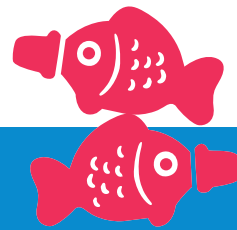


SUMMARY

**SUBMIT YOUR FEEDBACK**

**ON THIS**

**GOVERNMENT  
PROPOSAL:**



**'REDUCING THE  
IMPACT OF PLASTIC  
ON OUR ENVIRONMENT -  
MOVING AWAY FROM  
HARD-TO-RECYCLE  
AND SINGLE-USE ITEMS'**

A GUIDE BY

**TAKEAWAY THROWAWAYS**



**#TakeawayThrowaways**

# USE YOUR DEMOCRACY.



In a nutshell, the Government is proposing to ban a bunch of plastic products, including some single-use plastic items.

They want to know what **YOU** think about this.

You can submit your feedback before **4 DECEMBER 2020**. The Ministry for the Environment's online form is the simplest way to send your submissions.

You will find a link to the form at **takeawaythrowaways.nz** or via the **@takeawaythrowaways** bio.

The form is easy to navigate. Questions are presented like this:

Adding opinions in the notes section is optional, but the more detail you give, the more weight your submission will have. **This guide by Takeaway Throwaways (TATA) will help you get started.**

You are welcome to use these words in the notes section of your submission. Your participation is valuable and vital to create change. If you do not have time to submit your thoughts in full, that's ok.

Visit **zerowaste.co.nz** to find a template submission you can copy, paste & play around with OR head to **greenpeace.org.nz** to find a template you can submit in one click.

Encourage others to have their say. Democracy only works for us if we use it. You can make a real impact by sharing these stories on your social media. **Thank you, so much.**

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?

Position

- (Not specified)  
 Yes  
 Yes in part  
 No (please comment below)

Notes

**PLEASE NOTE:** this is a summary of our submission. To read the full version of the **Takeaway Throwaways** submission, the zero waste community's joint submission, and full details of The Government proposal, head to **takeawaythrowaways.nz** or follow the **link in the @takeawaythrowaways bio.**

# 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?

## DO WE AGREE?

Yes, in part.

The Government gave a good description of the problems the targeted plastics can cause.

But, the problem isn't just about plastic - it's about how **all** materials are used in a single-use, linear economy. Using **any** item only once then throwing it 'away' wastes energy & resources & harms Papatūānuku.

We urge the Government to consider the broad impacts of 'single-use' systems, regardless of material type, and then propose more concrete policy actions it will take to create a culture of reuse.



## QUESTION 2

Have we identified the correct objectives?

If not, why?

## DO WE AGREE?

Yes, in part.

The Government's objective to reduce hard-to-recycle & single-use plastics by eliminating some of them is **VITAL** for a circular economy.

But, eliminating things is only part of the picture. We urge the Government to set the equally vital goal of:

**Increasing access to reusable alternatives & the systems that support them.**

Embracing reuse is key to reducing single-use plastics & plastic pollution, & will help NZ move up the waste hierarchy & avoid false solutions like single-use items made of other materials.



# QUESTION 3

Do you agree that the options listed for shifting away from hard-to-recycle and single-use plastics are the correct options to consider? If not, why?

## DO WE AGREE?

Yes, in part.

The options list covers key actions we'd expect to see.

**However**, we have two concerns.

### CONCERN 1

There is currently no **'blended' Option** where the Government does more than one thing at the same time.

E.g. banning the targeted plastics, but also implementing levies, reduction targets, compulsory labelling & product stewardship requirements for other troublesome items.

### CONCERN 2

The list is missing some key policy options that could help grow reuse.

E.g. deposit return systems for takeaway packaging, mandatory reuse targets & "reusables only" for dine-in situations.

Did you know that there are international examples of disposables being banned in some public places, Government offices & university campuses?



# QUESTION 4

Have we identified the right criteria (including weightings) for evaluating options to shift away from PVC and polystyrene packaging, oxodegradable plastics and some single-use items?

If not, why?

## DO WE AGREE?

Not specified.

The criteria & weightings make sense & help us understand the Government's reasoning behind the proposals.

We suggest more importance is given to how well each option targets the top layers of the **waste hierarchy**.

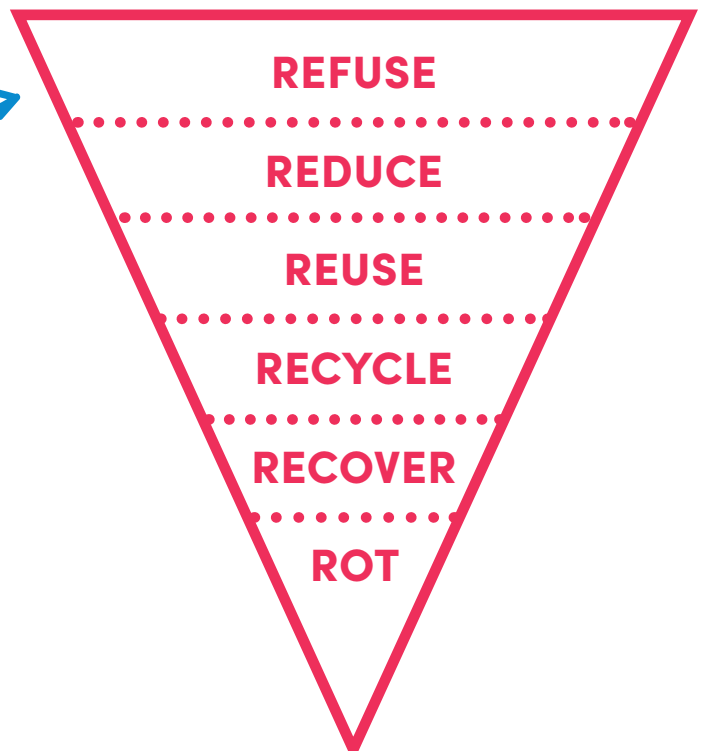
Some criteria need broader definitions:

**"Effectiveness"** should consider whether the options boost reuse.

**"Achievability"** should consider more than whether new legislation is needed.

We also suggest new criteria around how well the options promote accessibility, and whether they limit risk of loopholes & unintended outcomes.

### START HERE



## 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?

## DO WE AGREE?

Yes, in part.

We support banning all the items listed (except for plastic straws – more on that later). Bans are a clear, simple way of getting rid of things we don't want in our community.

But, we urge the Government not to take a 'ban only' approach & instead to multi-task & take forward more than one option at the same time.

### **The EU did it with their Single-Use Plastics Directive - we can too!**

A 'ban only' approach probably won't be enough to lift up the best alternatives. Plus, it leaves the Government without tools to tackle problem items it isn't ready to ban yet.

The Government can level the playing field between single-use & reuse, & reduce the negative impact of a wider range of items, by **combining bans with regulatory policies** like levies, deposit return systems & labelling requirements.



# QUESTION 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?

## DO WE AGREE?

Yes, in part.

The two-stage approach makes sense as some items are easier to phase-out than others.

**But, the timelines proposed are too slow.**

Think of all the targeted plastic items that could enter our environment before 2023 and 2025.

Right now, the world is on course for global plastic production to double in the next 20 years, and for the flow of plastic into the ocean to triple by 2040.

**We need to reverse these trends, fast.**

The EU will ban many of these same items by July 2021.

We suggest bringing the Stage 1 and 2 timelines forward to June 2021 & June 2023, respectively.





# QUESTION 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?

## DO WE AGREE?

Yes.

Using our democracy isn't only about speaking up when we disagree. It is also about giving our consent and approval when we feel the Government gets it right.

So, we're **thanking the Government** for creating what we think is an expansive & ambitious list of products for a phase-out.



## QUESTION 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.

Question 8 of the submission is out of scope for **Takeaway Throwaways**.

But please check the rest of our submission guide page on our website to connect with resources from your wider zero waste community for pointers on responding to this question.

## QUESTION 9

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

Question 9 of the submission is out of scope for **Takeaway Throwaways**.

But please check the rest of our submission guide page on our website to connect with resources from your wider zero waste community for pointers on responding to this question.



## QUESTION 10

Do you believe there are practical alternatives to replace hard-to-recycle packaging (PVC, polystyrene and EPS)?

If not, why?

## DO WE AGREE?

Yes, in part.

Loads of alternatives exist to the hard-to-recycle packaging the Government wants to ban.

But the best alternatives are reusable, refillable & accessible, followed by highly recyclable with recycled content.

If the Government wants these best alternatives to be everyone's go-to, practical option, then it must act to level the playing field between single-use & reuse.

### For example...

- Invest in reuse systems
- Levy single-use items
- Implement Deposit Return Systems on all food & beverage packaging
- Mandate reusables for 'dine-in' contexts
- Introduce mandatory reuse quotas/targets
- Implement mandatory recycled content regulations

We also call for Government oversight to ensure reuse systems & products are designed to **maximise accessibility & minimise GHG emissions.**



## QUESTION 11

Do you agree with a mandatory phase-out of all oxo-degradable plastics by January 2023?

If not, why?

## QUESTION 12

If you manufacture, import or sell oxodegradable plastics, which items would a phase-out affect? Are there practical alternatives for these items?

Please provide details.

## DO WE AGREE?

Yes.

Thank you (Government) for proposing a blanket ban on oxo-degradable plastics - we wholeheartedly support this.

The EU are banning them by July 2021 - Just sayin'.

Question 12 of the submission is out of scope for **Takeaway Throwaways**, but it might not be for you!

Would an oxo-degradable plastic product ban affect your business or organisation?

Even if you don't make or use these products, if other businesses or organisations like yours **do**, then it's worth sharing with Government why or how you manage to operate just fine without these products.

Head to [@uyo.nz](#) for help with collating your answer.



## 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.

## DO WE AGREE?

Yes.

The Government has drawn up a comprehensive list of costs & benefits.

We agree with all of them.

We appreciate that the Government has recognised the **potential cost savings for retailers if customers BYO containers** & the cost savings for the wider community from simplifying our waste & recycling streams.

We also like how the Government has recognised that bans help to put all retailers in the same boat.

Overall, we think the analysis would be more meaningful if the environment was not treated as an affected party separate to our human or economic benefits – human society (including the economy) can only thrive if our planet is well.



# QUESTION 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.

There is an extra benefit to banning the targeted plastics that the Government has missed...

The opportunity for businesses & communities to develop reuse schemes & reusable packaging systems to replace the banned items.

Reuse schemes & reusable packaging systems not only reduce waste, they also create more jobs than recycling or landfilling packaging.

More reuse schemes & more reusable packaging will also mean **less throwaway packaging overall** (not just targeted plastics).

This will = **even more** cost savings for local government & ratepayers.

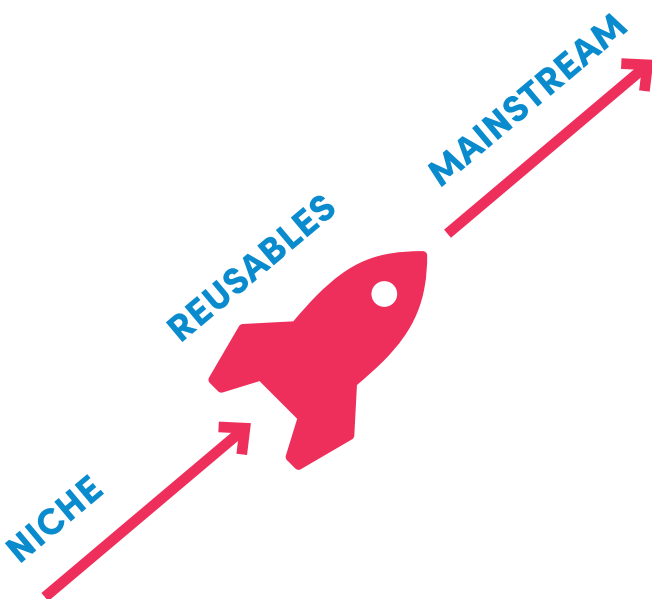


# QUESTION 15

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?

The main thing that would help New Zealanders embrace reusable & refillable packaging is if the Government were to give reusables some love through the power of regulation, policy & investment.

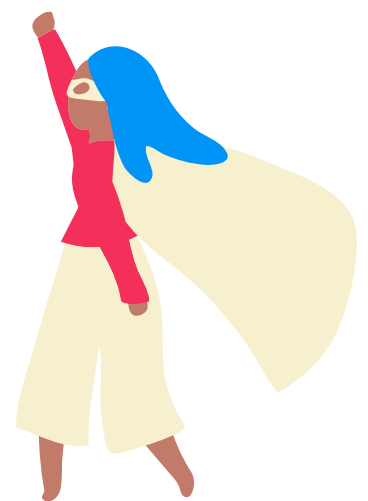
This would help reuse systems compete against single-use, & catapult reusables from the niche to the mainstream.



Also, reusable products & systems must be accessible & affordable for everyone in our community, and reflect **Universal Design principles**.

The Government has suggested it could do some public education about sustainable packaging.

Thanks Government, but heaps of NGOs & community groups do this mahi already! We need you to back us up by focusing on your unique superpowers of regulation, policy & investment.



# QUESTION 16

What do you think about the proposed mandatory phase-out of some single-use plastic items (see table 7)?

## DO WE AGREE?

Yes, in part.

We fully support banning all the listed items, including their oxo-degradable, degradable, biodegradable & compostable plastic counterparts.

**However, we have 3 points** that we feel strongly about:

1. We don't support banning plastic straws.
2. We're astounded the single use coffee cup (SUC) is not on the ban list.
3. We'd like to see more harmful throwaways added to the ban list.

### 1. WE DON'T SUPPORT BANNING PLASTIC STRAWS.

Here's why:

A plastic straw ban would be discriminatory.

Some people need a plastic straw to drink. Reusable straw alternatives work well for some people, but not for everyone.

The Government has suggested exemptions for people that need them but it's currently hard to design exemptions that aren't stigmatising.

**At the very least**, there must be adequate consultation & agreement with the disabled community **before** we can support banning plastic straws.





## 2. WE'RE ASTOUNDED THE SINGLE USE COFFEE CUP (SUC) IS NOT ON THE BAN LIST.

A rapidly growing movement encouraging the end of this “branded litter” **already exists within NZ** cafe culture & communities.

NZers use 295 million coffee cups a year.

Virtually all get landfilled, pollute the environment or contaminate recycling.

The lids are fully detachable, which also increases the potential for litter.

There are many current practical alternatives. Reuse systems & BYO ‘keep cups’ are commonplace.

Hundreds of cafes are voluntarily employing tactics to reduce & remove disposable cups...

- SUC surcharges
- Jar swap systems
- Mug libraries
- BYO discounts
- Retailing reusable cups

We know of **over 50 cafes nationwide that have entirely eliminated SUC** from their establishments... And they’re thriving. This proves that there are alternatives & that banning SUC is viable.

For the vast majority of vendors, the option to use a dine in cup **has & always will be** a feasible & accessible alternative. A ban on SUC combined with Government support for reuse schemes can provide security for takeaway only venues.

Disposable coffee cups are a significant financial burden upon hospitality businesses.

**Their existence only financially benefits packaging companies.**

These companies are aware of the changing public perception to disposable cups, & are positioned to diversify.



### 3. WE'D LIKE TO SEE MORE HARMFUL THROWAWAYS ADDED TO THE BAN LIST.

The harmful throwaways we'd like to see added to the ban list.

- **PLASTIC LOLLIPOP STICKS**  
Are just as hazardous as plastic cotton buds. Cardboard can be used instead.
- **SINGLE-SERVE/PCU CONDIMENTS**  
Like soy fish, pottles for jam, butter & other condiments, sugar & sauce sachets, mini confectionary wrappers. Also, plastic coffee pods.

The Government should introduce place-based bans for items it won't ban completely yet.

#### For example:

- Reusables only for dine-in contexts
- Central city single-use-free zones
- No bottled water & throwaway serviceware on university campuses & in Government buildings.

#### To recap

We fully support banning all the listed items, including their oxo-degradable, degradable, biodegradable & compostable plastic counterparts.

However, we suggest that the Government...

- Removes plastic straws from the ban list.
- Adds single use coffee cups to the ban list.
- Adds more harmful throwaways to the ban list.



# QUESTION 17

Do the proposed definitions in table 7 make sense?

If not, what would you change?

A big **YES** to banning oxo-degradable, degradable, biodegradable & compostable plastic versions of the listed items.

Why? Because all these different degradable plastics are **hardly ever disposed of correctly.**

- They can still harm wildlife if they get into the environment.
- They contaminate recycling & organics collections.
- They're still single-use items that waste energy & resources.

Additionally, the plastic straw definition proposes exemptions to allow access for disabled persons & medical purposes.

If the Government does decide to ban plastic straws, we would support an exemption because some people need a straw to drink. **HOWEVER...**

... poorly drafted exemptions can be stigmatising & expose people seen using a plastic straw to possible public backlash. The proposed exemption **has not been drafted & included in the consultation document**, so it's impossible to assess its potential impact.

## DO WE AGREE?

Yes, with changes.

The submission form also contains no question on the appropriateness of banning plastic straws or an exemption, indicating the Government isn't taking this issue as seriously as it should.

**Overall, we don't believe this consultation process upholds the active participation of the disabled community.**

Other reasons why we do not fully agree with the proposed definitions in table 7 are...

- We do not support exempting disposable coffee cups & lids from a ban (see our answer to Q16)
- We do not support exempting single-use cups made of plastic 1, 2 & 5. This exemption definitely shouldn't cover lids as their size & detachability make them hard-to-recycle & prone to becoming litter.
- The definition of single-use plastic tableware should be broadened to include plastic-lined cardboard bowls & containers.



## QUESTION 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.

## DO WE AGREE?

Depends on the item.

We believe a 12 - 18 month time period would be achievable for most items.

For some items, the Government needs to have conversations with parties likely to be affected by the ban, which may require a longer timeframe.

For example, if plastic straws are to be banned, the Government must take the time to properly draft the exemption to ensure access for the disabled community (see our answers about this in Q17).



# QUESTION 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.

**Takeaway Throwaways** focuses on serviceware, so we will only discuss disposable coffee cups here.

For discussion of options for wet wipes, please check the rest of our submission guide page on our website to connect with resources from your wider zero waste community for pointers on responding to this question.

## To reduce the use of single-use coffee cups...

We believe the most impactful thing the Government can do is use regulation, policy & investment to increase the uptake, accessibility & availability of reusable alternatives to throwaway coffee cups. **Note:** accessibility includes affordability.

## REGULATORY & LEGISLATIVE ACTIONS

- Put disposable coffee cups on the ban list. This will stimulate industry alternatives & motivate consumers to engage w/ alternatives faster.
- Mandate reusables for dine-in customers (as in Berkeley, California)
- Compulsory labelling on disposable coffee cups to inform consumers about reusable alternatives & a ban on branding cups.
- A 'latte' levy and/or producer fee on all disposable cups put on the market to cover estimated costs associated with clean-up or disposal.
- Update food safety legislation to require outlets to accept clean BYO cups.



## REGULATORY & LEGISLATIVE ACTIONS

### A Deposit Return Scheme (DRS)

- Introduce a DRS for ALL takeaway coffee cups dispensed by outlets, whether they are disposable cups OR reusable cups offered through a reuse scheme.
- In a DRS, the customer pays a small deposit on top of the purchase price of their drink. They get the deposit back if they return the empty cup.
- Deposits are already used for cup reuse schemes. A DRS for ALL takeaway cups would reduce litter & recycling contamination & level the playing field between reuse & single use.
- DRS will work best if combined with a mandatory cup take-back policy for all outlets that give out takeaway cups. The outlet can dispose of returned disposable cups appropriately, or wash & reuse returned reusable cups.

## COLLABORATIVE, PRACTICAL POLICY ACTIONS

- Invest in the infrastructure needed for reuse schemes to work well, e.g. reverse logistics & sterilisation services.
- Work with MOH, MPI & hospo owner/operators to create official guidelines for reusable serviceware so that businesses & the public feel confident about the safety of reuse.
- Introduce well-publicised disposable cup-free zones (e.g. university campuses & Government buildings) & phase-out disposable cups from public procurement

- Ensure that reusable cups & reuse schemes follow Universal Design principles & are accessible for everyone in the community.

We note that many of these actions can happen under s 23 of the Waste Minimisation Act **without the need for new Parliamentary legislation.**

The Government have their own suggestions for reducing the use of single-use coffee cups (with any type of plastic lining). **This is what we think of their suggestions...**

- The Government suggests it could invest in scaling up reuse systems. We support this alongside regulatory & policy interventions that remove some of the barriers to the growth of reuse schemes. Doing both will be most effective & efficient.
- Investing in alternative disposable products or systems to downcycle or compost cups is not a good use of public funds. Better to put this money towards stimulating a reusables network.
- We urge the Government not to use its finite resources to reinvent the wheel & run a public education campaign about reusables. Many NGOs & community groups already do this mahi. **We need Government to back our efforts** with its unique policy & regulation-making superpowers. We need Government to champion and amplify the positives of truly circular reusable options.



## QUESTION 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?

We invite the Government to consult with the 50+ hospitality businesses who are SUC free, and the organisations and small businesses around NZ that support their work such as:

- **UYO (Use Your Own)**
- **SUC-free Wanaka**
- **Again Again**
- **Cupcycling**
- **Good to Go Waiheke**
- **Grey Lynn Koha Jar Project**
- **Wanakup**

These businesses & groups report that the availability of reuse systems and cup loan schemes (and customers who BYO!) enables businesses to move entirely to reuse.

And, many more businesses would be willing to ditch the disposables if they knew all outlets were going to be in the same boat – something a ban could achieve.

Has your business or organisation gone SUC free? **If so, share with the Government how that's gone for you.**

What's made it work? What could have made it even easier? If you've had a positive experience without single-use cups, let the Government know it's possible! Your perspective is so useful and is one that no one else has!



# QUESTION 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?

**Takeaway Throwaways** focuses on serveware, so we only discuss disposable coffee cups here.

For discussion of timeframes for wet wipes, please check the rest of our submission guide page on our website to connect with resources from your wider zero waste community for pointers on responding to this question.

Disposable coffee cups should be included in the list of items proposed for phase-out. We should be seeking to **remove them from the economy well before 2025.**

**Accessible alternatives exist.** Were the Government to commit to supporting reuse schemes & to developing and amplifying guidance (see Q19), we see no reason why disposable coffee cups cannot be amongst the first to be phased-out, i.e. by 2022.





## QUESTION 22

Have we identified the right costs and benefits of a mandatory phaseout 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.

We appreciate the recognition of the potential cost savings for retailers if more reusables are used & the cost savings for the wider community from reduced waste & litter.

We like how the Government has recognised that bans help put all retailers in the same boat.

## DO WE AGREE?

Yes, in part.

The list of costs & benefits is comprehensive; we agree with them all.

**However,** we are surprised by two things:

- We are surprised that this list does not acknowledge how a plastic straw ban could negatively affect individuals who need a plastic straw to drink.
- And we are surprised by the lack of mention of the positive opportunity for businesses & communities to develop reuse schemes & reusable alternative products (i.e straws, codesigned with the disabled community) to replace the banned items.

Reuse schemes reduce waste & costs for local government & ratepayers. They also create more jobs than recycling or landfilling packaging.



## QUESTION 23

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

**A compliance and enforcement strategy is needed** because the range of products being proposed for a ban is quite wide and will impact a variety of sectors, industries, businesses, organisations and individuals.

So, the potential for noncompliance to slip through the cracks is quite high.

We saw with the plastic bag ban that some businesses did push the limits of the law and after a year, 400 breaches were reported.

Given the scope of the present proposal, which goes well beyond the plastic bag ban, we support **the appointment and resourcing of enforcement officers**, alongside relying on community members to report breaches.

**THAT'S IT.**

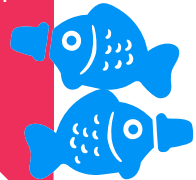
Well, that's it for our **summarised** submission.



# THANK YOU SO.



Find more info about the proposal, our **full submission** & a joint submission by NZ's wider zero waste community via the **@takeawaythrowaways** bio



**#TakeawayThrowaways**