

WasteMINZ TAO Forum: Submission on ban on single use plastic items and pvc and polystyrene food and beverage packaging 2020

About WasteMINZ

WasteMINZ is the largest representative body of the waste and resource recovery sector in New Zealand. Formed in 1989 it is a membership-based organisation with over 1,000 members – from small operators through to councils and large companies.

We seek to achieve ongoing and positive development of our industry through strengthening relationships, facilitating collaboration, knowledge sharing and championing the implementation of best practice standards.

WasteMINZ Territorial Authorities Officers Forum (TAO Forum)

The TAO Forum is a WasteMINZ sector group. The vision of the forum is to facilitate a clear and cohesive voice for the local government sector in relation to waste issues in order to influence and shape the future direction of the waste industry.

This is achieved by advocacy on behalf of the local government sector, leading strategic thinking on the future of the waste industry and encouraging information and knowledge sharing.

The TAO Forum is overseen by an elected Steering Committee consisting of the following council officers.

- Andre Erasmus Kawerau District Council
- Angela Atkins Hastings District Council
- Donna Peterson Invercargill City Council
- Eilidh Hilson Christchurch City Council
- Jennifer Elliot Wellington City Council
- Kimberley Hope New Plymouth District Council
- Kirsty Quickfall Hamilton City Council
- Parul Sood Auckland Council
- Sophie Mander Queenstown Lakes District Council

The steering committee is a representative mix of councils from throughout New Zealand, including small to large councils representing:

- North Island
- South Island
- City
- District
- Unitary

1. Do you agree with the description in this document of the problems with hard-to-recycle plastic packaging and single-use plastic items? If not, why?

The TAO Forum agrees with the description but think a broader framing of the problem would allow for wider issues to be considered and tackled, which will likely require more than a simple ban. Firstly, there is a culture of dependence (economic and social) on the convenience of single-use plastics. Secondly, we note the following issues which could be a barrier to the objectives outlined below:

- The price of virgin plastic can create an economic barrier to utilising recycled resin
- Product design, such as the use of coloured plastics, non-recyclable labels, tear off tamper wraps, multipack composite products and soft plastic pouches, can still limit a product's recyclability

The present proposal should be part of a comprehensive Government policy targeting reliance on both single-use products in general and on virgin plastic resin. This could include specific regulations and investment to disincentivise single-use and create a reuse culture.

Finally, overreliance on offshore markets increases our carbon footprint through importing fossil-fuelled plastic resin or manufactured plastic products. There is a need to develop zero or low-carbon alternatives where single-use is necessary and encourage onshore manufacture where possible.

2. Have we identified the correct objectives? If not, why?

Yes, however, we think there should be three main objectives

1. *Reduce the amount of hard-to-recycle plastic in use to enable a circular economy approach to material management and reflect the waste hierarchy.*
2. *Minimise the environmental impact of single-use items which are littered and make their way into our oceans and streams.*
3. *Reduce the current level of contamination in kerbside recycling*

The following list expands on the three main objectives rather than being secondary objectives.

- lower risk of environmental damage including through litter and poor resource management
- decreasing the risk of wildlife consuming plastic and plastic entering into our food chain
- less PVC contamination in our recycling stream, so high-value materials like PET can be recycled rather than sent to landfill
- fewer unrecyclable plastics in our recycling stream such as plastic cutlery plates etc leading to lower contamination

- less contamination of plastic in both home and commercial composting
- increasing the uptake of high-value packaging materials including PET (1), HDPE (2) and PP (5)
- improving the recyclability of plastic packaging
- reducing public confusion and making it easier for New Zealanders to recycle right
- reducing carbon emissions associated with the manufacture, distribution and disposal of single-use plastic items.

3. Do you agree that these are the correct options to consider? If not, why?

Yes, however, we believe these options could be blended to support a long-lasting and effective move away from reliance on all single-use items and to avoid unintended outcomes from a ban. We recommend an approach that combines the proposed bans with levies/fees, labelling, measurable targets, deposit-return, take back schemes, and community engagement. The EU Directive on Single-Use Plastics, and the plastics and packaging and single-use plastics chapters of the recently released Irish National Waste Policy, provide useful examples of blended approaches.

In addition to the options listed, we would support the consideration of additional measures to support the uptake and scale of reuse, e.g.

- mandatory targets for reuse/refill on specified items
- deposit return systems for takeaway service ware to ensure that they are in a recyclable condition (i.e., clean) and put in the correct recycling bins
- mandating reusables in dine-in settings (as done through phase 3 of the Berkley Single Use Food ware and Litter Reduction Ordinance)
- levies on targeted single-use items
- guidelines for the durability, repairability or modularity of products.

The Government could also consider the further option of applying fees to cover estimated costs for clean-up and disposal of items not proposed for a ban, but which are still problematic, such as cigarette butts, takeaway packaging and wet wipes. These types of fees to cover clean-up and disposal costs differ from a levy and should be possible under s 23(1)(d) of the WMA).

4. Have we identified the right criteria (including weightings) for evaluating options to shift away from PVC and polystyrene packaging, oxo-degradable plastics and some single-use items? If not, why?

No. The TAO Forum thinks that separate tables, weighting and criteria should be used to evaluate pvc and polystyrene; oxo-degradable plastics and single-use items as these product categories are distinct from each other and there are different issues with each of them.

There should be a criterion around technical feasibility. Currently, there isn't rpv or rpolystyrene on the market so mandatory recycled content is technically not feasible. Conversely, there are labelling schemes such as the Australasian Recycling Label, so the option of mandatory labelling requirements is technically feasible.

The TAO Forum also thinks that there should be criteria around willingness of the public to embrace the change and readiness of business – what shifts have businesses already made in this space?

Note with regards to the criteria, the alignment of strategic direction should also include legislation such as the Zero Carbon Act.

5. Do you agree with our assessment of the options, and our decision to take forward only one option (a mandatory phase-out)? If not, why?

Yes

6. Do you agree with the proposed phase-out of PVC and polystyrene packaging as set out in two stages (by 2023 and by 2025)? If not, why?

Whilst the TAO Forum is very supportive of moves to ban unrecyclable packaging, there is a need to carefully consider what the viable packaging alternatives are. A ban on PVC/PS/EPS packaging could result in their replacement with packaging materials as bad, or worse, in terms of environmental effects.

Firstly, both food safety and shelf life need to be considered. We need to balance the desire to reduce use of hard-to-recycle plastics with the potential for inferior packaging choices leading to increased food loss and waste, given that approximately one-third of all food produced for human consumption globally is already lost across the supply chain.

Secondly, we need to consider recyclability and how to ensure that measures to reduce PVC/PS/EPS packaging don't lead to an increase in packaging coded as plastic #7 or compostable packaging where there is no infrastructure in place to process it.

Finally, it is also important to have a carbon footprint lens to ensure, where possible, that alternatives use less resources in production, transport etc.

Therefore, the TAO Forum is supportive of a ban for products where known recyclable alternatives are available e.g. products which can be made out of plastics #1, #2 and #5. However, the TAO Forum notes that there is a risk that products could move from plastics #3 and #6 and switch instead to equally unrecyclable plastics.

The TAO Forum is supportive of a ban in two stages. Stage 1 should only include those products where there are known recyclable alternatives available. In particular, banning pvc and polystyrene trays would ensure that valuable PET trays, which are currently being landfilled, can be sent to processors such as Flight Plastics for recycling and could prevent some councils from needing to purchase costly optical sorters. EPS containers (eg, clamshell takeaway containers) and EPS and polystyrene cups cause contamination in kerbside recycling and once again there are suitable alternatives on the market.

The TAO Forum thinks that more research needs to be undertaken to ensure that the proposed 2025 timeframe for Stage 2 is sufficient to ensure recyclable alternatives to pvc and polystyrene.

7. Have we identified the right packaging items that would be covered by a phase-out of PVC and polystyrene packaging? If not, what would you include or leave out, and why?

A blanket ban may not necessarily be the most appropriate measure at this stage for PVC and PS rigid packaging. It may be better to focus on specific items within these packaging types where appropriate alternatives are readily available, particularly around supermarket food packaging and takeaway items that can easily be swapped out e.g. meat trays, sushi containers, and PS takeaway containers. This would place the focus on specific items that prevent the effective recycling of other recyclables e.g. pvc trays.

The TAO Forum notes that EPS packaging for homeware and whiteware can't be collected at kerbside due to its size, but can be collected through store takeback schemes. Plastic NZ has already begun work on voluntary product stewardship for pre-consumer eps packaging and several large retailers offer takeback schemes, but these aren't widely promoted.¹ Designating packaging for homeware and whiteware as a priority product and setting up a product stewardship scheme for this type of packaging to encourage industry-led innovation such as a redesign of packaging materials may also be a suitable option.

8. Do you think we should include all PVC and hard polystyrene packaging in stage 2 of the phase-out (e.g., not just food and beverage and EPS packaging)? Please explain your answer.

PVC and PS/EPS are used for packaging for medications and to ensure food products are kept at suitable temperatures for transportation. It is possible that exemptions might be needed for medical use if suitable alternatives are not available. PVC is also used in the construction industry for a variety of materials. The TAO Forum recommends that more research is undertaken to determine whether there are suitable replacements for these materials and to investigate where reusable or refillable options may be possible. The TAO Forum recommends that the next funding round of the Waste Minimisation Fund encourages applications to undertake this research.

9. What would be the likely costs or benefits of phasing out all PVC and polystyrene packaging (hard polystyrene and EPS) by 2025?

The TAO Forum believes that there would be the following benefits

Environmental

- There will be less plastic litter in the environment (streets, parks, streams, oceans) resulting in less harm to wildlife and fewer plastic particles within food chains.
- It will encourage the transition away from non-renewable oil-based products

Social

- There will be amenity improvements due to less litter in the environment.
- Reducing plastic waste in our environment contributes to improving the mauri of our environment.

¹ E.g. Harvey Norman

Economic

- Reduction in use of hard-to-recycle plastics, leading to less contamination at kerbside, and a reduction in hard-to-recycle plastics going to landfill. This will result in lower sorting and disposal costs.
- Cleaner, higher value recycling streams, assuming materials are swapped out for domestically recyclable plastics #1, #2 & #5.
- Increasing the viability of domestic recycling opportunities for #1, #2 & #5s due to higher volumes and increased quality.
- Businesses that produce products for export may gain a competitive advantage by using more recyclable packaging
- It would create a level playing field for all businesses which would provide certainty and fairness.
- With many of the alternatives being fibre or wood based, there may be an opportunity to produce more of these items on-shore in New Zealand using waste products from the timber industry.

The TAO Forum believes that there would be the following costs:

- Industry will need to develop new processes and alter production lines to accommodate different packaging materials.
- Higher cost of alternative material types for packaging, especially for takeaway containers. While a significant % increase, this is a matter of cents per item. The cost is likely to be passed on to the consumer. Research by both WasteMINZ² and Colmar Brunton³ has shown a willingness by consumers to pay higher prices for more sustainable packaging choices.
- Large quantities of unused PVC/PS/EPS packaging going to landfill once the ban takes effect. This could be mitigated by a long lead-in time and liaison with recyclers as clean EPS is recyclable .
- Inferior-quality packaging could result in increased food loss and waste.
- Potential for higher environmental costs depending on new packaging choices.

The TAO Forum believes that the last point noted above is the greatest risk. A ban on PVC/PS/EPS could end up with these materials being replaced with something as bad or worse from an environmental/waste perspective e.g. a composite material whose only option is landfill, or a compostable plastic #7 which is unlikely to be home compostable and also unlikely to reach a commercial composting facility which is able to process it. There is a risk of creating yet another contaminant in kerbside recycling or in commercial composting processes, or at best the use of additional materials whose only option is landfill. Consideration needs to be given as to how to not only ban PVC/PS/EPS packaging but also ensure a simultaneous transition to PET/ HDPE/ PP.

² WasteMINZ Plastic Bag Charges and Beverage Container Deposits Study 2016

³ https://static.colmarbrunton.co.nz/wp-content/uploads/2019/05/Colmar-Brunton_Better-Futures-2020-Presentation.pdf

10. Do you believe there are practical alternatives to replace hard-to-recycle packaging (PVC, polystyrene and EPS)? If not, why?

Given the complexities involved in determining which plastics are used in food packaging, ranging from ensuring plastics are food safe, to offering physical protection and providing adequate oxygen and moisture barriers where required, this is a very technical and specialised area and so is not a question that Territorial Authorities are necessarily best placed to answer.

Alternatives are already available for some food and beverage packaging items e.g. PET meat or biscuit trays where PET is proven to be effective as a packaging material, acceptable in kerbside recycling and with a domestic market for reprocessing (Flight Plastics).

There may not be practical replacements readily available for all PVC/PS/EPS food and drink packaging items, for example flexible PVC which is often used to package fresh pasta or ham, and PVC-related plastics which are used for barrier coatings.

Therefore, at this stage the TAO Forum believes that for the purposes of this consultation, in the short term, the scope must stay focused on single-use packaging where there are known viable alternatives and that further research and innovation may be needed for other packaging types

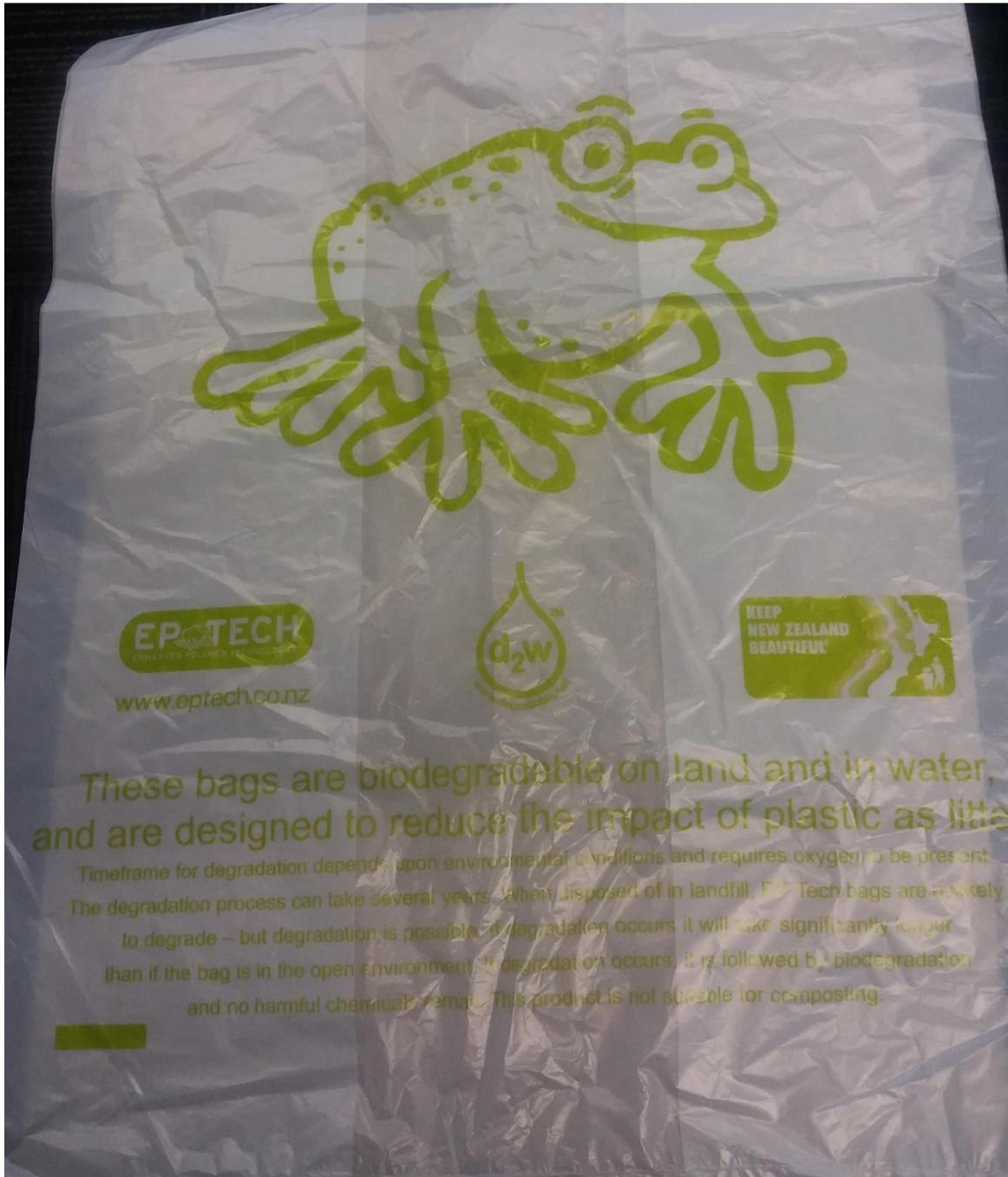
11. Do you agree with a mandatory phase-out of all oxo-degradable plastics by January 2023? If not, why?

Partially

Yes, degradable plastics of all types should be phased out. This includes both oxo-degradable and photo-degradable plastics. The TAO Forum notes that it is important when defining this ban to ensure that the definition can cover the wide range of existing degradable products and any future degradable products.

Degradable products cannot be recycled or composted and are a contaminant to both industries. As they are designed to break down more quickly into microplastics when littered, they are a greater source of environment harm than conventional plastic. A shorter phase out period for these plastics is recommended due to both the harm they cause and also the deceptive nature of the advertising for many of these products. Many of these products imply that they are greener and more environmentally friendly than conventional plastic, see image below.

Due to the issues caused by these types of plastic and the deceptive nature of how some of these products are advertised, the TAO Forum believes they should be phased out over a shorter time period by January 2022.



12. If you manufacture, import or sell oxo-degradable plastics, which items would a phase-out affect? Are there practical alternatives for these items? Please provide details.

n/a

13. Have we identified the right costs and benefits of a mandatory phase-out of the targeted plastics? If not, why not? Please provide evidence to support your answer.

Yes, the TAO Forum agrees that correct costs and benefits have been identified

14. How likely is it that phasing out the targeted plastics will have greater costs or benefits than those discussed here? Please provide details to explain your answer.

As mentioned previously, the greatest risk is if a ban on PVC/PS/EPS ends up with these materials being replaced with something as bad or worse from an environmental perspective. This would increase the costs but also reduce the benefits of the ban. Consideration needs to be given as to how to not only ban PVC/PS/EPS packaging, but ensure the simultaneous transition to PET/ HDPE/ PP. Other measures which could assist would be standardising kerbside recycling and introducing compulsory labelling for recyclability and compostability. In terms of compostable packaging, the Ministry for the Environment needs to assist industry to develop the appropriate processing and collection infrastructure, whether that be through funding or designating compostable packaging a priority product. Alternatively, it could be clearly signalled that compostable packaging is not an appropriate alternative to PVC and EPS. The TAO Forum prefers this option.

15. What would help to make it easier for you and your family, or your business/organisation to move away from hard-to-recycle plastic packaging and use higher value materials or reusable/refillable alternatives?

n/a

16. What do you think about the proposed mandatory phase-out of some single-use plastic items (see table 7)? Please specify any items you would leave out or add and explain why.

The TAO Forum is supportive of a ban of all the items proposed in Table 7. In addition to causing issues when littered, none of these items are accepted for kerbside recycling but they contribute to contamination in recycling. A 2019 national waste audit⁴ found that an estimated 851 tonnes of paper cups⁵ are disposed of in kerbside recycling comprising 1.3% of all contamination. Soft plastics, which would include plastic produce bags, makes up 3,754 tonnes of contamination - 5.7%. Plastic straws and plastic cutlery were found in the top 20 most common types of contamination by frequency.

These items also cause contamination for those councils who offer food and green waste collection services and there is strong support for the proposed ban on plastic fruit stickers.

The TAO Forum notes the concerns raised by disability groups on the proposed ban on plastic straws, but also notes that Auckland District Health Board has moved to providing paper straws only in their hospitals without incident.

17. Do the proposed definitions in table 7 make sense? If not, what would you change?

Whether a piece of cutlery or a drink cup is single-use or reusable isn't always clear cut. Microns were used as the differentiating measure for the plastic bag ban to distinguish between reusable or single-use bags. Single-use can be subjective, so further clarity is needed for the definitions of single-use plastic tableware and cutlery and single-use plastic cups and lids.

For clarity, we would encourage all the definitions to include the following description:

plastic including both degradable and biodegradable plastics.

⁴ Rethinking Rubbish and Recycling 2019 Sunshine Yates Consulting

⁵ Paper cups is defined as all cups made from fibre products, including single use soft drink cups, coffee cups, takeaway noodle bowls etc

18. What would be an appropriate phase-out period for single-use items? Please consider the impact of a shorter timeframe, versus a longer timeframe, and provide details where possible.

Plastics New Zealand has noted that many businesses import these products in bulk and often have inventory sufficient for a number of years. However, the longer these items remain in circulation the more likely they are to be littered or to contaminate recycling. Wellington City Council estimates the costs of dealing with contamination in recycling at c\$300,000 per annum. Therefore, the TAO Forum is supportive of a ban being implemented as early as possible to reduce the impact on the environment and the financial burden of councils whilst ensuring that the financial impact on businesses is mitigated. The TAO Forum is supportive of a well signalled phase out within two years or less.

19. What options could we consider for reducing the use of single-use coffee cups (with any type of plastic lining) and wet wipes that contain plastic? You may wish to consider some of the options discussed in this consultation document or suggest other options.

Only 56% of councils support the decision not to ban coffee cups at this stage with 44% of councils in favour of a ban.

The waste caused by New Zealand's coffee drinking culture and the associated costs are significant. The Rethinking Rubbish and Recycling research found that 1,288 tonnes of single-use cups are disposed of via councils' household kerbside rubbish collections with a further 851 tonnes contaminating household recycling bins. In addition, there would be a significant number that are disposed of via public place and commercial collection systems. 1.24 million coffee cups are used per annum in New Plymouth (as a conservative estimate), and it costs \$230,000 to dispose of these cups per annum. Therefore, the aim should be to move up the waste hierarchy, supporting systems that reduce the number of single-use cups used. This requires systematic change and incentives that establish a dominant culture of avoidance or reuse.

Reusable cups

If more people use reusable cups, there will be savings for businesses and less waste and therefore less burden on territorial authorities who bear the cost of a linear system. In alignment with the waste hierarchy, the focus should be on reuse rather than recycling or disposal for both waste and carbon reduction. In its simplest form, the best option to address coffee cups is through incentivising reusables.

We support investment into reuse systems such as cup-lending schemes, but recognise that this type of scheme acts primarily as a backup for the personal choice consumers make to bring their own cups. Therefore, supporting the creation of a 'bring your own cup' norm should be the main focus. There are also community-led approaches such as cup libraries which could be supported, for example by providing 'how-tos' and health and safety guidelines as an educational package to guide the hospitality sector. Behaviour change programmes using tools such as prompts, and commitments should be built into the support for wider use of reusable cups.

Single-use cups

In New Zealand coffee cups contaminate kerbside recycling and in the case of compostable cups, New Zealand lacks both the collection infrastructure and sufficient composting facilities with the

resource consent to accept them. We note that single-use cups are not considered in the upcoming mandatory product stewardship scheme for beverage containers, although they do meet the criteria in the potential scope. We suggest that inclusion in this scheme should also be investigated when identifying the most effective method to reduce/eliminate use of these items.

One way to stimulate reuse is through strategic use of taxation. A 2019 study showed that people are inclined to use a reusable coffee cup if they see other people doing this or if they are charged extra for a disposable cup. This aligns with the theory of loss aversion in which people experience the negative feeling of a loss more strongly than a positive sense of a gain, even if it's the same size. This means that cafes voluntarily giving a discount for a reusable cup is not as effective in changing behaviour as putting a levy on a disposable cup. To most effectively incentivise reuse, Ireland has committed to introducing a €0.25 tax on coffee cups in 2021 and the Californian city of Berkeley has already put a "latte levy" in place. This tax could potentially be used to fund the infrastructure required for single-use cups to be collected and composted.

The main barrier for composting facilities to be able to process compostable cups is the commercial requirement to produce organically certified compost. Products containing compostable plastics cannot be processed at these facilities.

For single-use cups to become part of the circular economy through composting, all cups on the market would need to be made from the same material as the cost involved in sorting compostable from non-compostable products would be prohibitive. The material used would need to be certified compostable and the cup would need to be fibre based with no plastic films or additives. Notwithstanding, this does not resolve the issue of resource consumption and carbon emissions.

Overall, the TAO Forum recommends that a suite of actions is needed to tackle the prevalence of single-use coffee cups.

- promoting reusable cups and cup loan schemes in the first instance
- investment to scale up re-use systems like Again and Again
- standardisation of any single-use cups available on the market (addressing composability and contamination issues)
- improved labelling requirements to make it clear whether a cup is compostable or not
- encouraging the development of well-publicised disposable cup-free zones (e.g. university campuses & government buildings, museums and galleries, coasts and national parks)
- a ban on coffee cups with plastic linings of any type; or in place of a ban, a levy on disposable coffee cups and/or producer fees under s 23(1)(d) to cover the estimated costs associated with disposal or clean-up.

Wet wipes

73% of councils would like to see wet wipes banned with only 26% of councils supportive of the decision not to ban them.

Wet wipes are a significant issue for TAs, who spend thousands of dollars undoing blockages in wastewater systems. For example, Gisborne District Council (GDC) estimate wet wipes are costing roughly \$100,000 per year due to complications they cause for the wastewater network's operation and maintenance costs. In addition to that, GDC estimate a spend of about \$43,500 p.a. for disposal costs at their wastewater treatment plant due to wet wipes, which would rise under the new waste

levy increases. South Taranaki District Council spends approximately \$20,000 annually unblocking pipes due to wet wipes.

The Watercare-operated Mangere Wastewater Treatment Plant screens out substantial volumes of single-use plastics and wet wipes on a daily basis. On average, the total single-use plastics component of the screenings are around 500 – 1600kg per day, or 350 – 600 tonnes per year. It is estimated that almost half of this quantity is wet wipes.

Wet wipes are another case of local government and thus rate payers footing the bill for industry's poor product design choices.

Reusable wipes

In alignment with the waste hierarchy, we see the best option being to promote reusable wipes as a simple return to squares of cloth. It is noted that building acceptance of reusable wipes as an alternative to wet wipes connects closely to the promotion of reusable nappies – trialling alternative approaches in the early childhood sector is the type of activity which could be considered. Developing a culture of reusable wipes may also provide a potential use for unwanted textiles, contributing to a circular solution.

It is important to recognise that time and access to the washing facilities required for reusable wipes may present a barrier for some. Considering the reasons why consumers choose to flush these products should also be part of any programme, for example disposable wipes may be flushed even when consumers are aware of the problem, because they are reluctant to place smelly used wipes in the rubbish.

Single-use regulation and action

In conjunction with promoting a reusable option, we support requirements and action which will help consumers make an informed choice. Wet wipes resemble tissues and lack any mandatory content disclosure, which is confusing to consumers. We call for a requirement to state the content in wipes so that the consumer is aware they contain plastic.

Ideally, industry would be required to transition away from plastic-based wipes through a mandatory phase out. This should also include products that are currently touted as biodegradable as they do not break down in a timely enough manner. This would avoid blockages and contribute to minimising plastic pollution of waterways and marine environments. We support mandatory prominent labelling 'do not flush' messaging for all wipes regardless of plastic content. It is also worth noting that research has identified that placing a 'please don't flush wipes' message close to public toilets has proved effective, and campaigns such as this to create new social norms should be considered. In conjunction with educating around reusable options, the Ministry should continue to support behaviour change around flushing wipes.

Finally, there are other non-biodegradable products entering the wastewater system which are also responsible for introducing plastic and causing blockages. These include sanitary products (the average pad can contain up to 90% plastic, and there is a significant amount in most tampon products as well). Facial tissues and kitchen paper often contain bonding agents – this can slow their breakdown and add to the blockage problem as well as introducing more chemicals to the wastewater system. We, therefore, call for funded behaviour change campaigns that can raise awareness of these issues and promote alternatives and subsidies for reusable products for low-income communities.

20. If you are a business involved with the manufacture, supply, or use of single-use plastic coffee cups or wet wipes (that contain plastic), what would enable you to transition away from plastic based materials in the future?

n/a

21. What do you consider an appropriate timeframe for working toward a future phase out of plastic lined disposable coffee cups and wet wipes containing plastic?

We support the goal of transitioning to reusable products as part of a circular economy, including a phase out of problematic single-use items. We are cognisant of pressures on the sector, however, we note that there are even greater pressures on our environment that cannot be ignored. We advise working with industry on these issues over the timeframes noted below.

Coffee cups

Much of the work around coffee cups should centre on education and behaviour so that single-use phase out can be effective. We support a gradual phase out of single-use cups which contain plastic linings or additives over the course of five years.

Wet wipes

Industry may have to take an innovative approach to how these products are made, not only in terms of materials, but in terms of moving away from single-use items to reusable resources. We support a transition time of three years for a wet wipe ban due to the issues these pose, in particular the blocking of wastewater pipes and the urgency with which we should address them. Our aim is to encourage industry to take an innovative approach to better solutions for this product by suggesting a shorter transition time.

22. Have we identified the right costs and benefits of a mandatory phase-out of single-use plastic items? If not, why? Please provide evidence to support your answer and clarify whether your answer applies to a particular item, or all items.

The TAO Forum agreed with all the benefits listed, but there are also additional benefits. The benefits are environmental, social and economic.

Environmental

1. It will encourage the use of reusable options.
2. There will be less plastic litter in the environment (streets, parks, streams, oceans) resulting in less harm to wildlife and fewer plastic particles within food chains. It will also reduce the amount of plastic in compost and therefore in soil.
3. It will encourage the transition away from non-renewable oil-based products which are responsible for carbon emissions from manufacture, freight and disposal.

Social

1. It will support the strengthening of social norms for reuse and foster a culture of reuse and recycling, rather than disposing of single-use items.
2. There will be amenity improvements due to less litter in the environment.
3. There could be the opportunity for new job creation or migration to circular jobs.

Economic

1. There will be less contamination in recycling services resulting in lower sorting and disposal costs.
2. There will be significantly less contamination in organic waste collections, particularly if single-use produce bags and non-compostable fruit stickers were banned resulting in lower sorting costs and the ability to make a higher grade of compost.
3. There will be lower collection and disposal costs for litter collection.
4. Businesses that manufacture, import and supply reusable items would benefit.
5. Some businesses would save money by no longer supplying these items to their customers e.g. single-use produce bags
6. It would create a level playing field for all businesses providing certainty and fairness.
7. There would be economies of scale for alternatives which would help to lower costs and drive innovation.
8. With many of the alternatives fibre or wood based, there may be an opportunity to produce more of these items on-shore in New Zealand using waste products from the timber industry.
9. Reuse options may eventually result in cost savings for consumers.

The TAO Forum agrees with the costs listed, but notes that most of these single-use items are currently imported from overseas rather than made in New Zealand so the cost of complying with this ban is likely to be less significant than the ban on pvc and polystyrene packaging.

23. How should the proposals in this document be monitored for compliance?

The TAO Forum recommends that the proposals be monitored for compliance, but also evaluated to see whether the aims of the legislation will be achieved.

It is important to monitor the level of compliance for target business sectors such as manufacturing, retail and hospitality sectors. At its simplest form, this could be a hotline where members of the public can email if they see a business selling a non-compliant product. This was used when the plastic bag ban was introduced with 375 alleged breaches of the ban reported in the first six months.⁶ Spot audits could also be undertaken in stores or businesses where compliance is likely to be more challenging e.g. sushi stores; \$2 shops for example.

Many councils and businesses undertake waste audits so asking these organisations to keep aside any branded examples of banned packaging so that businesses could be followed up is also an option.

It is also important to see if the legislation has achieved its desired aim. The TAO Forum identified three main aims and includes suggestions below as to how these could be evaluated.

1. Reduce the amount of hard-to-recycle plastic in use to enable a circular economy approach to waste management and reflect the waste hierarchy. Both supermarket chains have completed inventories of the types of plastic packaging in their brands. Funding a repeat of these audits after the ban has been implemented would determine to what extent the amount of hard-to-recycle plastics had been reduced.

⁶ <https://www.newshub.co.nz/home/politics/2019/12/almost-400-alleged-breaches-of-plastic-bag-ban-but-no-prosecutions.html>

2. Minimise the environmental impact of single-use items which are littered and make their way into our oceans and streams. Monitoring the amount and type of litter in the environment to see whether the rate at which these products have been littered has decreased.

3. Reduce the current level of contamination in kerbside recycling

If Flight Plastic is able to accept PET trays from a larger number of councils, that would also be a clear indication that the legislation had achieved its aim to reducing contamination in recycling. Council waste audits would also provide evidence that contamination had decreased. The Rethinking Rubbish and Recycling Project has benchmarked contamination and use of plastics and this audit could be repeated once the ban is in place.

Any evaluation could also include changes in public attitudes towards plastic products, packaging, litter and the general acceptance of these policies.