

# **Ministry for the Environment**

## **Proposed priority products and priority product stewardship scheme guidelines**

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## Submitter details

1. Nelson Marlborough Health (Nelson Marlborough District Health Board) (NMH) is a key organisation involved in the health and wellbeing of the people within Te Tau Ihu. NMH appreciates the opportunity to comment from a public health perspective on the Ministry for the Environment's Hazardous substances assessments: Improving decision making.
2. NMH makes this submission in recognition of its responsibilities to improve, promote and protect the health of people and communities under the New Zealand Public Health and Disability Act 2000 and the Health Act 1956.
3. This submission sets out particular matters of interest and concern to NMH.

## Specific Comments

4. NMH supports the adoption of a product stewardship schemes where business take responsibility for the life-cycle impacts of their products. This is the direction that many countries have adopted and will lead to the reduction of environmental harm posed by certain end-of-life products.

### *Tyres*

5. NMH supports the inclusion of end-of life tyres as a priority product. Stockpiling and dumping of tyres raises the risk of fire, discharge of contaminants into soil or water, the creation of breeding grounds for mosquito or rodent populations that may spread disease. The majority of New Zealand's tyres are put into landfills whereas many countries such as Australia, Canada and 21 EU countries have regulated product stewardship schemes<sup>1,2</sup>.
6. NMH notes that during tyre recycling processes, the textile component of tyres can create a build-up of dust and fibre in machinery and the atmosphere which can have subsequent health issues for operators<sup>3</sup>. This will need to be managed accordingly as part of tyre recycling.
7. NMH is disappointed to see that no action has occurred on the National Environmental Standard (NES) for the Outdoor Storage of Tyres which was

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<sup>1</sup> <https://www.tyrewise.co.nz/the-project/international-schemes/>

<sup>2</sup> European Tyre & Rubber Manufacturer's Association (2015) *End-of-life Tyre REPORT 2015* <http://www.etrma.org/uploads/Modules/Documentsmanager/elt-report-v9a---final.pdf>

<sup>3</sup> Ibid

consulted on in August 2017. Submitters at that time, including NMH, all identified that it was necessary to have a NES due to the environmental, financial, legal and health risks associated with outdoor tyre stockpiles<sup>4</sup>.

#### *Electrical and electronic products*

8. NMH supports the inclusion of electrical and electronic products (2a,b,c). Many of these products contain materials such as rare metals that could be reused. E-waste contains toxic substances such as lead, cadmium and mercury which can leach and pollute the environment. Improving the collection, treatment and recycling of electronics at the end of their life is essential for improving environmental management and enhancing resource efficiency.<sup>5</sup>
9. NMH recommends that the guidelines include nonstandard proprietary batteries such as those commonly found in medical devices. The manufacturers of these products need to design devices which encourages reuse or recycling.

#### *Refrigerants and other synthetic greenhouse gases*

10. NMH supports the inclusion of refrigerants. Gases used as an anaesthetic (i.e. Desflurane or Sevoflurane) may be considered as greenhouse gases which when expelled in the atmosphere contribute to climate change.<sup>6</sup> NMH notes that these gases are not included within this proposal which is appropriate. There has been significant improvements in the control of environmental contamination by anaesthetic gases in recent years however anaesthesia providers and users should continue to be prudent by minimising unnecessary atmospheric pollution.<sup>7</sup>
11. NMH support the inclusion of methyl bromide. Methyl bromide is a known ozone-depleting substance, and under the Montreal Protocol New Zealand has an obligation to phase out its use, and where it is used to maximise its recapture during phase-out. In the Environmental Protection Authority's recent reassessment of methyl bromide, NMH has continued to advocate for an immediate phase out of the release of methyl bromide to the atmosphere. NMH advocates for urgent further work on other options, especially Ethanedinitrile (EDN) as a phytosanitary fumigant with the potential to greatly reduce methyl bromide use.

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<sup>4</sup> <https://www.mfe.govt.nz/sites/default/files/media/Climate%20Change/tyres-summary-of-submissions.pdf>

<sup>5</sup> [https://ec.europa.eu/environment/waste/weee/index\\_en.htm](https://ec.europa.eu/environment/waste/weee/index_en.htm)

<sup>6</sup> [https://www.thelancet.com/pdfs/journals/lanplh/PIIS2542-5196\(17\)30040-2.pdf](https://www.thelancet.com/pdfs/journals/lanplh/PIIS2542-5196(17)30040-2.pdf)

<sup>7</sup> Yasny, J. S., & White, J. (2012). *Environmental implications of anaesthetic gases*. *Anaesthesia progress*, 59(4), 154–158. doi:10.2344/0003-3006-59.4.154 <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3522493/>

### *Packaging*

12. NMH supports the inclusion of beverage packaging and single-use plastic consumer goods packaging.
13. NMH supports the broad definition of packaging but NMH advocates to the definition to be extended to include all packaging. For hygiene purposes, the health sector uses many products which are individually wrapped in plastic, plastic or foil. It would be useful to have mechanisms to dispose waste from these products appropriately.
14. In addition, all packaging needs to contain packaging material codes so consumers know how to best dispose of the product.
15. Subsequent to the release of this proposal, NMH was pleased to hear the Minister for the Environment announced that a beverage container return scheme is under investigation. NMH supports the introduction of such a schemes because it has been proven to increase recycling rates significantly and reduce land fill waste.<sup>8</sup>

### **Conclusion**

16. NMH thanks the Ministry for the Environment for the opportunity to comment on the Proposed Priority Products and Priority Product Stewardship scheme guidelines.
17. NMH **does not wish to be heard** in support of its submission.

Yours sincerely



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<sup>8</sup> <https://www.beehive.govt.nz/release/work-underway-beverage-container-return-scheme>