

Submitter Type:

Individual

Source:

Web Form

Overall Position:

Clause

1. Do you agree with the Government's proposal to prohibit the manufacture and sale of personal care products containing microbeads (eg, body scrubs, facial cleaners, toothpastes) to reduce their impacts on New Zealand's environment and human health? Why/why not?

Position

Yes

Notes

I agree with this proposal. I think that a non-regulatory option for minimising the use of microbeads in personal care products is unlikely to get results in a timely manner.

Clause

2. What are your views on the Government narrowing or widening the definition of the scope of personal care products containing microbeads to be prohibited from manufacture and sale in New Zealand?

Notes

I think the ban should be wide in order to cover all personal care products containing microbeads (unless, of course, the Department becomes aware of products that are vital to the health of consumers which have microbeads and no appropriate alternative exists.)

Clause

3. Do you currently manufacture, sell or use any personal care products containing microbeads? Please specify.

Position

No

Notes

Clause

4. Do you currently manufacture, sell or use any personal care products containing microbeads for medically prescribed uses or purposes? Please specify.

Position

No

Notes

Clause

5. Do you currently import any personal care products containing microbeads into New Zealand, either for sale or personal use? Please specify.

Position

No

Notes

Clause

7. Do you currently manufacture, sell or use any alternatives to personal care products containing microbeads (or components therein), which are designed and used for the same purpose(s)? Please specify.

Position

No

Notes

Clause

11. Do you support the Government's approach to administration and enforcement of the proposed regulations under the Waste Minimisation Act? Why/why not?

Position

Yes

Notes

Clause

13. What are your views on the Government's proposed timeframe for entry-into-force of the regulations under the Waste Minimisation Act to prohibit the manufacture and sale of personal care products containing microbeads?

Notes

In general, the proposal sounds sensible. I do not think it is necessary, or of particular benefit, to aim to align the implementation date with the timing of the United States' policy -- instead I think that the ban should be put in place as soon as is practicable. I think that,

given that there are limited products that the ban would likely effect, and that it is non-legislative change, that an implementation date should be specified in the first few months of 2018, rather than aiming for "sometime in 2018".

Clause

15. Are there any ways the Government could help industry or consumers transition away from personal care products containing microbeads ahead of the regulations' entry-into-force?

Notes

Making a decision as soon as possible and ensuring that communication of the decision-date is made to suppliers.

Clause

16. Do you have any further comments you wish to make about the Government's proposal?

Notes

From the discussion document, it is unclear whether a significant percentage of the microbeads used in New Zealand, that end up in waste water systems, are in personal care products. If it is unknown, I would hope that further work is done to ascertain the impact of microbeads in non-personal care products, and if it is high, whether there are options for imposing a similar ban on these. Also, thank you for the chance to make a submission - I was really pleased to see that this issue is being addressed.

The submitter have elected to withhold their personal details from publication.