

Cheryl Krull
Submitter Type:
Individual

Source: Web Form
Overall Position: Support

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

Most wastewater treatment technology is not capable of filtering out all microplastics, including microbeads. Once they're released into the marine environment, it is impossible to clean them up and they persist in the environment for hundreds of years, they enter the food chain and may have follow on effects for top predators (including human consumption of fish). Studies have also shown that some fish preferentially feed on microbeads rather than their natural food sources, leading to behavioural changes, starvation and poisoning.

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

The government should widen the scope to include any product (not just personal care) that will be 'rinsed off'. It is my worry that household cleaning products may start to contain microbeads and should also be included in the scope. There is some suggestion that certain dishwasher and laundry tablets contain microbeads, which must also be included in the scope.

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

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

Notes

No, there are many natural, biodegradable alternatives to microbeads.

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

Yes

Notes

This may also encourage the purchase of New Zealand made products (already on the market, containing no microbeads). As products containing microbeads are not currently manufactured in NZ.

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**

10. What would be the impact on you or your business if personal care products containing microbeads were prohibited for manufacture and sale in New Zealand and the alternatives were not reasonably practicable, readily available, or similarly priced?

Notes

NA

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

However, I am concerned that the enforcement of these restrictions would need to be strictly regulated and enforced from the outset. Ensuring that even small businesses are fined, to set the benchmark and ensure that the sale of these products does not continue.

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

It is my understanding that the regulations would not include individuals purchasing products online from overseas for their personal use. Is there any way to regulate this? Confiscate products entering NZ at customs that are known to 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

The government should implement these regulations as soon as practically possible.

Clause

14. Are there any issues about the proposed timeframe for entry-into-force of the regulations that the Government should consider?

Notes

The sooner the better.

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

Encourage industry to slowly phase out microbead products ahead of time and advertise the benefits of the replacement products on the shelf.

Clause

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

Notes

I fully support this proposal and applaud the Government for finally following the USA's example.

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