



wasteMINZ

Organic Materials Sector Group and TAO Forum Joint Submission on the Packaging Forum's Use Case

The Organic Materials and TAO Forum's Steering Committees would firstly like to commend Kim Renshaw and the packaging forum for leading this important piece of work.

Our overall comment is that where a product (for example, a container) is going to be made compostable it should be for all of this product type or none. The alternative is that the public and materials processors (composters and materials recovery facilities) have no certainty regarding specific items. If a product is made from either recyclable or compostable materials then both composters and recycling facilities will have to reject all items i.e. the recovery rate will be reduced.

We also question why materials that will end up in landfill would be made compostable. Examples include rubbish bags and many disposable items, particularly those with mixed materials like cotton buds, toothbrushes and dish scrubs identified in Table 2b.

Overall, some of the solutions don't focus sufficiently on reusables being a better option, despite the position statement with regards to the waste hierarchy. Please consider including more information about reusable alternatives alongside categories. For example, pallet wrap as a polymer is currently not recyclable – but reusable systems are being developed. The same applies to courier bags, where a courier company could move to a reusable bag system, which would be preferable to the suggestion that compostable courier bags be designed to be used as caddy bin liners. For example, toothbrushes, like razors, present an opportunity to move to reusables with smaller disposable/compostable components.

Q 1: Do you agree with the use-case Key Principles?

Yes but also think there is the need for two additional ones:

- A) If a product class (e.g. single use foodservice disposables) is to be made compostable then all of that product should be made compostable rather than having some items compostable and some recyclable. This just increases confusion and contamination.
- B) If an item is already able to be recycled in NZ by the majority of householders in their kerbside collection then it is not a good use case for an item to be made compostable (for example, meat trays).
- C) Where non compostable materials / products contaminate the organic waste stream – these should be made from compostable alternatives

Q2. Do you support ingredients labelling (to a certification managing body, not to the consumer) for compostable packaging processed in New Zealand compost facilities or home composts?

Yes

Q3. Do you agree with the proposed categorisation of compostable PACKAGING applications (and their material types) as proposed for commercial and home composting in NZ?

As per the comments in question 1, the Organic Materials Committee believes that if an alternative exists that can be practically recycled in New Zealand then this product should not be made in compostable materials. In addition, if it does not bring food nutrients with it then it should not be in compostable packaging (for example, produce bags are unlikely to generally bring food waste with them to a composter). As noted above, if packaging is to be made compostable it should be 'all or nothing' to avoid confusion and rejection of both compostable and recyclable material.

It may be that a life cycle Assessment (LCA) indicates net benefits of each item being produced as compostable as opposed to recyclable. Again, this relies on all such items being compostable or recyclable, otherwise all items need to be treated as a potential contaminant and removed to a reject stream. An example of the LCA approach is NZ Posts' Life Cycle Assessment of courier bags. In this case it was found that the bag with the least environmental impact was recycled NZ plastic. The production of courier bags using NZ sourced materials supports a market for the input materials and the used courier bags can be recycled in existing soft plastics collections.

Q4. Do you support items being included in the use-case if they are secondarily designed to bring food waste to compost? For example, a mailer bag specifically designed to have a second life as a caddy liner.

No because it would justify items that have no benefit being made from compostable packaging to be made from it for marketing purposes. It would open the floodgates for a variety of uses for compostable packaging that could be claimed to have a secondlife purpose of taking food waste to a facility. At a practical level there are risks that non-compostable materials are confused with compostable materials (creating contamination). There is also a high likelihood that compostable materials will be disposed of to landfill or as recyclable materials (creating contamination).

Q5. Do you agree with the proposed categorisation of compostable PRODUCT applications (and their material types) as proposed for commercial and home composting in NZ? Please give as much information as you feel is relevant.

The committee supports applications where products can contaminate the composting stream such as fruit stickers, tea and coffee bags, asparagus ties, banana tape, as well as lollipop sticks (made from compostable fibre). There may also be closed systems where it can be guaranteed that certain items are all compostable. Events utilising compostable service ware is an example.

The committee needs further understanding regarding the proposal for dish scrubbers and cotton buds (while supporting 100% plastic free cotton buds) as these are unlikely to contaminate compost streams. In addition, other items could arguable be made compostable that are generally not recyclable plastic such as toothbrushes.

Q6. Do you support a cross-industry agreed use-case for compostable packaging applications and materials for commercial and home composting?

Yes and it needs to have the voices of receivers fairly represented. Composters, TAs and recyclers are the main receivers of packaging (compostable, recyclable and otherwise) and need to be part of the use case decisions. If items are made compostable and cause issues for these receivers then those items risk breaching fair and accurate claim requirements of New Zealand's consumer legislation.