

Laura Stephen

Submitter Type: Individual

Source: Web Form

Overall Position: Support in

Part

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 strongly support the proposal for a legislative ban on microbeads in New Zealand, and urge the Government to introduce the ban as quickly as possible. I am aware that bans in other countries have fallen foul of loopholes or relied on ineffective, voluntary self-regulation. For this reason, I'm making a number of recommendations below that will help the New Zealand Government to avoid making these same mistakes. Breadth of products covered by the legislation I strongly agree with the intention to "define the scope of products as broadly as possible" and advocate for a comprehensive ban on personal care products containing microbeads. Specifically, I ask the Ministry to follow the below guidelines developed by Fauna & Flora International: - Any definition of "microbeads" must include all solid plastic ingredients smaller than 5mm used for any purpose (not just for exfoliation). 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; - Legislation should not allow so-called "biodegradable" plastics to be used as alternatives, as these materials do not degrade in the marine environment and therefore are not a solution to the problem; - 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. Lead with a legislative ban and avoid voluntary self-regulation I strongly support the consultation document's recommendation to introduce a legislative ban under the Waste Minimisation Act. Voluntary self-regulation by industry has proven ineffective in New Zealand to date. The organisation Plastic Diet exposed just a few months ago how companies who claimed to have largely phased out microbeads - such as Foodstuffs and Progressive - still had numerous microbead products for sale. For this reason, it is essential that the New Zealand Government introduce an outright legislative ban from 2018 at the latest. Products entering New Zealand via Australia I am concerned that the Trans-Tasman Mutual Recognition Act means that microbead products could still enter New Zealand via Australia, despite the ban. Given that nearly a quarter of our cosmetic products enter New Zealand via Australia, I would strongly encourage the Government to explore all options (i.e. exemptions allowed for health, safety and environmental reasons) to ensure that products containing microbeads do not enter New Zealand shops via Australia, until such a time that Australia introduce a comprehensive legislative ban. I strongly support the proposal for a legislative ban on microbeads in New Zealand. Yours sincerely, Laura Stephen

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! Like many other kiwis, I was not aware that many of the products had 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**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

It would be excellent for our environment and would make me very thankful that I and others couldn't accidentally purchase a product that was so blatantly damaging the environment. I would not bother at all if alternate products were marginally more expensive. In fact, it would be a great opportunity for kiwi companies to produce items which do not include microbeads.

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

Although I would increase the fines for breaching the law.

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

I would make it an offence import any product with microbeads as well as an offence to sell, use and own.

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

I advocate swift implementation of such law. As soon as practical, certainly within the year 2017.

Clause

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

Notes

The longer people unwittingly discharge unmanageable plastic pollutants into our water, the worse our marine environment becomes. I advocate prompt introduction of this ban to mitigate the damage already done to our environment.

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

Information - promotion of New Zealand made alternatives, promotion of large corporations who provide natural alternatives.

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