

# Submission

Reducing the impact of plastic on our environment – moving away from hard-to-recycle and single-use items

November 2020

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# Reducing the impact of plastic on our environment – moving away from hard-to-recycle and single-use items

**By: Waipa District Council Submission**

**Deadline: 4 November 2020**

## ***Introduction***

Waipa District Council (Council) welcomes the opportunity to provide comment on the Ministry for the Environment’s consultation document titled ‘Reducing the impact of plastic on our environment – moving away from hard-to-recycle and single-use items’.

Our Council is active in the waste minimisation space with a full programme of engagement, education and opportunities for our residents, businesses and community groups. Waipa District Council appreciates the relationship with the Ministry and the waste levy funding that allows this work to occur on the ground, in our communities.

We provide a recycling service to over 21,000 homes, both urban and rural across our district. That includes a 140L wheelie bin for glass that is collected monthly and a 240L bin for co-mingled mixed recycling (plastics #1,2 & 5, tins, cans, paper and cardboard) that is collected every two weeks.

The information below was shared with elected members and discussed at the Service Delivery Committee meeting on Tuesday 15 September, where it was resolved to support the submission.

Please contact me if you wish to clarify or discuss any aspect of our submission.

Nga mihi na - warm wishes,  
Sally Fraser

***Sally Fraser*** Waste Minimisation Officer **WAIPA DISTRICT COUNCIL**  
[sally.fraser@waipadc.govt.nz](mailto:sally.fraser@waipadc.govt.nz) | [www.waipadc.govt.nz](http://www.waipadc.govt.nz)  
Ph: 07 8720030 | Ext. 7599 | MOBILE: 027 7029 855 | FAX: 07 872 0033

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### Question 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?**

The Council agrees that lightweight plastics that escape from the waste management service can go end up in an environment far from source. We are conscious of our large rivers being a possible conduit for plastics that our residents have purchased, used and disposed of, ending up in the sea.

Our recycling contractor works hard to access markets. Having more onshore opportunities would be beneficial to our contract costs and be beneficial to our ratepayers.

Like all Councils, Waipa District Council and our contractor have felt the effects of changing export markets. We anticipate that the Basel Convention for Transboundary Movements of Hazardous Waste will only make exporting lower grade plastics harder. In June 2020 the decision was made to stop collecting plastics #3,4,6 and 7 and inform our community that viable markets for these products were no longer available. Waipa District Council has been educating our community on how to identify these plastics and which products are commonly packaged in these plastics, as well as how to avoid using them (behaviour change project). The Waipa Waste Minimisation Officer initiated preparation of a recent video series showing people easy tips for avoiding plastics 3,4, 6 and 7 that was funded by, and co-delivered with, WasteMINZ.

References to examples on our website educating about the change to plastics we can recycle, and videos are here:

<https://www.waipadc.govt.nz/our-services/rubbish-and-recycling/recycling/know-your-plastics>  
<https://www.waipadc.govt.nz/our-services/rubbish-and-recycling/recycling/plastics-1-2-5-faqs>

The recent WasteMINZ audit of rubbish and recycling showed that there are more plastics with no plastic type number on them at all (8.3% in rubbish and recycling by weight) than hard to recycle plastics 3 and 6 combined (2.7% in rubbish and recycling by weight). This shows that the manufacturing, food and beverage and importing industries have further work to do on clearly marking all plastic products so that the community and the resource recover sector can readily identify which items can and can't be recycled.

Furthermore simply leaving the decision on which plastics to use up to the market to decide, has contributed to the current problem of un-wanted plastics in the environment, as manufacturers are not responsible for the end of life disposal of their products. The issue of disposal mostly falls to local councils as does the associated costs. In addition to the phasing out of plastics #3 and #6 we would encourage the Government to look closely at #4 and #7 in the future and at compulsory labelling (plastic number, clear directions on what to do with it, e.g. remove sleeve, and the size of any labelling to allow readability by most in our community).

We agree oxo-degradable products need to be included in the phase out. Micro-plastics are a growing environmental health concern for both terrestrial and aquatic environments. They are difficult to remediate due to their minute size once broken down in the environment. It is important to prevent more oxo-degradable products being unintendedly created during this proposed phase out.

### Question 2

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

Yes, the main objective supports the Council's work in recycling our ratepayers' recycling materials. The secondary objectives will also help contractors at the Recycling Materials Recovery Facility to sort faster as they will not be needing to identify PVC from PET. Removing PVC will minimise contamination in our PET bales.

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the Council time and money that can be better used working on dirtier recycling contamination (fabric, soft plastics, rubbish etc) and waste reduction messaging.

**Question 3**

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

Yes, the Council agrees that looking at what is occurring overseas and what is currently working best is a good place to start and the options outlined cover a broad range of economic, policy, voluntary and target led triggers for change.

**Question 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?**

We the Council agrees with the identified criteria and weighting.

**Question 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?**

Yes, the Council agrees that the mandatory phase-out delivers the most certainty on the elimination (or significant reduction) in the use of PVC and polystyrene packaging, oxo-degradable plastics, and single-use item from the supermarket shelves and our recycling system.

**Question 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?**

The sooner the better would suit the Council, but do appreciate the complexities of the manufacturing and distribution process. We suggest further work by the Ministry with the manufacturing and food and beverage industries to understand their re-tooling and product testing timelines needed to ensure that they can comply with these time frames. It was suggested in a recent WasteMINZ webinar with Plastics NZ and Square 1 that it is valuable to test product shelf life in real time, for example, one year, rather than try to accelerate it artificially. That type of food safety testing is important but does add time. Plus, allowing time for the change-over and using up of existing stocks of bulk purchase items, for example sushi trays held by individual shops. Perhaps an import and manufacture ban could come into effect earlier and allowing a further 12 Months to use up existing stocks is a way to handle this.

**Question 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?**

Yes, the Council supports the identification of PVC items and the polystyrene items and the two stage phase out. The Council believes further work with producers and transporters of cool products is needed when considering expanded polystyrene bins.

We agree a clear differentiation between single use PVC and long use items needs to be clear. PVC piping and guttering is not an issue; that is a valuable item with a long life.

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**Question 8**

**Do you think we should include all PVC and hard polystyrene packaging in stage 2 of the phase-out (e.g., not just food and beverage and EPS packaging)? Please explain your answer.**

The Council would like the Ministry to consider including display packaging which makes up a large part of PVC packaging and often included in recycling creating unwitting contamination. For example, toy display boxes, toothbrush and smoke detector packaging.

**Question 9**

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

The Council does not have the background knowledge to comment on this matter.

**Question 10**

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

The Council agrees that consideration to food shelf life is important. It is well-known that New Zealanders waste a lot of food, and with that food waste all the associated packaging and the embedded resources used in growing and getting the food to market. Balancing those wasted resources with finding viable packaging alternatives is important.

The Council believes that the issue with expanded polystyrene packaging is that disposal problem is left with the consumer. Despite the EPS industry saying they are working hard to collect it back, without an easily accessible way to get this waste back to the producers, the EPS packaging waste problem is left with the individual consumer households across New Zealand. If the industry was able to develop a system where the same courier/supplier company that delivers a product with EPS packaging (whiteware, TV etc) is also able to take the delivery box, packaging and old item away (if needed) that could be worth an exemption, especially if the box and packaging were reused. Consumers are likely to accept seeing a somewhat less perfect hard polystyrene casing and know that the product inside is still new.

With the right timeframes indicated and support for R&D for replacements, many environmentally suitable solutions are possible. The main issue with the ongoing use of EPS is that it so cheap to make that manufacturers not currently costing in the end of life disposal of the products, do not face sufficient incentives or requirements to work towards acceptable alternative. The Council believes the proposed phase out is key to kick start the innovative search and move to acceptable alternatives.

There are a number of global manufacturers that have already successfully moved away from the use of any non-recyclable plastic packaging for white ware and electronic products and have a whole of life product perspective to provide other manufacturers with environmentally good practice alternatives to follow.

**Question 11**

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

The Council agrees to the mandatory phase out of all oxo-degradable plastics. We cannot, however, comment on

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the time frame as the list of all products has not been formed, and the work with those stakeholders to understand the time needed for businesses to adjust has not been done.

**Question 12**

**If you manufacture, import or sell oxo-degradable plastics, which items would a phaseout affect? Are there practical alternatives for these items? Please provide details.**

Not applicable to the Council.

**Question 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.**

The Council can only comment on the assessment of costs and benefits of a mandatory phase-out of the targeted plastics to the Council. One benefit would be simpler messaging. If these products are no longer coming through our recycling system, the Council will not have to try to educate householders as to which products can and can't be recycled and what to do with them. The Ministry's stated benefit of "cost saving from diverting materials from landfill" is negligible, as the volumes of these plastics already so low currently. With plastics being light, they are not a costly contamination stream for us. The anticipated benefit is rather the improved efficiency for the recycling centres sorting process as there will be less items to remove.

In regard to the seven smaller plastic items, it is likely that there would be some decrease in litter cost implications. It would also simplify the Council's recycling communication messaging by not needing to specifically mention that households can't recycle plastic straws etc.

**Question 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.**

Please refer to the answer for Question 13 regarding simplification on recycling messaging. Further to this, if the Ministry adopts the standardisation of recycling items based on the recommendations of the Ministry commissioned WasteMINZ report it recently released. The recommended standardisation would allow for a national level promotion of simple recycling messages and free local councils to focus on other communication rather than constantly reminding people of what can and can't be recycled locally. In Waipa we have a lot of people moving from other regions and districts with different waste recycling regimes. Consequently we get a lot of items that can be recycled in other areas but which aren't in Waipa. For example, liquid paperboard (cartons). A lot of Councils are already familiar with most of the standardised items and it would be good if the Ministry could stipulate a standard. A nationally applicable standard would compel the small changes needed for country-wide consistency regarding recycling items and lead to less unnecessary contamination of recyclable waste and simpler messaging using national platforms (e.g. TV and radio).

**Question 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?**

The Council believes that simply providing guidance regarding the wish to move away from hard-to-recycle plastic packaging and leaving the market to resolve the environmental issues is not satisfactory. The global environmental problems associated with disposed plastic waste are such that the Council considers it imperative that there is national level regulation and standardisation in the use of hard-to-recycle plastics in packaging.

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Perhaps product stewardship legislation could help to at least financially incentivise the best choices? Furthermore, it is suggested that there is mandatory national labelling to make it clear that some items are “Not recyclable – this is rubbish”.

**Question 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.**

The Council totally supports providing for exemptions to allow access to plastic straws for disabled persons and for medical purposes.

It would be excellent if national level communication was done on the best alternative option if these are to be phased out. For example, really challenging the need for a straw/stirrer at all. There are still lots of resources used to create bamboo/cardboard straws and wooden single use stirrers and they will become single use waste items. It is only recently that people have been using these items. A policy change would create the chance to change how New Zealanders think about items they “need”. Anything that can move people away from wanting things they do not need, should be pursued and have some resource assigned to it to make it happen. This stance aligns with the waste hierarchy and supports overall sustainability, not just waste minimisation.

Options for produce bags: The Council would not like to see synthetic fabrics excluded from the options here. Synthetic fabrics create very strong, durable and light weight bags and they are less expensive than the natural fibres mentioned. We think having options that are not cost prohibitive is key in getting the support of all of our community. If one reusable produce bag costs more than the fruit they plan to put into it, that could restrict some people making the change in a timely manner. Getting a full life cycle assessment done on all these options would be useful, before the public promotion of alternatives so people will know if they buy a hemp bag they will have to use it X times before its overall life impact is less than a single use plastic produce bag.

**Question 17**

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

Yes, the Council believes the definitions make sense.

**Question 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.**

The Council suggests further consultation with manufactures and those who rely on these items to inform this question.

**Question 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.**

Coffee cups:

The Council would challenge the notion that “Plastic-free, single-use alternatives are not widely available” in regards to coffee cups? We consider that reusable on the go cups are widely available and quite reasonable in price. It is considered that the issue is driven by a behaviour of supply and convenience that could be changed.

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There is the option of taking a mug from home or work for your take-out or drinking in. If it were a case where everyone knew there was no takeaway coffee cups available at all in New Zealand, they would easily be able to change their expectations and use a reusable vessel for their drink.

Recent research from WasteMINZ showed that many New Zealanders think (and are very confident in their knowledge) that coffee cups can be recycled. This is partially because the industry creating the cups has confusing labelling, for example, promoting and printing on the cup the 3-triangle symbol and that the cup is made from recycled material confuses some consumers that it can be recycled also. None are actively labelling “This needs to be landfilled” or “this can’t be recycled”. It’s imperative these companies and cafes are clear about the end destination for their products. Many lids are compostable, but only if sent to one of the very few commercial composting facilities in New Zealand. This just does not happen in most cases. In our experience, the more compostable plastic lids that are made, (particularly with poor labelling), the more end up in our recycling collections. Most people do not understand the 3-triangle symbol and associated number is a plastic type label only, most people think it means it can be recycled.

The Council wonders if there is an opportunity in this consultation or in your Product Stewardship to compel this change? We wonder if a set fee for all takeaway cup use could possibly be considered? Not just relying on leaders in the industry to step out from their competitors (and risk market share) by using the negative incentive of charging for a disposable coffee cup over and above the reusable or drink in rate. It is suggested that this lever has been shown to be more effective in leading behaviour change than giving a discount to those bringing in a reusable cup.

The disposable coffee cup is acknowledged to be a large issue and any national level solution would need to be well researched. Including disposable coffee cups in this phase out with a longer time frame would ensure that work was done and that is our Council’s recommendation.

In regard to alternatives, the Council supports actions that sit towards the top of the waste hierarchy (e.g. reuse). We support the roll out of a cup-lending programme nationwide. This provision allows ease for the consumer on the go (cups provided, deposit is cheap, can return dirty cups). To be successful and provide the maximum benefit it needs to be the same system country wide, that allows no risk on when the purchaser can redeem their deposit or which café they can use their cup in.

Regarding the cardboard cup alternative: This alternative would create a future recycling contamination issue as the cup would be dirty, and people are already often trying to recycle coffee cups now. If this were to be pursued the labelling would need to be very clear “This is rubbish”.

Regarding collection of compostable cups: This options is not our preference. If this option is considered further by the Ministry, the Council strongly suggests that it should be clear that the cost for this collection should sit with the manufacturer not the consumer householder. If a company chooses to put these products onto the market then it should accept the responsibility for the collection and end of life commercial composting. Even so it should be noted that this option has no guarantee that coffee cups do not remain a common recycling contaminant.

Wipes:

Waipa District Council supports mandating that labels include a clear and obvious ‘do not flush’ message, and information to highlight that the wipes contain plastic with a short lead in time for this change.

Equally support the other ideas outlined:

- public education campaigns to encourage reduction in use and appropriate disposal



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- product (NB compulsory product stewardship would be most effective) stewardship approach – for example; in Europe producers will have to cover the cost of waste management, data gathering, and education and awareness associated with wet wipes from 31 December 2024.
  - working with industry on a voluntary agreement to shift away from plastic as an ingredient in wet wipes.

**Question 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?**

Not applicable to Council.

**Question 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?**

The Council does not have enough information to make an informed recommendation.



**TE AWAMUTU - HEAD OFFICE**

101 Bank Street, Private Bag 2402, Te Awamutu Ph 07 872 0030

**CAMBRIDGE - SERVICE CENTRE**

23 Wilson Street, Cambridge Ph 07 823 3800

[f](#) /WaipāDistrictCouncil   [@](#) /Waipā\_NZ   [t](#) /Waipā\_DC