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Reducing the Impact of Plastic Consultation
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NEW ZEALAND BEVERAGE COUNCIL SUBMISSION ON PLASTICS CONSULTATION: REDUCING PLASTICS IN OUR ENVIRONMENT

INTRODUCTION

1. The New Zealand Beverage Council (NZBC) is the industry association for New Zealand's non-alcoholic beverage sector. Our members are the brand owners, manufacturers, bottlers and suppliers of New Zealand's juice, carbonated drinks, flavoured-dairy and bottled water brands. Our membership is made up of a wide range of companies operating in New Zealand – from some of the largest multinational brands in the world through to some of the country's smallest boutique producers, as well as those companies that provide a wide range of goods and services to beverage manufacturers. In total, our membership represents over 75 per cent of the non-alcoholic ready-to-drink beverages sold at retail level in New Zealand.
2. Beverage producers sell products to an end user who is responsible for making the choice about how to dispose of this product at its end of life, a decision that is typically made based on the packaging material. Our members utilise a range of materials to supply beverages, including aluminium, glass, PET and various other materials. While most non-alcoholic beverage producers are using plastic packaging material that are highly recyclable, such as PET or recycled PET (R-PET), there are less favourable materials in the market that have not found an alternative solution to date.
3. Beverage producers throughout the country have been working tirelessly for the last several years to shift away from some material types in favour of those that are easily recycled, have an existing market and are also introducing recycled content into new packaging.
4. The NZBC supports the following:
 - Mandatory phase out of hard-to-recycle-plastics, including oxo-degradable plastics;
 - Initiatives that reduce the impacts of hard-to-recycle plastics and litter in our environment;
 - Reducing the amount of recyclable material being sent to landfill;
 - Increasing collection for high value materials;
 - Equalising the minimum recycling standards across New Zealand and reducing public confusion.

QUESTION 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?

5. The NZBC agrees with the description outlined in this document as it relates to hard-to-recycle plastics, including PVC, polystyrene and oxo-degradable. As not all plastic types are easily recyclable, or lack both domestic and international markets, the New Zealand recycling system has become less efficient overtime. The NZBC holds the view that a ban on oxo-degradable plastics would improve the recycling of PET and reduce the contamination in the recycling stream.

6. The NZBC and its members are committed to supporting and driving change by ensuring that plastic materials used in packaging is easily recyclable and has a high market demand, such a PET, and improving New Zealand's circular economy. Beverage producers are working hard to lead by example and hope to bring other FMGC brands along the journey as well. Finally, it is also important to reduce public confusion about what various beverage packaging is made of in order to dispose of it properly at the end of its life.

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

7. The NZBC is supportive of initiatives that reduce the impacts of hard-to-recycle plastics and litter in our environment. The NZBC is also supportive of reducing the amount of PET and other high value material being sent to landfill and increasing the update of recycling these high value items. We believe that this is a key component to improving the circular economy, particularly for non-alcoholic beverage producers who mostly utilise PET.
8. PET is a highly recyclable material and has high demand from the non-alcoholic beverage industry. Increasing the collection and recycling of PET onshore will increase the uptake of recycled PET content that can go into the manufacturing of new beverage containers. However, it is critical these high value recycling streams can limit contamination of other materials to ensure that a high quality and affordable recycled product is available domestically.
9. As you will be aware, the New Zealand Beverage Council has actively been engaged with the Ministry for the Environment and the Working Group tasked to design a Container Return Scheme for New Zealand. The NZBC and its members are supportive of the collection of these high value plastics and believe that a successfully designed scheme can help close the loop and improve New Zealand's circular economy. The NZBC supports a collaborative effort between Government, industry and partners to establish a not-for-profit scheme that is fit for purpose.
10. The NZBC supports reducing public confusion and making recycling easier for all New Zealanders. It is important that consumers can clearly understand what their packaging waste is made of and how to dispose of it properly. We are supportive of equalising the minimum recycling standards around New Zealand so that no New Zealander is disadvantaged and has little option but to send products to landfill that are in fact recyclable.

QUESTION 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?

11. The NZBC agrees with the decision for a mandatory phase-out of hard-to-recycle plastics. We believe that a mandatory phase-out will drive the use and uptake of higher value plastics, such as 1, 2 and 5. A mandatory phase-out of hard-to-recycle plastics will also improve the consistency of materials collected at kerbside, reduce contamination and improve New Zealand's circular economy.

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

12. The NZBC holds the view that oxo-degradable plastics can be harmful to the environment and contaminate the recycling stream of other valuable plastics. We agree with a mandatory phase-out of all oxo-degradable plastics by 2023. There are other plastics to replace any oxo-degradable beverage containers, such as PET or R-PET, as well as other various materials that can be recovered and recycled to increase our circular economy.

QUESTION 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.

13. The NZBC holds the view that the right cost and benefits have been addressed as it relates to non-alcoholic beverage producers, who may manufacture their own packaging materials or import packaging from overseas. We agree that the main beneficiaries of a mandatory phase-out proposal are the

environment and the wider resource recovery sector including recyclers, re-processors and waste operators.

QUESTION 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?

14. Packaging and post-consumer waste at large is an issue that several industries face and it will require a collaborative approach. Members of the NZBC have been leaning into this issue for several years and are committed to doing the work required to improve the outcomes for our environment and reduce the amount of recyclable plastic from beverage containers going to landfill.
15. The NZBC is concerned about the move away from some hard-to-recycle plastics to other material types that are also harmful. To ensure a successful move away from hard-to-recycle plastic packaging, clear regulation and definitions will be required, as well as further scope into what sustainable alternatives are available in the market.

QUESTION 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.

16. The NZBC is supportive of the phase-out and banning of plastic straws, plastic drink stirrers and single-use plastic cups made from hard-to-recycle plastics. We hold the view that plastic cups made from plastics 1,2, and 5 should be exempt as they are higher value materials with a market demand for collection and recycling.

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

17. The NZBC seeks clarity on the definitiveness of exempting single-use plastic cups made from plastics, 1,2 or 5.

CONCLUSION

18. Beverage manufacturers strive as an industry to do their part in creating a more sustainable and circular economy. The NZBC and its membership is committed to reducing waste and increasing recycling collection, banning hard-to-recycle plastics and ultimately reducing consumer confusion.
19. Thank you for taking the time to consider our comments. Please do not hesitate to contact me should you require further information. The NZBC looks forward to continuing to engage with the Ministry for the Environment as a trusted partner on issues around plastics, recycling and circular economy in due course.

Sincerely,



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