse schemes and reusable packaging systems. The mandatory phase-out of the targeted single-use items is likely to also lead to a reduction in other single-use packaging, due to changing social norms and more availability of reuse schemes.</p>
<p>15. What would help to make it easier for you and your family, or your business/organisation to move away from hard-to-recycle plastic packaging and use higher value materials or reusable/refillable alternatives?</p>	<p>Increased scale and uptake of reusables would assist the move, which would require regulatory and policy measures to level the playing field between single-use and reuse, nationwide infrastructure to support reuse (such as washing facilities), combined with funding for locally-based community engagement. Mandatory recycled content for plastic packaging and products, more transparency & onshore reprocessing facilities and better designed collection and sorting systems for recycling would help ensure that higher value plastics</p>

	collected for recycling in New Zealand actually get reprocessed.
<p>16. What do you think about the proposed mandatory phase-out of some single-use plastic items (see table 7)?</p>	<p>Agree</p> <p>We fully support the mandatory phase-out of all of the listed single-use plastic items, except for plastic straws.</p> <p>We believe that consultation with the disabled community about a possible straw ban and/or exemptions should take place before any decision is made to ban plastic straws.</p> <p>We do not support exempting the following from the ban:</p> <ul style="list-style-type: none"> ● Single-use coffee cups & lids ● Single-use plastic cups and lids made of plastics 1, 2 and 5 <p>We support the list being extended to include these other single-use plastic items:</p> <ul style="list-style-type: none"> ● Plastic lollipop sticks ● Single-serve pottles, sachets & containers for condiments and toiletries ● Teabags and coffee pods containing plastic ● Single-use plastic water bottles ● Balloons and balloon sticks ● Glitter and plastic confetti ● Complementary plastic toys <p>We would also support a strategic plan to tackle wet wipes and other disposable sanitary products, and cigarette butts, as well as to reduce the harm from industrial plastics like fishing nets.</p>
<p>17. Do the proposed definitions in table 7 make sense? If not, what would you change?</p>	<p>Yes with changes</p> <p>We strongly support the proposal to include items made of degradable, oxo-degradable, biodegradable and compostable plastics.</p> <ul style="list-style-type: none"> ● Single-use plastic tableware: We suggest altering the proposed definition to include paper bowls and containers with plastic or wax linings

	<ul style="list-style-type: none"> • Single-use plastic produce bags: We suggest this definition is broadened to include within the scope of the phase-out plastic net bags
<p>18. What would be an appropriate phase-out period for single-use items? Please consider the impact of a shorter timeframe, versus a longer timeframe, and provide details where possible.</p>	<p>12 months for everything except single-use cups</p> <p>2 years for single-use cups to allow time to implement reuse infrastructure, collaboration with businesses and undertake community engagement</p>
<p>19. What options could we consider for reducing the use of single-use coffee cups (with any type of plastic lining) and wet wipes that contain plastic? You may wish to consider some of the options discussed in this consultation document or suggest other options.</p>	<p>Coffee cups</p> <p>We believe the most impactful role for the Government is to use regulation, policy & investment to increase the uptake, accessibility (including affordability), reach and availability of reusable alternatives.</p> <p>We support the Government:</p> <ul style="list-style-type: none"> - investing in scaling up reuse systems, such as regional/localised washing/sterilisation facilities - implementing regulatory and policy interventions that remove some of the barriers to reuse schemes growing, including a levy or fee on disposable coffee cups, deposit return schemes for takeaway cups, and mandating 'reusables only' for dine-in contexts and public buildings. - providing funding to NGOs and community groups with track-records of engaging their communities on zero waste as the most efficient way to invest in behaviour change <p>Wet wipes</p> <p>We support transitioning from wet wipes containing plastic to those not containing plastic as soon as practicable.</p> <p>In the meantime, we would support:</p> <ul style="list-style-type: none"> - investment in community engagement around reusable alternatives and the problems associated with wet wipes (i.e. release of plastic into waterways and blocking of sewerage systems)

	<ul style="list-style-type: none"> - compulsory labelling requirements to inform users of how to dispose of them correctly and to prohibit use of the word “flushable” on the product packaging
20. If you are a business involved with the manufacture, supply, or use of single-use plastic coffee cups or wet wipes (that contain plastic), what would enable you to transition away from plastic based materials in the future?	n/a
21. What do you consider an appropriate timeframe for working toward a future phase out of plastic lined disposable coffee cups and wet wipes containing plastic?	<p>Coffee cups</p> <p>With formal Government regulatory, policy and financial support for reuse systems and community engagement, we believe individual towns can meet their goal of being single-use cup (SUC) free by 2022.</p> <p>Replicating the successes of those towns could lead to a SUC free Aotearoa by 2023.</p> <p>Wet wipes</p> <p>We would support transitioning from wet wipes containing plastic to those not containing plastic (and that will not block sewers and form ‘fat bergs’) as soon as practicable e.g. by Jan 2022.</p>
22. Have we identified the right costs and benefits of a mandatory phase-out of single-use plastic items? If not, why? Please provide evidence to support your answer and clarify whether your answer applies to a particular item, or all items.	<p>Yes</p> <p>The list of costs & benefits is comprehensive and we agree with them all.</p> <p>Additional benefits are offered by the opportunity for businesses and communities to develop reuse schemes and reusable alternative products to replace the items that have been phased out. This includes employment opportunities.</p>
23. How should the proposals in this document be monitored for compliance?	We support MfE creating a compliance, monitoring and enforcement strategy.

	The community can assist by reporting breaches to MFE.
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For more information on this guide, feel free to contact Dorte Wray on dorte@zerowaste.co.nz