

Waiheke Local Board informal feedback on the Proposed priority products and priority product stewardship scheme guidelines

This is stage one of the Ministry for the Environment's process which consults on the proposed declaration of six priority products and on the ministerial guidelines to clarify expected outcomes and attributes of accredited priority product schemes.

Stage two will consult progressively by product group through 2019–2021 on proposed WMA regulations.

The Waiheke Local Board has as an objective in its 2017 Local Board Plan to reduce the waste stream by supporting initiatives that effectively minimise, reduce and recycle waste (Waiheke Local Board Plan 2017, p 25).

Consequently, the Waiheke Local Board supports the proposed priority products and scheme guidelines and wishes to provide the following feedback:

Selection of priority products

The board supports the priority products selected below but questions the apparent lack of an evidence-base used in the selection process. A successful product stewardship scheme needs to target those products which do greatest environmental damage. There is no evidence presented to enable stakeholders to judge which of the major product groups would benefit the environment most from an effective product stewardship scheme.

On Waiheke approximately 80% of the materials going to landfill are construction materials. These products should be considered for the scheme.

Priority products

Do you agree with the proposed scope for priority product declarations for the following six product groups?

Q1: End-of-life tyres

- (a) All pneumatic (air-filled) tyres and certain solid tyres for use on motorised vehicles (for cars, trucks, buses, motorcycles, all-terrain vehicles, tractors, forklifts, aircraft and off-road vehicles).
- (b) All pneumatic and solid tyres for use on bicycles (manual or motorised) and non-motorised equipment.

Agree, but rubber inner tubes should also be in scope.

Q2: Electrical and electronic products

- (a) Large rechargeable batteries designed for use in electric vehicles, household-scale and industrial renewable energy power systems, including but not limited to lithium-ion batteries.
- (b) All other batteries (eg, batteries designed for use in hand-held tools and devices).
- (c) All categories of waste electrical and electronic equipment (WEEE) defined in Annex II of European Directive 2012/19/EU (eg, 'anything that requires a plug or a battery to operate').

Agree. The scope of this product should include the chargers and accessories which are delivered with electronic products. Thought should be given to interchangeability of these accessories between models as devices are upgraded.

Q3: Agricultural chemicals and their containers

Chemicals in plastic containers up to and including 1000 litres in size that are used for:

- (a) any horticulture, agricultural and livestock production, including veterinary medicines
- (b) industrial, utility, infrastructure and recreational pest and weed control
- (c) forestry
- (d) household pest and weed control operations
- (e) similar activities conducted by or contracted by local and central government authorities.

This includes but is not limited to all substances that require registration under the Agricultural Compounds and Veterinary Medicines Act 1997, whether current or expired, and their containers (packaging), which are deemed hazardous until such time as triple-rinsed. Packaging for veterinary medicines, which includes syringes, tubes and flexible bags, must be phased in under the accredited scheme.

Agree

Q4: Refrigerants and other synthetic greenhouse gases

- (a) Refrigerants: all gases used for heating, cooling and air conditioning that are ozone-depleting substances under the Ozone Layer Protection Act 1996 and/or synthetic greenhouse gases under the Climate Change Response Act 2002, and products containing these gases.
- (b) Methyl bromide and products containing this gas.

Agree

Q5: Packaging

- (a) Beverage packaging: used to hold any beverage for retail sale that has more than 50 millilitres and less than 4 litres of capacity, made of any material singly or in combination with other materials (eg, plastic, glass, metal, paperboard or mixed laminated materials).
- (b) Single-use plastic consumer goods packaging: used for consumer goods at retail or wholesale level made of plastic resin codes 1, 2, 3, 4, 5, 6 or 7, singly or in combination with one or more of these plastics or any non-plastic material, and not designed to be refilled.

Agree

Q6: Farm plastics

- (a) Plastic wrapping materials used for silage or hay, including but not limited to baleage wrap, hay bale netting, baling twine, and covers for silage pits.
- (b) Plastic packaging used for agricultural and horticultural commodities including but not limited to fertiliser sacks, feed sacks, and bulk tonne bags made from woven polypropylene and/or polyethylene.
- (c) Other plastic packaging and products used for agriculture and horticulture including, but not limited to, protective nets, reflective ground covers, and rigid plastic containers other than containers for agrichemicals, detergents, lubricants or solvents.

Agree

Ministerial guidelines for priority product stewardship schemes

Q7: Proposed guidelines

Do you agree with the proposed guidelines for priority product stewardship schemes outlined in table 3?

Agree

Q8: Changes to guidelines

What changes would you make to the proposed guidelines for priority product stewardship schemes?

The board has comments on the following selected points in the proposed ministerial process:

1. Intended objectives and outcomes

- It is critical that the products selected for the scheme will make the most significant and quantifiable impact on the natural environment when reduced or removed.
- There should be a category for construction waste including building wrapping, plastics and solvents.
- Include a category for roading materials, including toxic substances.
- Support the concept of product management higher up the waste hierarchy. The board recommends that the scheme incentivises innovation to reduce the need for, or amount of, packaging.

2. Fees, funding and cost effectiveness

- The impact of more than one accredited scheme should be considered, not just in terms of the net cost effectiveness to the producers (monetary and non-monetary costs and benefits) but also the net benefit to the natural environment as primary driver.

3. Governance

- The board supports the independence of the governance function and suggests that representatives of environmental organisations familiar with the priority products in the waste stream, are members of the governance group.

4. Stakeholder engagement and collaboration

- It is also critical that end users of the products are engaged in the process, as their behaviour will have a major bearing on the success of the schemes.

5. Compliance

- Effective published methods are needed to ensure compliance including significant fines and prosecutions.

6. Targets

- No comment

7. Timeframes

- As soon as possible since all things that cannot be reused end up in landfill.

8. Market Development

- No comments

9. Performance standards, training and certification

- No comment

10. Liability and Insurance

- No comment

11. Design for Environment

- No comment

12. Reporting and Public Accountability

- No comment

13. Public Awareness

- No comment

14. Monitoring compliance and enforcement

- No comment

15. Accessible collection networks

- No comment

General Comments

- Emphasis should be placed on the development of longer lasting higher quality products which are not disposed of so readily.
- The board supports cash-back schemes for bottles and plastics which would encourage re-use and recycling and effectively divert waste from landfill. Cash-back schemes should be extending to as many different products as possible.
- Need to consider the effect on the environment of engineered recycled products. Unless these products are high quality, durable and able to be recycled, they may have even worse effects on the environment in the future.
- Wish to see product stewardship within the second-hand car market, around disposing and repurposing.
- There needs to be effective deterrents to producing obsolete products which have no recycling value, e.g. Fonterra's opaque lined bottles.

Waiheke Local Board

30 August 2019