

Managing microbeads in personal care products

SUBMISSION FORM

The Government is seeking views on a proposed ban on the sale and manufacture of plastic microbeads in personal care products in New Zealand.

For more information about the Government's proposals read our [Managing microbeads in personal care products consultation document](#).

Submissions close at 5.00pm on Tuesday 28 February 2017.

Making a submission

You can provide feedback in three ways:

1. Use the online submission form available at www.mfe.govt.nz/consultation/proposal-ban-sale-and-manufacture-plastic-microbeads-personal-care-products-new-zealand. This is our preferred way to receive submissions.
2. Complete this submission form and send to us by email or post.
3. Write your own submission and send to us by email or post.

Publishing and releasing submissions

All or part of any written submission (including names of submitters) may be published on the Ministry for the Environment's website www.mfe.govt.nz. Unless you clearly specify otherwise in your submission, we will consider that you have consented to website posting of both your submission and your name.

Contents of submissions may be released to the public under the Official Information Act 1982 following requests to the Ministry for the Environment (including via email). Please advise if you have any objection to the release of any information contained in a submission and, in particular, which part(s) you consider should be withheld, together with the reason(s) for withholding the information. We will take into account all such objections when responding to requests for copies of, and information on, submissions to this consultation under the Official Information Act.

The Privacy Act 1993 applies certain principles about the collection, use and disclosure of information about individuals by various agencies, including the Ministry for the Environment. It governs access by individuals to information about themselves held by agencies. Any personal information you supply to the Ministry in the course of making a submission will be used by the Ministry only in relation to the matters covered by this consultation. Please clearly indicate in your submission if you do not wish your name to be included in any summary of submissions that the Ministry may publish.

Submission form

The questions below are a guide only and all comments are welcome. You do not have to answer all the questions. To ensure your point of view is clearly understood, please explain your rationale and provide supporting evidence where appropriate.

Contact information

Name*	Greg Nelson
Organisation (if applicable)	The Warehouse Group
Address	
Phone	
Email*	
Submitter type*	Individual <input type="checkbox"/> NGO <input type="checkbox"/> Business / Industry <input checked="" type="checkbox"/> Local government <input type="checkbox"/> Central government <input type="checkbox"/> Iwi <input type="checkbox"/> Other (please specify) <input type="checkbox"/>

* Questions marked with an asterisk are mandatory.

Products in scope

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?

- Yes
 No

While personal care products are the primary source of microbeads, it is important to understand their presence in other products that are washed off (into waterways). For example, Mr Muscle has several household cleaning products that include microbeads, including a toilet cleaner where the microbeads would enter waste water treatment systems.

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?

It should be widened, see response to Q1. Additionally, it should be widened to account for microplastics in general, not just beads, as the environmental impact is the same.

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

- Yes
 No

The Warehouse has had a voluntary ban on microplastics in place for several months, the target is for all personal care and household cleaning products to be microplastics free by 1 July 2018. We have already removed several microbead-containing products from sale, the remaining few will be replaced with microbead-free products before 1 July 2018.

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

- Yes
 No

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

- Yes
 No

See Q3 about our ban - we no longer import microbead-containing products. The few products remaining containing microbeads are sourced from a New Zealand-based supplier.

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

No

Available alternatives

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.

- Yes
 No

A range of alternatives are used from crushed Almond shells to oats.

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?

- Yes

No

Have not received any customer feedback on the alternatives to indicate any concerns.

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?

Yes

No

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?

Irrelevant as there are practical alternatives

Administration and enforcement

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

Yes

No

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 of this consultation document?

As highlighted in the consultation document, violations would most likely be by retailers. The onus is now placed on retailers to require greater transparency from their suppliers on what is in their products. Retailers need to be given support on what information to request from suppliers and how to assess it.

Timeframe

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?

While no concerns for The Warehouse as we have already started implementing a similar policy, though for some organisations may need additional time to identify the impacted products (see Q12), request alternatives from suppliers, and draw down stock of existing products.

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

See points in Q13.

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?

See Q12.

Other comments

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

Releasing submissions

Your submission may be released under the Official Information Act 1982 and may be published on the Ministry's website. Unless you clearly specify otherwise in your submission, we will consider that you have consented to website posting of both your submission and your name.

Please check this box if you would like your name, address, and any personal details withheld.

Note that the name, email, and submitter type fields are mandatory for you to make your submission.

When your submission is complete

If you are emailing your submission, send it to microbeads.submissions@mfe.govt.nz as a:

- PDF
- Microsoft Word document.

If you are posting your submission, send it to Microbeads consultation, Ministry for the Environment, PO Box 10362, Wellington 6143.

Submissions close at 5.00pm on Tuesday 28 February 2017.