



4 December 2020

Via email: [Plastics.Consultation@mfe.govt.nz](mailto:Plastics.Consultation@mfe.govt.nz)

Dear Sir / Madam,

**SUBMISSION: REDUCING THE IMPACT OF PLASTIC ON OUR ENVIRONMENT**

Thank you for the opportunity to present our feedback on the Ministry's consultation document: Reducing the impact of plastic on our environment.

Queenstown Lakes District Council (QLDC) is broadly supportive of the proposed measures to reduce the prevalence of single use and hard-to-recycle plastics in the environment. As the following submission shows, QLDC believes there are further measures that could be taken by the Ministry to focus on the root cause of too much plastic being created as well as the mandatory phase-outs being tabled. The proposals detailed in the consultation document however, have the potential benefits of improving the health of ecosystems, water and air quality, and human health.

Thank you again for the opportunity to comment and should the opportunity arise, officers may wish to speak to this submission. It should be noted that this submission is the position of officers and has not been ratified by full council.

Yours faithfully,



Mike Theelen  
**Chief Executive**

## Submission on the phase out of hard-to-recycle and single-use plastics.

### **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?**

Yes – in part.

While the consultation document does comprehensively describe the issues associated with hard-to-recycle plastics packaging and single-use plastic items, broadening the scope to include the wider cultural, economic and regulatory systems, which drive or enable consumption of these and other plastic materials would prove useful when determining regulatory responses.

As identified within the consultation document, plastic waste and the build-up of plastic in the environment is one of the greatest challenges of modern life. However, to date, too much emphasis has been placed on poor or unsustainable management of plastic waste being the primary cause of plastic pollution (and the associated impacts). To effectively address the plastic crisis there needs to be more focus on the root cause of too much plastic being created due to a global and national dependence on single-use and plastic packaging, and the public misconception around the ease of recovering plastics through recycling.

There also needs to be more emphasis placed on the following aspects:

- The low price of virgin plastic and a lack of regulation requiring the use of recycled resin that are both barriers to keeping “easy-to-recycle” plastics in a closed loop system to enable a reduction on dependence on virgin plastic use and therefore reduce the impacts associated with the production of virgin plastic.
- Product design, such as the use of coloured plastics, non-recyclable labels, tear off tamper wraps, multipack composite products, unclear labelling of a product’s recyclability etc. which can limit a product’s recyclability regardless of it being a “high quality/easy-to-recycle” plastic type.
- Limited access to expensive automated Materials Recovery Facility technology that is required to distinguish between plastics types to ensure the quality specs from onshore reprocessors can be met can present a barrier to recovering “easy-to-recycle” plastic types.
- The significant negative human health externalities related to the production and consumption of plastic materials both locally and globally.
- The climate change impacts associated with all aspects of the plastic lifecycle including the manufacture, distribution and disposal of single-use and plastic items.
- The need for specific regulation and investment to disincentivise single-use across all material types to avoid perverse outcomes from a ban of this nature and instead incentive and drive a reuse culture.

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

Yes – in part.

The main objective should be amended as follows:

Reduce the impact on the resource recovery system, the natural environment and human health from hard-to-recycle plastic packaging and single-use items through significantly reducing the amount in use and accelerating the transition to a circular economy.

The below should also be added as secondary objectives:

- enable an effective after-use plastics economy to capture more material value and increase resource productivity, so that there can be a shift away from a reliance on virgin resin towards recycled resin to close the loop in the plastics economy and reduce the amount of new plastics entering New Zealand.
- reuse models are applied wherever practicable, reducing the need for single-use packaging.
- reduce carbon emissions associated with the manufacture, distribution and disposal of single-use and plastic packaging items.
- protect human health from the negative effects of plastic.

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

Yes – in part.

The proposed options could be blended to support a long-lasting and effective move away from reliance on all single-use items and to avoid unintended outcomes from a ban. Council recommend an approach that combines the proposed bans with regulated product stewardship, levies/fees, labelling, measurable targets, deposit-return, take back schemes, and community engagement. When feasible, QLDC also support requiring mandatory minimum levels of recycled content in products where safe to ensure that all 'easy-to-recycle' plastics permitted after the proposed bans are effectively captured and recycled in a closed loop system. This will enable a reduced dependence on virgin feedstocks and create a demand-pull for recycled plastics, sending a clear signal stimulating investments in the collection, sorting, and recycling industry.

In addition to the options listed, there would be support for the consideration of additional measures to support the uptake and scale of reuse, e.g.

- mandatory targets for reuse/refill on specified items
- mandating reusables in dine-in settings (as done through phase 3 of the Berkley Single Use Food ware and Litter Reduction Ordinance)
- levies on targeted single-use items of all materials (e.g. coffee cups) that could be diverted into waste minimisation
- guidelines for the durability, repairability or modularity of products.

The Government could also consider the further option of applying fees to cover estimated costs for clean-up and disposal of items not proposed for a ban, but which are still problematic, such as cigarette butts, takeaway packaging and wet wipes. These types of fees to cover clean-up and disposal costs differ from a levy and should be possible under s 23(1)(d) of the WMA.

**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.

More weight should be given to how well each option aligns with strategic direction. This would ensure that the highest-ranking outcomes are higher up the waste hierarchy e.g. reduction and reuse solutions. The alignment of strategic direction should also include legislation such as the Zero Carbon Act.

**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 – in part.

Mandatory phase-outs are a clear, simple way of eliminating harmful plastics. QLDC supports mandatory phase-outs of all the items listed (with the exception of plastic straws for those groups of the community which require them) but acknowledge that a 'ban only' approach can sometimes lead to perverse outcomes like the swapping of one single-use material for another. A ban alone also does not fix the problem of reliance on virgin plastic resin. Even if there is a shift to only using 'easy-to-recycle' plastics, this does not ensure that those products will be recycled or recycled back into the same kind of product. Positive regulatory and policy options are required alongside a ban to support reuse alternatives and increase recycled content in products when practicable under the WMA framework.

This blended approach would result in less waste, a lasting shift in social norms and behaviour change, and stronger markets for recycled resin. QLDC supports the Government moving ahead with reduction targets for any plastic packaging items that are not banned, which would require transparency from producers and importers (such as supermarkets and retail chains, food chains, manufacturers and exporters) about the volume of plastic used in order to measure plastic reduction over time.

There is also support for clearer labelling of product recyclability and a thorough education campaign on products not included in the proposed ban to reduce consumer confusion and enable more product to be recycled or disposed of correctly.

**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?**

Yes – in part.

QLDC agrees with the proposed phase-out of PVC and polystyrene packaging in two stages given that some items are easier to phase-out than others.

For some products the timeframes for phase-out should be shorter, products such as EPS foamed cups, containers (e.g., clamshell takeaway containers) and meat trays, some rigid PS items like lidded sauce cups and sushi trays, and all PVC trays where viable alternatives exist. PVC trays are especially problematic for the recycling industry as they are the main contaminants of onshore clear PET recycling, and are easily substituted by clear PET trays. This is particularly relevant in the Queentown Lakes district where there is currently no access to optical sorting technology within the Materials Recovery Facility which limits the ability to recycle all clear PET product via the onshore reprocessor, Flight Plastics.

There may be unintended consequences of a ban on PVC/PS/EPS packaging resulting in their replacement with packaging materials as bad, or worse, in terms of environmental effects. There is a need to ensure that the viable packaging alternatives are fit for purpose and align with the strategic objective of the proposal. However, decisive action to reduce plastics from the economy should be taken to counteract the negative externalities associated with the manufacture, distribution and disposal of single-use and plastic packaging items.

**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?**

No - While this is a comprehensive list of products, the phase out of PVC packaging should apply to all consumer facing packaging not just food and beverage (i.e. packaging used for hardware goods etc.).

**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.**

Where applicable all PVC and rigid PS should be phased out however, where these materials are used for packaging for medications and to ensure food products are kept at suitable temperatures for long distance transportation, exemptions may be required if suitable alternatives are not available.

PVC is also used extensively in other industries, such as construction and roading, for a variety of products. Council recommends that more research be undertaken to determine whether there are suitable replacements for these products.

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

Benefits:

- Whether used for food and beverage packaging, or other types of packaging, PVC is a contaminant in the recycling stream. This is especially relevant in the Queenstown Lakes district where there is not currently the required optical sorting technology to distinguish between PET and PVC in the Materials Recovery Facility. This limits the types of PET products able to be recycled. Phasing it out for all packaging applications will assist in the ongoing drive to provide high quality recycling materials to onshore reprocessors.
- EPS, which becomes litter in the environment, creates lasting damage to the soil, waterways and marine environment. Phasing out EPS for all consumer packaging would therefore better protect ecosystems than limiting the phase-out to food and beverage packaging only.
- A small quantity of higher quality EPS is being collected for recycling - and is reprocessed either overseas or onshore into products like insulation. However, due to the harmful properties of plastic in the environment, QLDC would support it being replaced as a packaging material.
- Rigid/hard polystyrene (6) packaging cannot be recycled as there is no market for it. Phasing it out as a packaging material in all contexts would allow for its replacement with a recyclable material, or ideally a reusable packaging option, which would be a move towards a circular economy.

- Reduction in use of hard-to-recycle plastics, leading to less contamination at kerbside, and a reduction in hard-to-recycle plastics going to landfill. This will result in lower sorting and disposal costs and a greater rate of easy-to-recycle plastics being recovered.
- Cleaner, higher value recycling streams, assuming materials are swapped out for domestically recyclable plastics #1, #2 & #5.
- Increasing the viability of domestic recycling opportunities for #1, #2 & #5s due to higher volumes and increased quality.
- It would create a level playing field for all businesses which would provide certainty and fairness.

Costs:

- Industry will need to develop new processes and alter production lines to accommodate different packaging materials.
- Higher cost of alternative material types for packaging, especially for takeaway containers. While a significant percentage increase, this is a matter of cents per item. The cost is likely to be passed on to the consumer. Research by both WasteMINZ and Colmar Brunton has shown a willingness by consumers to pay higher prices for more sustainable packaging choices.
- Large quantities of unused PVC/PS/EPS packaging going to landfill once the ban takes effect. This could be mitigated by a well signaled and considered lead-in time and liaison with recyclers as clean EPS is recyclable.
- Inferior-quality packaging could result in increased food loss and waste.
- Potential for higher environmental costs depending on new packaging choices. A ban on PVC/PS/EPS could end up with these materials being replaced with something as bad or worse from an environmental/waste perspective e.g. a composite material whose only option is landfill, or a compostable plastic #7 which is unlikely to be home compostable and also unlikely to reach a commercial composting facility which is able to process it. There is a risk of creating yet another contaminant in kerbside recycling or in commercial composting processes, or at best the use of additional materials whose only option is landfill. Consideration needs to be given as to how to not only ban PVC/PS/EPS packaging but also ensure a simultaneous transition to materials that can be easily recycled onshore or preferably reusable packaging options.

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

Yes – in part.

While QLDC agrees with the list of examples of alternatives set out in Table 5, however, given the complexities involved in determining which plastics are used in food packaging, this is a very technical and specialised area and so is not a question that Territorial Authorities are necessarily best placed to answer.

Additional regulations and policy is required to support the scale and uptake of reusable alternatives, mandatory recycled content and sustainable product design where designing out waste is top priority. Sustainable product design, which considers the full lifecycle of a product/material including the end-of-life options, is necessary to prevent any unintended consequences from the

targeted phase-out. For example, banning EPS appliance packaging is likely to boost use of moulded cardboard packaging. Research should be done to identify the best practice end-of-life solution for moulded cardboard packaging (i.e. recycling or composting). The research should be widely disseminated to packaging suppliers and product designers so that appropriate choices of glue, coatings and/or colourings are made to align with the end-of-life solution. Clear labelling is also essential so that customers know what they should do with the packaging after use. Durable, reusable appliance packaging should also be explored.

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

Partially.

Degradable plastics of all types should be phased out. This includes both oxo-degradable and photo-degradable plastics. It is important when defining this ban to ensure that the definition can cover the wide range of existing degradable products and any future degradable products.

Degradable products cannot be recycled or composted and are a contaminant to both industries. As they are designed to break down more quickly into microplastics when littered, they are a greater source of environment harm than conventional plastic. A shorter phase out period for these plastics is recommended due to both the harm they cause and also the deceptive nature of the advertising for many of these products which imply that they are greener and more environmentally friendly than conventional plastic leading to confusion and frustration for consumers.

Due to the issues caused by these types of plastic and the often misleading nature of how some of these products are advertised, a shorter phase out period should be implemented, by January 2022.

**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.**

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.**

Yes – in part.

The consultation document sets out a comprehensive list of the costs and benefits to various sector groups of the mandatory phase-out of the targeted plastics. However, it may also be valuable to supplement the cost/benefit approach included in the document with a holistic lens.

The current cost/benefit approach perceives the ‘environment’ as an “affected party” separate to, and distinct from, human survival. Current and future generations - and indeed the economy - can only thrive within the planet’s limits to stay in balance. Taking action on plastics is an essential step towards preserving the functional ecosystems required to sustain life.

The phase-out of targeted plastics will have additional benefits for:

- Indigenous communities: reducing plastic pollution may reduce degradation of the natural (including marine) environment which has impacted on customary practices.
- Fresh water quality: microplastic contamination of drinking water is already occurring.
- Ecosystem health: microplastics are being found in all ecosystem compartments, including within organisms, so far examined. Their impacts range from the individual level to the ecosystem level.
- Air quality: microplastics are increasingly being found in the air of both populated and remote locations.
- Human health: The 2019 report *Plastic & Health: The Hidden Costs of a Plastic Planet* found that significant, complex, and intersecting human health impacts occur at every stage of the plastic lifecycle.
- Climate: Reducing single-use plastics will reduce the reliance on virgin plastic resin, and therefore on fossil fuels. Emissions from plastic emerge not only from the production and manufacture of plastic itself, but from every stage in the plastic lifecycle – from the extraction and transport of the fossil fuels that are the primary feedstocks for plastic, to refining and manufacturing, to waste management. Acting to reduce single-use plastics and increase recycled content will also help New Zealand meet its international and domestic climate change obligations.
- Future generations: Reducing targeted plastics helps to reduce degradation of ecosystems essential to the wellbeing of future generations and non-human species.

***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.***

One benefit currently missing is the opportunity for businesses and community enterprises to develop reuse schemes and reusable packaging systems to replace the targeted plastics. Preliminary studies indicate that reuse systems produce far more jobs than systems based on disposal or recycling. These increased jobs are also more likely to be localised and which could aid economic recovery for districts which have suffered due to COVID-19.

The growth of reuse schemes and shifting social norms will also lead to a reduction in other single-use packaging (not just targeted plastic), which will further reduce costs for local authorities and ratepayers.

As mentioned previously, the greatest risk is if a ban on PVC/PS/EPS ends up with these materials being replaced with something as bad or worse from an environmental perspective. Consideration needs to be given as to how to not only ban PVC/PS/EPS packaging, but also ensure the simultaneous transition to materials that can be easily captured and recycled in a closed loop system onshore in NZ, or preferably how reusables can replace single use. Other measures that could assist would be standardising kerbside recycling and introducing compulsory labelling which clearly indicates the recyclability and/or compostability of materials. In terms of compostable packaging, the Ministry for the Environment needs to assist industry to develop the appropriate processing and collection infrastructure, whether that be through funding or designating compostable packaging a priority product. Alternatively, it could be clearly signalled that compostable packaging is not an appropriate alternative to PVC and EPS.



**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 standardisation of materials collected at kerbside recycling collections would send a signal to manufacturers and producers about which packaging types are best to use for recyclability, and this in turn would help the public move away from hard-to-recycle packaging.

Government regulatory policy and investment is needed to move reusable alternatives from the niche to the mainstream. It is noted that it is already possible to 'BYO' reusable containers and tableware for takeaway food and drink. In many cases, washable crockery is a realistic alternative instead of disposables. A handful of reuse schemes exist for reusable takeaway packaging, such as Again Again, CupCycling and Reusabowl. The issue is not a lack of ideas or models, but barriers to scale and normalisation of these systems within an entrenched linear economy, and lack of adequate incentives to ensure uptake of reusable alternatives when they are available. Accordingly, sustained policy interventions and investment are required to level the playing field between single-use and reuse. A blended policy mix could include levies on single-use items and delivery systems (which will encourage uptake of reusable and refillable models), deposit return systems on food and beverage packaging, mandating reusable service ware in certain situations, and reuse quotas/targets.

Money should be made available for the infrastructure needed to make reuse work (e.g. reverse logistics and sterilisation), with a preference for locally-based infrastructure to reduce emissions and increase community engagement and job creation.

**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.**

QLDC is supportive of a ban of all the items proposed in Table 7. In addition to causing issues when littered, none of these items are accepted for kerbside recycling but they contribute to contamination in recycling.

There are concerns raised by disability groups on the proposed ban on plastic straws and while some reusable alternatives work well for some people, for others there may be no reusable alternative that is suitable.

It is not clear if plastic produce bags over 70 microns would be able to be used. No plastic produce bags would be the preference.

Would there be some criteria for what makes plastic tableware reusable? As a potential danger could be that people remarket their disposable plastic tableware (that doesn't last very long, is not designed for more than single use) as reusable.

The list could also be extended to include these other single-use plastic items:

- Single-use disposable coffee cups and their lids should also be included in the proposed phase-out list as the proposed timeframe for implementation could stretch as far as 2025. A single-use coffee cup ban can certainly be achieved within that timeframe as businesses and consumers will have plenty of preparatory time to transition to reusable alternatives.
- Plastic lollipop sticks and wrappers: These can easily be replaced by cardboard sticks and paper wrappers.

- Single-serve pottles, sachets & containers for condiments and toiletries: For example, soy sauce fish, pottles with peelable plastic lids for jam, butter and other condiments, sachets of sauces, condiments, sugar and toiletries. One of the items commonly picked up by volunteers cleaning up after the Fox River landfill disaster were single-use sachets from the accommodation and hospitality providers in this popular tourist destination. Some hotels are already voluntarily phasing out these single-serve items.
- Coffee pods containing plastic: Single-serve coffee pods made of any material are hard-to-recycle because each pod contains coffee grinds that must be removed before recycling is possible. A phase-out of all single-use coffee pods (reusable pods exist) is supported but for the purposes of this consultation only those containing plastic should be included in this mandatory phase-out list.
- Teabags containing plastic: Many teabags contain plastic (either in the bag itself or the adhesives that hold the bag together). This is not common knowledge and many people put used teabags in their compost bins. Consequently, teabags containing plastic present a similar concern for potential plastic contamination of soil as plastic fruit stickers do. The consultation document has earmarked fruit stickers for a ban; for consistency's sake, teabags containing plastic should be included on the list for mandatory phase-out too. Not all teabags contain plastic, so alternatives do exist. In addition to potential microplastic contamination of soils, plastic in teabags is also a health concern as the plastic and additives may be released into the tea.
- Single-use plastic water bottles: In New Zealand, there is widespread access to potable water from the tap, so bottling water in plastic and transporting it around the country, and the world, needlessly creates harmful emissions and waste. Single-use plastic bottles are an inefficient and environmentally harmful way to provide access to potable water, which could be replaced by public fountains or bulk, reusable containers. Initiatives like Refill NZ are gaining traction, but banning or at least imposing a tax on single-use plastic water bottles could make a real difference in the volume of plastic water bottles used and reinforce New Zealand's brand as one of high environmental standards. Exemptions could be designed for civil defence and emergency situations.
- Balloons and balloon sticks.
- Glitter and plastic confetti: Plastic-based glitter is used in a wide range of cosmetic products and art supplies. Environmentally friendly options exist on the market. As a microplastic, glitter shares similar environmental impacts to other microplastics.
- Complementary plastic toys on children's magazines and with fast food.
- Chewing gum containing plastic - most large branded chewing gum contains plastic and causes up to 100,000 tonnes of plastic pollution globally every year.

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

Yes – with changes.

QLDC strongly supports the proposal to include items made of degradable, oxo-degradable, biodegradable and compostable plastics in the proposed phase-out. As the consultation document notes, many of these products are not certified, and/or not home compostable nor freshwater/marine degradable.

The following alterations or clarifications of the proposed definitions are recommended:

- Single-use plastic tableware: alter the proposed definition to include paper bowls and containers with plastic or wax linings (similar to the plastic cups and lids definition).
- Single-use plastic produce bags: broaden the definition to include plastic net bags that fruit and vegetables are commonly pre-packed into within the scope of the phase-out.
- Single-use plastic cups and lids: QLDC does not support exempting single-use plastic cups made of plastics 1, 2 and 5 from a ban. Although these cups are technically recyclable, they are mostly used away from home, and are likely to enter the recycling system unwashed via public recycling bin systems. Any unwashed cups that contain milk products or smoothies are considered contaminated and will not meet quality standards for recycling. At best, these plastics will be pulled out from the recycling stream and discarded, at worst they can result in the entire contents of the bin going to landfill. Even if the cups are clean enough to meet quality standards (e.g. if they contained water or soft drinks), public recycling bins are often heavily contaminated, resulting in the contents of many going to landfill. These cups are also easily breakable and therefore hard to bale and transport for reprocessing. For this reason, defining recyclability not just by the type of plastic, but also by the likelihood of it being recycled given existing collection and processing systems is preferred. If the exemption goes ahead, QLDC recommends that lids not be included in the exemption as their size effectively makes them 'hard-to-recycle' items in most kerbside systems that rely on automated MRFs for sorting. Furthermore, they are detachable so can easily be lost to the environment. Excluding these products from a ban also allows for the continued use of single-use products at the likes of events and disincentives organisers from using reusable options.
- Single-use coffee cups and lids: There is support for disposable coffee cups being included in the proposed phase-out. WasteMINZ research has indicated that 44% of councils are in favour of a ban.

**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.**

Many businesses import these products in bulk and often have inventory sufficient for a number of years. However, the longer these items remain in circulation the more likely they are to be littered or to contaminate recycling. QLDC is supportive of a well-signalled phase out within 2 years of less.

**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.**

#### Single-use Coffee Cups

In New Zealand, coffee cups contaminate kerbside and public place recycling and in the case of compostable cups, New Zealand lacks both the collection infrastructure and sufficient composting facilities with the resource consent to accept them. As well as being a contaminant to the recycling stream, coffee cups are also light and prone to escaping into the environment. The fully detachable lids increase the potential for harmful plastic litter.

The expertise to create reusable infrastructure and accompanying community engagement is already well established in New Zealand. Virtually all outlets already accept BYO reusables, and most outlets have in-house ceramic options if people forget their cup. There is also a growing range of reuse schemes/cup loan systems.

Nationwide, a growing number of cafes have eliminated single-use cups entirely by implementing strategies to encourage customers to “sit, borrow or bring”. They have implemented a combination of incentives such as discounts/surcharges, retail of ‘keep cups’, adoption of homegrown/national reuse systems (e.g. Again Again and informal cup loans), invitations to BYO, education around the issue and importantly, encouragement to build community by making time to stay. An example of this includes the SUCFree campaign, which aims to make Wānaka single-use coffee cups free by 2022, with nine cafes already committed and more than 180,000 cups saved from landfill since the initiative started in 2019.

The most impactful role for the Government is to use regulation, policy & investment to increase the uptake, accessibility (including affordability), reach and availability of reusable alternatives to throwaway coffee cups. Effective policy options (many of which are possible under s 23 of the WMA or without the need for new Parliamentary legislation) include:

- Mandatory reusables for dine-in customers
- Supporting the creation of a ‘bring your own cup’ norm
- Well-publicised disposable cup-free zones (e.g. university campuses & Govt buildings, museums and galleries, coasts and national parks)
- A deposit return scheme for both disposable coffee cups and reusable alternatives offered through a reuse scheme (e.g. Again Again) plus mandating that all outlets dispensing takeaway cups (whether disposable or reusable) take back empty cups (for appropriate disposal or reuse) - achieved under s 23(1)(c) and (e) of the WMA.
- Ensuring that reusable cups & reuse schemes follow universal design principles and are accessible for everyone in the community.
- Investing in the infrastructure needed for reuse schemes to work well, e.g. reverse logistics & sterilisation services.
- Working with MoH and MPI to create official reusables guidelines so that businesses & the public can feel confident in the safety of reuse.
- Updating food safety legislation to require outlets to accept clean BYO cups.
- Compulsory labelling on disposable coffee cups that inform consumers about reusable alternatives and where they should be disposed of (i.e. in rubbish bins, unless a commercial collection facility is available for compostable cups)
- A levy on disposable coffee cups and/or producer fees under s 23(1)(d) to cover the estimated costs associated with disposal or clean-up.
- Inclusion of disposable coffee cups in the proposed mandatory phase-out list because this will stimulate solutions.

The Government suggests it could invest in scaling up reuse systems. This is supported by QLDC alongside regulatory and policy interventions that remove some of the barriers to reuse schemes growing. Doing both will be most effective & efficient. Rather than investing in expensive systems to downcycle or compost cups, it may be more efficient to invest this money in stimulating the scale and uptake of a reusables network. Local community engagement and collaborative solutions are more impactful in terms of creating lasting behaviour change than high-level national education.

Funding support to NGOs and community groups already working to educate and engage on the ground would be the most efficient way to invest in behaviour change.

#### Wet Wipes

Wet wipes are a significant issue for councils, who spend thousands of dollars undoing blockages in wastewater systems. 73% of councils would like to see wet wipes banned with only 26% of councils supportive of the decision not to ban them.

In alignment with the waste hierarchy, QLDC supports investment in community engagement around reusable alternatives. It is noted that building acceptance of reusable wipes as an alternative to wet wipes connects closely to the promotion of reusable nappies – trialling alternative approaches in the early childhood sector is the type of activity which could be considered. Developing a culture of reusable wipes may also provide a potential use for unwanted textiles, contributing to a circular solution.

In conjunction with promoting a reusable option, Council supports requirements and action which will help consumers make an informed choice. Wet wipes resemble tissues and lack any mandatory content disclosure, which is confusing to consumers. There should be a requirement for compulsory on product labelling to inform users of how to dispose of them correctly and to prohibit use of the word “flushable” on the product packaging for all wipe types (these labelling requirements should be mandated through regulation under s 23(1)(f) of the WMA).

Before a ban is brought in, QLDC would also support fees being attached to wet wipes to cover the clean-up costs (which can be considerable when they block pipes and form fatbergs).

An alternative pathway that could be helpful would be to declare disposable sanitary products (which would include wet wipes) as a ‘Priority Product’ - this would enable a considered, wraparound approach to a multitude of similar products at once.

***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?***

#### Coffee Cups

With formal Government support for reuse systems and community engagement, individual towns can meet their goal of being single-use cup (SUC) free by 2022. Replicating the successes of those towns could lead to a SUC free Aotearoa by 2023.

#### Wet Wipes

Industry may have to take an innovative approach to how these products are made, not only in terms of materials, but in terms of moving away from single-use items to reusable resources. A transition time of three years for a wet wipe ban is supported due to the issues these pose, in particular the blocking of wastewater pipes and the urgency with which these should be addressed. The aim is to encourage industry to take an innovative approach to better solutions for this product by suggesting a shorter transition time.

**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.**

Yes – in part.

QLDC agrees with the benefits listed, but notes the additional benefits below:

- It will support the strengthening of social norms for reuse and foster a culture of reuse and recycling, rather than disposing of single-use items.
- There could be the opportunity for new job creation or migration to circular local jobs.

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

It is important to monitor the level of compliance for target business sectors such as manufacturing, retail and hospitality sectors.

At its simplest form, this could be a hotline where members of the public can email if they see a business selling a non-compliant product.

Spot audits could also be undertaken in stores or businesses where compliance is likely to be more challenging.

Many councils, including QLDC, and businesses undertake waste audits, which could provide data to help understand compliance.

Setting targets with major brands, manufacturers and retailers and then requiring them to report on progress could help to determine progress and future initiatives.

It is also important to see if the legislation has achieved its desired aim. Included below are some suggestions as to how aims could be evaluated.

- Supermarket chains have completed inventories of the types of plastic packaging in their brands. Funding a repeat of these audits after the ban has been implemented would determine to what extent the amount of hard-to-recycle plastics had been reduced.
- Monitoring the amount and type of litter in the environment to see whether the rate at which these products have been littered has decreased.
- If Flight Plastic is able to accept PET trays from a larger number of councils, this would also be a clear indication that the legislation had achieved its aim to reducing contamination in recycling. Council waste audits would also provide evidence that contamination had decreased. The Rethinking Rubbish and Recycling Project has benchmarked contamination and use of plastics and this audit could be repeated once the ban is in place.
- Any evaluation could also include changes in public attitudes towards plastic products, packaging, litter and the general acceptance of these policies.