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**Submission to the Ministry for the Environment on the
Discussion Paper: Product Stewardship and
Water Efficiency Labelling**

Introduction

The National Council for Women (NCWNZ) is an umbrella organisation for women's groups throughout the country, with 32 branches and 40 nationally organised societies affiliated to it. There are also several individual members. The Council works especially towards bettering conditions for women and families, and generally for society, by disseminating information amongst its membership and by passing women's opinions on to decision makers, through responding to requests for submissions. This submission was prepared using the responses from 14 branches and member groups and a number of individuals to a request to answer some of the questions posed in the discussion paper.

Summary of opinion

NCWNZ is very pleased to have the opportunity to comment on this discussion paper, as the membership has almost since the inception of the Council in 1896 had a strong interest in the protection and preservation of the environment, and has always advocated for measures that allow consumers to make informed choices when purchasing goods. NCWNZ has in the past urged its members to be frugal in their use of resources, to manage their own environments so as to minimise wastes, and to act as conduits for passing on information on good environmental practice to other sectors of society. In 1989 NCWNZ sent a resolution from that year's annual conference to the Minister for the Environment and appropriate regional authorities asking them to establish programmes to educate producers and consumers in the need for recycling waste, and reducing packaging, especially plastics. In 1991 NCWNZ studied TELARC's papers on 'Environmental Choice New Zealand' and submitted comments endorsing the aim of the project to educate consumers on making choices that would be best for the environment.

NCWNZ is now delighted to see this most recent endeavour to fashion tools that will tend to foster sustainability in our use of resources, but an NCWNZ submission of February 1992 on 'Directions for Better Waste Management in New Zealand' does foreshadow product stewardship. NCWNZ said then, "NCWNZ agrees that more emphasis on prevention is necessary. The Resource Management legislation does not appear to be adequate to deal with the problem because of its greater emphasis on mitigating effects rather than avoiding them." In February 1990 we said, "We are very pleased that it is proposed to take account of all environmental factors throughout the life cycle of the product, the impact from cradle to grave."

NCWNZ opinion is divided as to whether voluntary schemes will be as effective as they need to be; some members believe that only legislation will achieve the desired effect, while others are supportive of suggested Option 4, The Preferred Approach. One of our members was able to provide a discussion on what is happening in many Australian states, where after legislation having been introduced, impressive results are being achieved in many areas of waste minimisation.





Recommendations

NCWNZ would like to make three general recommendations, aside from answering the questions directly:

1. that the five objectives stated in Chapter 3 of the discussion document be retained as founding principles for product stewardship schemes;
2. that further work be done by the Ministry to broaden the scope of the proposed policy formation. There need to be integrated policies that reduce barriers to product stewardship potential for both large and small volume consumer items, and that allow fair participation for businesses large and small;
3. that central government take a stronger lead role in creating an integrated legislative and regulatory structure that will allow government, councils and industries to work together easily to achieve the desired objectives for product stewardship.

The questions

Because some of the questions on product stewardship were more directly aimed at members of industries, not all of them were put to the NCWNZ membership, but we included all questions on water efficiency labelling.

1. What are your views on the priority product areas for product stewardship schemes in New Zealand? Give reasons.

NCWNZ commends those industries which have already set up voluntary schemes for managing what they produce throughout the product's lifetime.

Members endorse the list of priority products which is set out in the paper, particularly emphasising batteries, old tyres, whiteware, motor vehicles and computers along with all their additional components. Plastic goods and part-empty containers of household chemicals had some mention, while a rural member cited artificial fertilisers. Reasons given were that these items are very common, very polluting, expensive to produce by conventional methods, and particularly difficult to dispose of in a responsible way. Many electronic items though past their useful life contain components that can be retrieved for re-use.

2. What assessment process should precede any decision to introduce product stewardship schemes?

NCWNZ suggests this process:

- identification of priority waste products
- industry and community consultation on desired outcomes
- prioritisation then of products
- identification of economic issues and assessment of their relative importance
- identification and assessment of the possible environmental impacts, both desirable and undesirable, of introducing the schemes.

One branch made the sensible suggestion that part of the assessment process could include studying similar schemes set up in other countries, to determine their viability and practicability in New Zealand.

5. What role should the Ministry for the Environment play in the development of Product Stewardship schemes?

The Ministry should certainly play a part in developing such schemes, initially by encouraging targeted industries to cooperate in introducing them, by providing supporting information and education, and then by assisting industries in the actual establishment of the schemes. The Ministry could provide capacity-building programmes for participants, and it could initiate discussions amongst participants as to what level of monitoring and inspection would be appropriate, and whether any penalties should apply to backsliders.



6. What circumstances would justify government regulation of product stewardship schemes?

A sensible first step for product stewardship schemes would be to encourage establishing voluntary, self-regulated schemes with a given time-frame for implementation and the Ministry for the Environment carrying out monitoring during this initial phase. If little progress is made in reaching the desired objectives, and there appears to be little will amongst participants to reach them, then government intervention would be justified. Criteria would be the time dimension, the need to address possible inadequacies in the original design of the scheme; and obvious inertia amongst the participants.

8 Should government ensure an equivalent acceptance of environmental responsibility by all companies by regulating companies who may gain a competitive advantage by not participating in a product stewardship scheme?

NCWNZ gave an unequivocal 'yes' in answer to this question, though one member qualified her agreement by suggesting that companies with a market share of less than 2% could be exempted.

9. Is there a case for including mandatory product stewardship tools such as deposit-refund schemes in a product stewardship policy?

NCWNZ members believe that there is a case.

10. How should the costs of product stewardship schemes be met?

NCWNZ members are universally in favour of having the producers of waste bear the cost of the schemes. It was pointed out that because councils could benefit from reduced waste by not needing to spend so much on waste management, rate-paying citizens too might feel the benefit of rate reduction.

12. How can assurance be given that products manufactured domestically and imported are both included in product stewardship schemes and treated evenly?

NCWNZ members suggested levies, licensing, clauses in trade agreements and developing environmental acceptability standards for imported goods.

Water Efficiency Labelling

14. Would labelling influence your purchases of whiteware and plumbing products?

It would be a significant factor for most NCWNZ members, although price would also be a consideration for some. One group remarked that it could be made obligatory for all new houses to be built with water efficient appliances. Labelling for water efficiency is seen as a good thing as it will assist consumers in making wise choices when purchasing these products, especially as New Zealand, like most other countries, faces the certainty that in just a few years, no water will be pure.

15. Would there be any savings to you or to your council from reducing domestic water usage?

Because many towns and cities do not have water metering, there would be no individual advantage in reducing water usage, but councils would certainly realise savings if domestic usage were reduced. Nelson Branch noted that since domestic and industrial water metering was introduced in that city in 1999, water consumption during peak use times has dropped by 25%. Fixed costs for reticulation and purification however remain the same.



16. Do you think water efficiency labelling for whiteware and plumbing products should be mandatory?

Yes. However, there would need to be verification that whiteware and plumbing products are as efficient as they claim to be, and they should also measure up to an internationally accepted standard.

17. What do you think would be the effect on New Zealand businesses if we were to align our water efficiency labelling scheme with Australia's?

NCWNZ members felt they could not comment very helpfully on this question because of not knowing what Australian requirements are, but felt that businesses that use a lot of water in manufacturing their products could benefit from using equipment that they know to be very water efficient, while businesses that manufacture whiteware and plumbing products that align with Australian requirements might find an expanded market for their products.

Conclusion

NCWNZ is pleased that the Ministry for the Environment is endeavouring to find ways to reduce waste and to use resources less wastefully, as with a crowded world there is inevitably going to be increased competition to survive, and survive healthily. Only by resolutely introducing and accepting measures that lead to a healthier environment will New Zealanders ensure a happy future for their descendants.

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