

Overall Notes:

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

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 do not think narrowing the definition of micro beads would rectify the environmental impact they are having. Any definition of "microbeads" must include all solid plastic ingredients smaller than 5mm used for any purpose. There should be no lower size limit included in the definition. The legislation should cover all products that are washed down the drain. This includes a wide range of cosmetic and personal care products as well as cleaning products, make-up, and other product categories.

Clause

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

Position

No

Notes

I don't use microbeads because there are better, cheaper and natural alternatives in cleaning products and beauty products. The use of micro beads is not necessary and is only damaging.

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

6. Are you aware of any personal care products containing microbeads for any purpose that could be considered an essential or critical use?

Notes

Not that I am aware ~ and even if there were health products using micro-beads, alternative ingredients should be used. If the new legislation is not strict, more manufacturers would feel justified to use them which would be harder to regulate

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

8. Do you consider the alternatives to personal care products containing microbeads (or components therein) to be reasonably practicable, readily available, and similarly priced for existing personal, business or other uses? Why/why not?

Position

No

Notes**Clause**

9. Is there any reason why the alternatives would not be reasonably practicable, readily available, or similarly priced for personal, business or other uses? If so, would you consider operating against the policy intent and importing personal care products containing microbeads from overseas?

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**

12. Are there any other considerations for administration and enforcement of the proposed regulations that have not been outlined in the Administration and enforcement section in the Managing microbeads in personal care products consultation document?

Notes

Legislation should not allow so-called "biodegradable" plastics to be used as alternatives, as the conditions required for these materials to degrade in the marine environment are rarely met and they are thus not a solution to the problem; I also urge the Government to not allow for substitutions with materials of persistent, water-insoluble solid or wax-like nature that could cause similar harms to aquatic species. To lead with the most effective legislation against microbeads, the Government must ensure that all potential sources of microbeads are managed. This includes products that could be imported from overseas for personal use. Therefore, I urge the Government to prohibit the importation of the products in scope under section 3 of the Imports and Exports (Restrictions) Act 1988. I also encourage the Government to explore all options under the Trans-Tasman Mutual Recognition Act (i.e. exemptions for health, safety and environmental reasons) to restrict microbead products from entering New Zealand via Australia. Nearly a quarter of our cosmetic products enter our shops via Australia, and given the lack of a legislative ban on microbeads in Australia, there is no way to guarantee that these products do not contain microbeads.

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

There should be a clear and prompt timeline for phasing out these ingredients, and a date after which products containing microplastics must not be sold. This should be within two years of the ban.

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