



27 November 2020

Reducing the impact of plastic consultation
Ministry for the Environment
PO Box 10362
Wellington 6143

Via email to: plastics.consultation@mfe.govt.nz

Submission on the Reducing the impact of plastic consultation

The Hurunui District Council thanks the Ministry for the Environment for the opportunity to comment on the Reducing the Impact of Plastic on our Environment Consultation Document.

The Hurunui District is located in North Canterbury. We have approximately 12,500 residents and cover an area of 8,600km² of predominantly rural land. Our District spans from the east coast to the Main Divide. The Hurunui District is primarily a primary producer characterised by small service towns and vast distances to markets.

Council runs five transfer stations across the District located in Amberley, Cheviot, Culverden, Hanmer Springs and Waiau. We also carry out kerbside collection in many areas throughout the District.

A user pays bag system for refuse and recycling is the main method of waste and recycling collection and bags can be attained from various distribution places. Bags are picked up through kerbside collection and deposited at the transfer station. The transfer station also offers the opportunity to deposit waste and recycling directly.

Council has found that using clear bags means that we continually have less than a 1% contamination rate of our recycling. This means almost all of our recycling actually ends up being recycled. As a result of these bags, no recycling has been rejected at EcoCentral in Christchurch, a significant achievement, particularly in light of recent changes to the acceptance criteria and Covid. Moreover, we find the system is easy to educate. If the recycling is contaminated, our waste collectors apply a label on the bag advising the owner why the bag has been rejected. Across our whole District we only have to label up to 5 bags per week (these are usually in our holiday town of Hanmer Springs).

Until the plastic bag ban, we were able to recycle the used plastic recycling bags via EcoCentral, however Council is keen to identify an outlet able to recycle this form of soft plastic at an affordable cost.

The Consultation Document sets out a range of questions which we provide answers to the relevant questions below.

Defining hard to use recycle plastic packaging

- 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?*

Council supports the definition of hard-to-recycle plastic packaging. Council currently only accepts rigid plastic types 1, 2 and 5. This is the case across Canterbury.

2. *Have we identified the correct objectives? If not, why?*

Council supports the main objective particularly the approach of significantly reducing the amount of plastic used. The secondary objectives seem to cover the major issues.

Identification and assessment of options

3. *Do you agree that these are the correct options to consider? If not, why?*

4. *Have we identified the right criteria (including weightings) for evaluating options to shift away from PVC and polystyrene packaging, oxo-degradable plastics and some single-use items? If not, why?*

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?*

Council agrees with the options evaluated – this seems to be a comprehensive list and covers all bases. We are comfortable with the assessment criteria used but do have some concerns with the conclusions drawn in Table 3 given the uncertainties in the information used to reach that conclusion.

A mandatory phase-out comes at a significant cost to small businesses and will not necessarily achieve all of the objectives. In particular, it is unlikely to reduce public confusion around recycling or address issues with contaminated recycling. The assessment seems to miss opportunities to implement a variety of measures simultaneously to achieve the various objectives. For example, a combination of improved/simplified labelling on recyclables, improved education and a slower mandatory phase out may meet the objectives at a lower cost.

Proposal 1: Phase out hard-to-recycle plastics

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?*

11. *Do you agree with a mandatory phase-out of all oxo-degradable plastics by January 2023? If not, why?*

Council supports realistic timeframes for phasing out PVC and polystyrene packaging. Some businesses are already moving away from using these products. We do have concerns with the tight timeframes of the mandatory phase out if this is to occur by January 2023.

There is a risk that if change is forced we will end up with maladaptation. For example, a pizza box is made out of cardboard but can't be recycled as it has been contaminated and has a waxy coating. There is a risk that as we move away from plastic the favoured alternative might also be single use.

While pressure needs to be put on to ensure change does occur, the timeframes need to be suitably realistic to ensure that the solution does not create a bigger problem.

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.*

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.*

The benefits table and subsequent summary states that a mandatory phase out will:

- help to clean up our kerbside recycling system, making it more likely that the materials collected can be recycled effectively
- save costs for local government and the waste industry, who will have less contamination and complexity in the recycling system, and less litter
- reduce confusion for retailers and brand owners, by removing some of the hard-to-recycle and harmful materials from the system, making it easier for them to invest in more sustainable materials.

However, we note that recycling contamination is not limited to incorrectly recycled plastics but includes general waste and unclean correctly recycled plastics as well. It is not clear how a mandatory phase out will improve public attitudes towards recycling. Moreover, EcoCentral are currently experiencing problems with high levels of recycling contamination through recycling gathered through wheelie bin collections. A mandatory phase out would not improve this.

It is also not clear how a mandatory phase out will reduce litter. For example, the document suggests that plastic takeaway containers are replaced with cardboard containers. While a mandatory phase out may reduce plastic litter it will not necessary reduce the amount of overall litter as suggested. Moreover the cardboard containers if used for food are likely to be contaminated and therefore unable to be recycled.

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?*

To encourage a move away from hard-to-recycle plastic packaging and improve recycling practices are some options are:

- **Easy to read labels** – While most people know to look for the recycling label, the system is complicated as only some products with a label are recyclable. Moreover, which products can be recycled varies across New Zealand. Labelling could be as simple as whether something can be recycled or not.
- **Incentives for recycling** – Overseas there are examples where if you recycle you get money back. There are opportunities for such scenes in New Zealand to encourage individuals to recycle certain products.
- **Incentives for moving away from single use products** – While this proposal excludes single use coffee cups, there are opportunities to incentivise the use of reusable products such as charging a small fee for a single use cup or having free water bottle refill locations around New Zealand.
- **Realistic and practical alternatives** – Prior to a mandatory phase out there needs to be a suitable alternative that does not just transfer the problem to another hard-to-recycle product. This should focus on locally manufactured alternatives.
- **Education** – When the changes are rolled out there needs to be clear and straightforward messaging to help people do the right thing.

Proposal 2: take action on single-use plastic options

16. *What do you think about the proposed mandatory phase-out of some single-use plastic items (see table 7)? Please specify any items you would leave out or add, and explain why.*

17. *Do the proposed definitions in table 7 make sense? If not, what would you change?*

Council is of the view that all of the items targeted by table 7 are comparatively small and inconsequential. We support the inclusion of things like produce stickers, straws and cotton buds but

believe there is capacity to include bigger items such as plant pots and trays, election hoardings and construction waste.

We are also of the view that the government needs to be bolder and address more controversial waste items such as disposable nappies. We acknowledge that these have an element of convenience but note that there are alternatives and if pushed the market will develop other more convenient alternatives.

We are generally supportive of including items on the list provided. However we are unsure why exemptions are necessary for disabled persons and medical purposes. It would seem the alternatives are available to provide for these purposes and the definition would be expanded to include a thickness of plastic. It would seem exemptions such as allowing catering establishments to provide a straw on request is a soft option and does not truly phase out single use straws as there will remain a need to import them and a catering establishment will not be able to ask whether the person requiring the straw is disabled or not.

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. a) 12 months? b) 18 months? c) 2 years? d) 3 years? e) Other? If you think some items may need different timeframes, please specify.*
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.*

Given the pressures on small businesses a three year phase-out period seems appropriate. The timeframe needs to consider the flow on cost to the customer. In some instances, time is going to be required to develop a cost-effective and environmentally-friendly alternative. This could vary between products where suitable alternatives are already available.

We also note that Covid has introduced issues with the supply chain. This may impact the time it takes for practical alternatives to be available. Focus should be on supporting locally produced alternatives.

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.*
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?*

Council is of the view that greater action needs to be taken on reducing single-use coffee cups. We consider that there are alternative options available currently.

- **Reusable coffee cups** – These are readily available and there are affordable options available already. Those that can afford to buy takeaway coffee can afford the \$10-15 for a reusable cup. Cafés could stock reusable cups and offer the first coffee free on the purchase of one.
- **Cups for tourist** – It could be argued that tourists have a greater need for single use cups due to their limited stay however tourists are more likely to drink their coffee at a café or have disposable money to spend on a reusable cup. There is also an option to use the ban to promote our climate change action. This could include the option to purchase a New Zealand survival pack at the airport including a reusable shopping bag, reusable drink bottle and reusable coffee cup. Alternatively, given the money spent dealing with reusable coffee cups there could be merit in gifting a kiwi-themed reusable cup to tourist on arrival as a welcome gift.
- **Incentives** – Cafés should be encouraged to offer greater incentives to bring reusable cups. For example, some cafes offer a small discount to customers who bring a reusable cup or offer deals such as ‘your first coffee free’ if you purchase a reusable cup from the café.

Council is also of the view that stronger action needs to be taken on banning wet wipes. Biodegradable wet wipes are already on the market and there are options to make this a cost effective solution for those who use them. Wet wipes are a huge problem in our sewerage networks as well and this is an opportunity to address two issues simultaneously.

Compliance, monitoring and enforcement of regulations

23. *How should the proposals in this document be monitored for compliance?*

There is limited information included in the proposal about monitoring. It is unclear whether monitoring will be targeted towards small businesses or at the manufacturers. We support monitoring focused on manufacturers.

Yours sincerely,

Marie A Black.

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