

Independent Consultant (Sarah Meads)**Submitter Type:** Individual**Source:** Web Form**Overall Position:** Support**Overall Notes:****Clause**

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?

Position

Yes

Notes

I support the banning of microbeads in personal care products. The impact of microbes on our environment and species, not just on human health, is of major concern. There is strong evidence beads are ingested by sealife that are later consumed by humans. We still do not have adequate evidence about the impact of human ingestion of plastic via the vector of seafood, though some studies have suggested long-term effects on brain function, and a possible relationship with the onset of Alzheimer's disease. The ingestion of microbeads is obviously a problem for marine life - it is unclear how microbeads move up the foodchain, but studies suggest that bigger animals eating smaller animals that have ingested microbeads (or other plastics) is a problem, indicating that microbeads can have a cumulative and multiple impact (underscoring the urgency of regulating them). The science is unequivocal that microbeads are harmful in the natural environment (even if exact quantification of this harm is not yet available), so a ban is more than appropriate. I also believe it is important that the Government move to ban/regulate microbeads (rather than simply allow a market-based solution), because it will be more efficient, effective and measurable than voluntary regulation. In addition it will demonstrate New Zealand is taking a leadership role internationally in setting a standard for our own businesses operating in this sector and exporting our goods and services overseas and encouraging other countries to do the same. Finally, I support a ban because it will increase consumer awareness about microbeads and the severity of the threat they pose to environmental and human health. This 'awareness-raising' function of a ban is important, in light of the fact that the proposed regulation will not cover importation and use in New Zealand. Hopefully a ban for manufacture and sale will raise consumer awareness with the collateral effect of reducing importation and use of these products too.

Clause

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?

Notes

I am in favour of the Government taking a wider, rather than narrower, definition of the scope of personal care products containing microbeads. I think that the risk of unintentionally covering necessary products with the ban can be addressed in other ways.

Clause

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

Position

No

Notes**Clause**

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

Position

No

Notes**Clause**

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?

Position

Yes

Notes**Clause**

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?

Position

No

Notes

Clause

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?

Notes

Create the market rules and new product innovation will come. Place the environment and species first.

Clause

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 in the Managing microbeads in personal care products consultation document?

Notes

The Government should produce a list of current products for sale in New Zealand containing microbeads, to assist retailers to be as informed as possible, to avoid inadvertently selling products containing microbeads (or any other way to increase information about microbead-containing products - such as labelling, etc).

Clause

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?

Notes

The consultation document states "sometime in 2018", which could mean 1 year, or the best part of 2 years from now. Given the limited number of personal care products containing microbeads in New Zealand, and the absence of any manufacturers of personal care products with microbeads in New Zealand, I would expect that the phasing out time required should not be particularly long. Accordingly, I do not think the timeframe for entry-into-force should be much later than 1 year from now (i.e. beginning of March 2018). I am of the view that reducing plastics in the ocean (of which microbeads are a part) is urgent. We should be able to tackle the low-hanging fruit, like microbeads, as quickly as possible, otherwise that leaves little hope for addressing more difficult plastic-waste-related challenges.

Clause

Wider marine litter

Notes

Furthermore, a ban on microbeads will support a growing culture of non-tolerance towards plastics in the ocean, which hopefully can be leveraged in the future to address other forms of plastic waste that are toxic to our environment and biodiversity.