

## **Submission**

**To:** Microbeads consultation, Ministry for the Environment,  
PO Box 10362, Wellington 6143  
microbeads.submissions@mfe.govt.nz

**By:** Northland Regional Council

**On:** Managing microbeads in personal care products – Consultation Document

### **Introduction**

1. The Northland Regional Council (Council) thanks the Ministry for the opportunity to comment on the consultation document. This submission is made in the interests of providing a sustainable environment within New Zealand and Northland in particular.
2. Northland's freshwater and marine environments are highly valued and include unique and diverse ecological systems. These environments are also fundamental to Northland's social, economic and cultural well-being. Council is therefore supportive of measures to reduce the impacts of pollutants on these environments. Council also supports solutions that address pollutants at 'source' where this is practical.
3. While actual environmental and human health impacts of microbeads in New Zealand waters is largely unknown, New Zealand receives a great deal of value from its environmental credentials and its reputation for high quality food production, both of which are important for our economy. This value could well be compromised by a failure to intervene.
4. Therefore, Council considers a precautionary approach is warranted given:
  - The risks posed to the environment and human health are potentially significant
  - Impacts are effectively irreversible

- Use of microbeads is (for the most part) non-essential, and
  - There are likely to be viable benign alternatives available at similar cost.
5. A national intervention to address the issue 'at source' would be far more effective and efficient than local responses (E.g. attempting to impose 'end of pipe' controls under the Resource Management Act 1991 or through bylaws). Furthermore, this would ensure that there was a nationally consistent response to the issue. Council therefore supports the proposal to prohibit the manufacture and sale of personal care products containing microbeads by way of new regulations under the Waste Minimisation Act 2008. This would take advantage of existing legislation and enforcement mechanisms (as opposed to creating a new legal / regulatory regime) even if some additional resource were to be required.
  6. We also consider the EPA as a good option for administration, enforcement and monitoring of the regulations. Council does however recommend that should this approach proceed, that a complementary programme to raise public awareness of both the potential harm arising from use of microbeads and the new regulations be implemented to assist with compliance.
  7. Council understands there is some risk of 'unintended or perverse' consequences should the regulations effectively prohibit beneficial uses of microbeads (such as medicines). We therefore support a general prohibition with provision for exceptions on the grounds of essential or critical uses.
  8. In conclusion, Council supports the approach outlined in the discussion document (pending further work to identify the scope / range of products controlled). Council believes a failure to intervene has potential for far more detrimental environmental, human health and economic consequences (including reputational damage) than any cost associated with regulating manufacture and sale of microbeads.
  9. We also consider a national scale intervention 'at source' is the most effective and efficient means to address the micro-bead issue. We again thank the Ministry for the opportunity to comment and would appreciate a similar consultation round on draft regulations should the proposal proceed.

Signed on behalf of the Northland Regional Council by:

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Malcolm Nicolson

Chief Executive

A handwritten signature in blue ink, appearing to read 'Bill Shepherd', with a large, sweeping loop on the left side and a horizontal line extending to the right.

Bill Shepherd

Chairman

20 February 2017

