

# **SUBMISSION**

by the



PACKAGING COUNCIL  
OF NEW ZEALAND (INC)  
(PAC.NZ)

to the

**Local Government and Environment Select Committee**

on the

**ENVIRONMENTAL REPORTING BILL 2014**

**17<sup>TH</sup> APRIL 2014**

## 1.0 Introduction

This submission is from:

Sharon Humphreys  
Acting Executive Director  
Packaging Council of New Zealand (Inc)

### Postal address

PO Box 58899  
Botany  
Auckland 2163

### Physical address

77 Greenmount Drive  
East Tamaki  
Auckland 2013

Tel: (09) 271 4044

Email: sharon@packaging.org.nz

- 1.1 The Packaging Council of New Zealand's role is to represent the interests of industry in public policy and debate on packaging issues, including reducing the environmental impact of packaging through cost effective solutions and product stewardship.
- 1.2 The Packaging Council represents the whole packaging supply chain, including raw material suppliers, packaging manufacturers, brand owners, retailers and recycling operators.
- 1.3 We represent more than 80% of the packaging manufacturing industry and 75% of New Zealand's top 100 food and grocery brands. Packaging Council members represent approximately NZ\$20 billion within the New Zealand economy.
- 1.4 The Packaging Council has been directly involved in the development of environmental policy affecting packaging from 1996 when it signed the first New Zealand Packaging Accord. The organisation was involved in developing the 2002 New Zealand Waste Strategy, provided data for the 2006 review of targets and assisted with the research behind the Parliamentary Commissioner for the Environment's 2006 report '*Changing behaviour: Economic instruments in the*

*management of waste*'. The Packaging Council was a principle signatory to the second New Zealand Packaging Accord (2004 – 2009).

- 1.5 The Packaging Council would welcome the opportunity to make an oral submission.

## 2.0 General Comments

- 2.1 The Packaging Council supports the purpose of the Bill, being to reporting of the state of New Zealand's environment in an independent, fair and accurate manner.
- 2.2 We similarly support the emphasis for environmental reporting to be targeted to topics of "*significance, statistical rigour and (where there is) evidence of a strong connection to an environmental state.*" (Explanatory Note, page 2).
- 2.3 Packaging and packaging waste issues are potential political platforms<sup>1</sup> therefore we are particularly pleased to note that the stated intention is that reporting "*will be at arms length from the government*". Clause 14 imposes duty of the Secretary and the Government Statistician to act independently.
- 2.4 We are concerned by the potential interpretation of Clause 16 *Disclosure of Information*. As worded the Bill could be interpreted to constrain access to, and independent distribution of, the full spectrum of relevant information on any topic. The scope for 'direction' of the information considered relevant to any reporting period could be interpreted as a power to constrain informed debate, now or in the future.
- 2.5 The wording of Clause 16(1) suggests the power to withhold information could be very broad to the extent that '*information or analysis that will be, or has been used....*' could apply to almost any information.
- 2.6 The Packaging Council has historically worked with the Ministry for the Environment to provide industry expertise on packaging and packaging waste issues to assist in developing policy documents such as the New Zealand Waste Strategy (see 1.4 above). The subjectivity and discretion provided for in the current draft suggests

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<sup>1</sup> The Green Party Waste Free New Zealand Policy Summary states:  
The Green party will shift tax from a focus on income and enterprise, to waste, pollution and natural resource use, for example taxes on packaging....

there is potential in future to ‘cherry pick’ information. Selective reporting is potentially detrimental to the packaging sector where the complexity and constraints associated with packaging and packaging waste require a broader input of information, often from very diverse sources, to fully understand particular issues.

### **3.0 CONCLUSIONS**

- 3.1 The Packaging Council supports the stated purpose of the Bill and in particular the requirement for rigorous and statistically robust analysis of New Zealand’s serious environmental issues.
- 3.2 The Packaging Council would like to see the roles for the Minister for the Environment and the Minister of Statistics under Clause 12 and Clause 18 reviewed to better guarantee that the reporting is truly “*at arms length from the government*”.