

28 February 2017

Microbeads consultation  
Ministry for the Environment  
PO Box 10362  
WELLINGTON 6143

Email: [microbeads.submissions@mfe.govt.nz](mailto:microbeads.submissions@mfe.govt.nz)

Dear Sir/Madam

### **Managing microbeads in personal care products**

NZFGC welcomes the opportunity to comment on the consultation paper *Managing microbeads in personal care products*. The vast majority of cosmetic products for sale in New Zealand are manufactured overseas in regimes that already prohibit the use of microbeads as the consultation paper clearly sets out. New Zealand has successfully leveraged off these regimes without the cost of legislation or enforcement such that the vast bulk of companies selling into New Zealand do not use now or, for those concluding their phase-out, will not be using microbeads in any of their products by the end of 2017.

If this legislation is to be pursued, then we believe definitions are critical to ensure consumers are not deprived of the broad range of personal care products they now enjoy. We recommend that 'plastic microbead' is defined as:

"any solid plastic particle that is less than five millimetres (5mm) in size and is intended to be used to exfoliate or cleanse the human body or any part thereof."

In this context, 'plastic' also must be defined as:

"synthetic water insoluble polymers that are repeatedly moulded, extruded or physically manipulated into various, solid forms which retain their defined shapes in their intended applications during their use and disposal".

The aspects covered in these definitions are very important to include to avoid the unintentional capture of other polymeric raw materials. In summary, NZFGC recommends that the scope of microbeads that might be prohibited are:

- material – to be plastics as defined above;
- shape – defined as microbeads;
- size – less than 5mm; and
- useage – for exfoliation or cleansing in rinse-off cosmetic products only.

Yours sincerely



Katherine Rich  
**Chief Executive**