



8 December 2021

Proposed Product Stewardship Regulations
Ministry for the Environment
PO Box 10362
Wellington 6143

Dear Sir/Madam

Hurunui District Council Submission to “Proposed product stewardship regulations: Tyres and large batteries”

Thank you for the opportunity to submit on the proposed “Proposed product stewardship regulations: Tyres and large batteries”. Please find attached the Hurunui District Council’s (the Council’s) submission regarding these proposed regulations.

Should you have any queries regarding the content of this document, please contact Sally Cracknell, Team Leader Waste on 027 240 1107 or by email: sally.cracknell@hurunui.govt.nz

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

Regards

Marie Black, Mayor (on behalf of the Hurunui District Council)

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Question 1

Do you agree in principle that a regulated framework should be introduced to ensure effective stewardship for: a. end-of-life tyres? b. end-of-life large batteries? If not, why not?

Yes – Hurunui District Council (Council) agrees that a regulated framework should be introduced to ensure effective stewardship for both end-of-life tyres and end-of-life large batteries.

Question 2

Do you agree with the proposal to make it mandatory to sell a product only in accordance with an accredited scheme for: a. tyres? b. large batteries? If not, why not?

Yes – The Council agrees with the proposal to make it mandatory for both tyres and large batteries to be sold in accordance with an accredited scheme.

Question 3 -

If you had to take part in a proposed scheme, how would this affect your business? a. For tyres – Tyrewise scheme (appendix 1) b. For the large battery scheme (appendix 2) Please give details or anticipated costs, benefits and other impacts.

For the Council to take part in the proposed scheme for tyres it could potentially mean a significant increase in the volumes received, creating additional extra handling and storage costs.

The proposal is not clear regarding whether collections from farms or businesses would be possible. Hurunui District covers a wide geographical area and Council would support the scheme undertaking collections from large operations or generators of tyres in the district. The Council supports licencing operators responsible for collecting tyres under the proposed scheme, as this will provide customers with the confidence that only appropriate disposal methods are being used by certified collectors.

For Council to participate, administration costs would increase due to recording information when receiving large batteries and submitting claims. Consideration would also need to be given to storage and safety. The proposal does not indicate what will be classified as an approved site, so the Council recommends those undertaking work installing or removing such batteries be deemed approved sites.

Question 4

Do you agree with the proposal to set a product stewardship fee on imported or domestic manufactured products to cover the end-of-life management for: a. tyres? b. large batteries? If not, why not?

Yes – The Council agrees with the proposal to set a product stewardship fee on imported or domestic manufactured products to cover the end of life management and agree the responsibility for the cost of the disposal should be charged for at the beginning of the product's life.

Question 5

Tyre stewardship fee The Government is considering three entities to collect the tyre fee.

Do you agree with the proposed fee collection entities at different points of entry to the market? a. New Zealand Customs Service at the point of import for loose tyres. b. New Zealand Customs Service or the product stewardship organisation (PSO) for tyres attached to imported off-road vehicles. c. Waka Kotahi New Zealand Transport Agency or the PSO for tyres attached to vehicles at point of first vehicle registration. d. The PSO for tyres made in New Zealand. If not, why not?

Yes - the Council agrees with the tyre fee being collected at the entry point (import) to the market and agrees the fee should be paid as early as possible in the products life.

The Council recommends that New Zealand Customs Service at the point of entry be responsible for receiving the tyre fee.

Question 6

Large battery stewardship fee The Government is considering two entities to collect the large battery fee (see figure 3 and table 5). Do you agree with the proposed fee collection entities at different points of entry to the market? a. The product stewardship organisation (PSO) for large batteries imported loose, imported attached to off-road vehicles, or made in New Zealand. b. Waka Kotahi New Zealand Transport Agency or the PSO for large batteries attached to vehicles at point of first vehicle registration. If not, why not?

Yes - the Council agrees with the large battery fee being collected at the entry point (import) to the market and agrees the fee should be paid at the beginning of the products life and recommends that New Zealand Customs Service at the point of entry be responsible for receiving the large battery fee.

The Council concludes that by customs receiving payment of both the tyre and large battery fee, duplication of services would be avoided, with payment being via a one stop shop for both products.

Question 7

Do you agree with the proposal that the Ministry will recover the costs of monitoring the performance of the accredited scheme from the scheme manager? If not, why not?

Yes - the Council understands deducting the costs of monitoring the performance of the accredited scheme will be necessary and understands it is necessary to ensure the scheme is achieving its objectives and supports this cost being absorbed in the purchase price of these products.

Question 8

The Government proposes to set minimum expectations for the product stewardship organisation to provide an effective product collection service, including targets for recovery, reuse and recycling, and to report on these targets. Do you agree with this for: a. tyres? b. large batteries? If not, why not?

Yes - the Council supports the Governments proposed expectations for both tyres and large batteries for the proposed stewardship organisation.

Question 9

Do you agree with the proposal to set quality standards for: a. transporting, storing and processing large batteries? b. eligibility for tyre stewardship incentive payments? If not, why not?

Yes - the Council agrees with establishing quality standards as a method of ensuring environmental harm resulting from the transportation, sorting and processing of large batteries is reduced.

The Council also supports the setting of quality standards to meet and ensure eligibility for tyre stewardship incentive payments.