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By email: plastics.consultation@mfe.govt.nz

Submission: Reducing the impact of plastic on our environment

Introduction

Packaging New Zealand's role is to represent the interests of industry in public policy on packaging issues. Our members have a primary responsibility and commercial imperative to manufacture 'fit for purpose' packaging. This includes reducing the environmental impact of packaging through cost effective innovation including extended product stewardship where that is appropriate.

Packaging New Zealand represents the whole packaging supply chain, from raw material suppliers, packaging manufacturers and brand owners through to retailers and recycling operators.

The New Zealand packaging industry contributes \$4,338m to New Zealand's GDP supporting circa 5900 businesses and employing over 50,000 people, it also underpins a further \$32b of New Zealand's annual export revenue.

Consultation questions

- 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?**

In part only. The document is unbalanced addressing only the 'bad'.

Whilst it is clear that plastic pollution is a very real, significant global issue we contend that the consultation has used flawed thinking to justify a set of outcomes which are potentially either unfit or unrealistic in the context of NZ Inc. For example "*overuse and reliance on single-use plastic is causing (emphasis added) pollution*" which is simply incorrect. The legitimate need for efficacious packaging and products together with a lack of systems to manage end-of-life is the cause of pollution.

We believe the narrow focus of this consultation will achieve only limited success in reducing the impact of plastic on our environment. The missed opportunity is taking a broader, holistic approach for greater societal outcomes for NZ Inc. For example, plastic material operates in a complex eco-system. Simply removing the material does not address the need for the packaging or product. Instigating a ban on one material or product will simply lead to these being swapped out for another. This potentially introduces unintended consequences, such as introduction of



another waste stream, with all the consequent issues. It will also have little to no impact at all on the 'single-use' issue. This has been evident with the plastic bag ban which may have indeed eliminated the thin supermarket-type bags but there has been a consequent increase in bags with much greater plastic content (i.e. outside of the banned micron range) and proliferation of 're-useable' bags which ultimately are all destined for landfill.

A more sophisticated, systemic, 'whole-of-economy' perspective is required.

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

We suggest that you have listed a limited set of 'outcomes' not 'objectives'.

Packaging New Zealand suggests that the objective should be "*enduring consumer behavioural change leading to a cultural shift in consumption practices*".

Put simply, removing material from the system will indeed see a reduction in the amount in circulation. However, a simple ban will not nurture enduring consumer behaviour change, it will just encourage one material to be swapped for another.

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

In part only.

In and of themselves each option we would regard as simplistic in the context of the pre-determined set out outcomes. A well-considered combination is more likely to succeed in driving holistic NZ Inc. meaningful change. Further, we suggest that any options considered need to include mechanisms for engagement at a broad level to avoid competing interests where these might occur.

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?

No in the context of our answer to **Question 2**.

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?

No.

See answer to **Question 3**.

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?

In part.

We agree that it is necessary to provide a timeline to give certainty to business. However, we would contend that a targeted approach is more likely to be successful. This would accommodate the specific impact on affected local products and businesses. It would also accommodate wider trade implications, in particular where exporters have to meet global requirements, which may or may not align with NZ policy direction. Given the importance of NZ's exports this factor cannot be understated in terms of impact. This approach could also include more ambitious timeframes where appropriate and recognise realistic timeframes for items where NZ has little to no control.

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?

See answer to **Question 6**.



- 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.**

See answer to **Question 6**.

- 9. What would be the likely costs or benefits of phasing out all PVC and polystyrene packaging (hard polystyrene and EPS) by 2025?**

See answer to **Question 6** in the context of the potential impact on the wider Covid-constrained economy.

- 10. Do you believe there are practical alternatives to replace hard-to-recycle packaging (PVC, polystyrene and EPS)? If not, why?**

In the context of our answer to **Questions 2, 6 & 9** any issues would be clearly identified and a targeted solution could be developed appropriately.

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

Yes.

- 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.**

N/A

- 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.**

Segregating the impact on ‘affected parties’, as opposed to taking a more integrated, holistic view of benefits, perpetuates a fragmented regime rather than encouraging the design of solutions which provide an overall societal benefit – a process which inherently recognises, and deals with, trade-offs for all stakeholders.

- 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 costs and benefits are far more nuanced than this document suggests. We see the ultimate aim being a cultural shift in consumer behaviour – this list of costs and benefits does not capture this.

- 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?**

An integrated, systemic plan needs to be established to deliver on goals and targets. This needs to be bigger than the small sub-set of ‘hard-to-recycle’-plastics. The current system of ad-hoc pieces of work does not give business the confidence to invest. Nor does it provide consumers with a clear understanding how their behaviours contribute towards a circular future, including the impact on their households in terms of products, services and costs.

- 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.**

See our answer to **Question 15**.

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



We reiterate that this consultation is missing the opportunity to take an integrated, holistic approach to material challenges in the broad context of NZ Inc. – not just hard-to-recycle-plastics. See also our answer to **Question 15**.

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.

See our answer to **Question 6**.

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.

See our answers to **Questions 3, 13 & 15**.

We would also note that any policy should take care not to create an operating environment which stifles genuine innovation.

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?

See our answer to **Question 6**.

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.

See our answer to **Question 15**.

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

In the context of our answer to **Question 15** a fully integrated plan would include goals and targets – these measure progress and success.

Sharon Humphreys
Executive Director