

# **Ministry for the Environment**

## **Reducing the impact of plastic on our environment**

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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 *Reducing waste: a more effective landfill levy*.
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

**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?*

NMH agrees with this description of the problems in relation to hard-to-recycle plastic packaging and single-use plastics items. Plastic is omnipresent in our daily lives, in particular plastic packaging is very difficult to avoid and difficult to recycle which causes a significant amount of plastic going into landfill. Recycling options are limited. The long term environmental and health effects of plastic pollution are only just being discovered now.<sup>1</sup>

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

NMH agrees that the objectives are sound from a resource recovery perspective. While health related impacts may not be relevant in this perspective, they are still significant if end-of-life plastic is not managed appropriately.

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

NMH agrees with the options but the mandatory phase out option could be more explicit (see Question 5).

**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?*

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<sup>1</sup> <https://www.who.int/news/item/22-08-2019-who-calls-for-more-research-into-microplastics-and-a-crackdown-on-plastic-pollution>

NMH agree with the criteria. NMH notes that there seem to be a calculation error on Table 3 where the *mandatory phase-out calculation* column does not seem to be correctly tallied (page 33).

**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?*

NMH strongly support the mandatory phase out option, however this option could be more explicit.

A sector-by-sector approach is recommended to fully understand the level of imported plastic and its use in New Zealand. For example, the healthcare sector relies heavily on imported equipment, clinical supplies, and pharmaceuticals. As this is already a competitive market, limiting access to products due to their plastic content and packaging could have serious implications on the ability to provide certain health services. It is important that sectors such as ours are supported as we transition away from hard to recycle materials. Product stewardship embedding localised solutions for packaging could be an interim solution.

These phase-out options should also be coupled with product stewardship schemes for some medical supplies. For example, expanded polystyrene boxes are used to transport medical supplies that must be kept refrigerated. Alternative reusable packaging may be significantly more expensive therefore a product stewardship scheme may be a more appropriate option. NMH notes that this scheme should be argued as an exception until a better cost effective alternative becomes available.

In addition, incentives could be given to enable people to reduce consumption and reuse materials wherever possible.

**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?*

NMH agrees with having a staged approach. NMH recommends that a very clear communications package is created so that all manufacturers clearly understand how to identify the plastic types and the alternatives available.



**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?*

NMH agrees.

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

Environmental degradation caused by plastic waste is not solely due to food and beverage packaging. All forms of consumer product packaging containing hard-to-recycle plastics should be included in this ban (e.g. as clamshell product packaging, plastic shrink wrapping, etc., made of PVC or polystyrene). To not include all product packaging seems to unfairly target the food and beverage industry, while leaving other consumer good industries free to continue to use products that may cause detrimental impacts. This may require a longer lead time, particularly on imported goods.

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

NMH agree that there are practical alternatives available to replace hard-to-recycle packaging, however it must be acknowledged that New Zealand does not currently have the required infrastructure to recycle 4 and 5 plastics in the volume that they are created. Investment in additional recycling infrastructure is necessary to really see any benefits otherwise these plastic types could also be considered "hard-to-recycle".

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

NMH strongly support the mandatory phase out of oxo-degradable plastics. As identified by the Parliamentary Commission for the Environment<sup>2</sup> further research is needed on the effects of oxo-degradable plastics in the terrestrial ecosystem, and particularly high value soils used for the production of food. Oxo-degradable plastics may be a human health concern.

Improved messaging needs to be encouraged to ensure that there is clarity around what plastic materials (if any) are actually biodegradable or compostable. Any such claims need to be substantiated by reliable scientific evidence and meet

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<sup>2</sup> <https://www.pce.parliament.nz/media/196536/oxo-and-biodegradable-plastics-report-northcott-and-pantos.pdf>

specified standards to prevent misleading consumers about the environmental impacts of degradable plastic products.<sup>3</sup>

**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.*

NMH agree with this section. Consideration could also be given to including the benefits to human health that would occur if all plastic waste generated in New Zealand is collected and recycled.

In addition, the costs and benefits of providing more recycling infrastructure in New Zealand and in our local communities in relation to water/air pollution, job creation are not covered in detail here.

**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?*

NMH supports reusable and refillable alternatives where they are available and appropriate. At times, NMH uses single-use materials such as cutlery and drinking vessels. Currently in New Zealand, there are cost barriers to using compostable solutions (i.e. cardboard, wood, bamboo) at scale as these are currently twice the price of plastic options. There is a lack of decentralised commercial composting infrastructure so NMH is unable to divert compostable items from landfill at this time.

NMH would like to see more investment in decentralised commercial composting infrastructure as this would reduce carbon and environmental footprint, alongside providing additional nutrients to local soil.

**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.*

NMH would like to see single use coffee cups, wet wipes, and toys in fast food added to this list.

Single-use coffee cups and lids can cause contamination in hospital recycling bins. Reusable coffee cup systems are already available in New Zealand. Further,

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<sup>3</sup> [http://www.leginfo.ca.gov/pub/11-12/bill/sen/sb\\_0551-0600/sb\\_567\\_bill\\_20111008\\_chaptered.pdf](http://www.leginfo.ca.gov/pub/11-12/bill/sen/sb_0551-0600/sb_567_bill_20111008_chaptered.pdf)



unless there is significant investment in commercial composting systems, having commercially compostable only single use products (such as PLA lined coffee cups) the only products available on the market does not alter landfill volumes.

Wet wipes can easily be replaced with cloth alternatives. NMH does use wipes in the healthcare environment, these should be potentially be treated similarly to straws where they are only available for medical use.

NMH recommends that New Zealand take the same approach as France and ban plastic toys in fast food. There are environmental and health benefits by doing so. The first being less plastic in the environment, the second is reducing the appeal of fast food. Offering toys with food products drives children's food preferences. Free movie character toys are powerful tools used by fast food chains to attract children. Children are particularly susceptible to this type of influence which leads them to request energy dense, nutrient poor food.<sup>4</sup> In 2019, Burger King announced that it would stop giving away plastic toys with children's meals in Britain.<sup>5</sup> NMH recommends that that plastic toys in fast foods is included.

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

The proposed definitions seem appropriate, however plastic tableware may require further clarity to ensure that single-use tableware is not relabelled as reusable.

**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.*

While a short time frame would be preferable from a zero waste perspective, a two - three year phase out should allow organisations enough time to organise procurement of replacement options, and allow the market to introduce more suppliers of sustainable options reducing the financial cost.

NMH recommends that all items have the same timeframe for ease of phase out and communication.

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<sup>4</sup> <https://www.opc.org.au/media/media-releases/free-toys-powerful-influence-on-what-kids-eat.html>

<sup>5</sup> [https://www.nny360.com/news/the-era-of-fast-food-toys-begins-to-melt-away/article\\_6044d845-9b4a-5bd2-99d9-fe48ed0f9adc.html](https://www.nny360.com/news/the-era-of-fast-food-toys-begins-to-melt-away/article_6044d845-9b4a-5bd2-99d9-fe48ed0f9adc.html)

**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.*

NMH strongly recommends that single use coffee cups, wet wipes, and toys in fast food are included. As discussed in the consultation documentation, innovations already exist for coffee cups and plastic based wet wipes. Enforcing a ban on a two - three year timeline will encourage more innovation and behaviour change. For example, if there is already a supplier providing a 100% paper coffee cup alternative, setting a ban timeline will allow other innovators to join the movement to reduce the significant landfill footprint single-use coffee cups create.

Further, wet wipes are a significant disruption to waste water systems, including in a hospital environment.

**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?*

Access to reliable plastic-free products and access to decentralised commercial composting infrastructure would enable the health care system to better transition away from plastic based materials.

**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?*

NMH recommends that all items have the same two-three year timeframe for ease of phase out and communication.

**Question 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.*

Expansion of the benefits to human health could have been added to the document.

NMH notes that the consultation document does not look at the effects of potential changes on those on low-incomes. Those on lower incomes may not be able to afford higher upfront costs of reusable options. Therefore further consideration needs to be given to the proposal which will alleviate any burden on those with low-incomes.

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

NMH recommends that the Ministry for the Environment work with local government to create compliance monitoring schedule and allocate appropriate funding.

### **Conclusion**

4. NMH thanks the Ministry for the Environment for the opportunity to comment on *Reducing the impact of plastic on our environment.*

Yours sincerely

A handwritten signature in blue ink, consisting of a large loop followed by a horizontal line and a small flourish at the end.

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