

20 February 2017

Microbeads consultation
Ministry for the Environment
PO Box 10362
Wellington 6143

By email: microbeads.submissions@mfe.govt.nz

**SUBMISSION on
"Managing microbeads in personal care products" consultation document**

1. Introduction

Thank you for the opportunity to make a submission on the above microbeads consultation document. This submission is from Consumer NZ, New Zealand's leading consumer organisation. It has an acknowledged and respected reputation for independence and fairness as a provider of impartial and comprehensive consumer information and advice.

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2. Answers to questions

Our answers to selected questions in the consultation document are set out below.

Question 1 – Do you agree with the Government's proposal to prohibit the manufacture and sale of personal care products containing microbeads (e.g. body scrubs, facial cleaners, toothpastes) to reduce their impacts on New Zealand's environment and human health? Why/why not?

Yes, subject to our comments below, we support the government's proposal to prohibit the manufacture and sale of personal care products containing microbeads. We are concerned about the impact of these microbeads on the environment and the potential impact on human health.

Question 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?

We support a broad definition of personal care products. We do not support a narrow definition or limiting the ban to "rinse off" products, like the United States.

In addition to a broad definition of personal care products, we think the ban should be extended to include any personal or domestic products that are washed down the drain or directly discharged into waterways or the marine environment. This would include cosmetics (for example, make up and nail polish), personal care products, and all household cleaning and washing products (for example, kitchen cleaners and washing

powders). We found microbeads in a household cleaning product we recently tested: Mr Muscle "Easy Gel" bathroom cleaner.

According to the United Nations Environment Programme¹, microbeads in personal care and cosmetic products represent a relatively small proportion of microplastics in the environment. Therefore, the government should consider increasing the scope of the ban on microbeads to include all personal and domestic products, in order to further reduce the impact of microplastics on the environment.

Question 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?

In our view, it would be preferable to have a shorter timeframe to minimise the impact of microbeads on the environment between now and when the regulations come into force.

Bans due to come into force overseas mean products containing microbeads may already have been largely removed from retail supply here by the time the proposed regulations come into force. This indicates a shorter timeframe would be possible.

Question 15 – Are there any ways the Government could help industry or consumers transition away from personal care products containing microbeads ahead of the regulations’ entry-into-force?

The government should ensure accurate and up to date information about the ban on microbeads is available on line so consumers are aware of the impact of microbeads on the environment and the reasons for the ban.

Thank you for the opportunity to make a submission on the microbeads consultation document. If you require any further information, please do not hesitate to contact me.

Yours sincerely



Aneleise Gawn
Consumer Advocate

¹United Nations Environment Programme, *Marine Plastics Debris and Microplastics Technical Report Advance Copy*, May 2016, Retrieved on 20 February from <http://www.unep.org/about/sgb/Portals/50153/UNEA/Marine%20Plastic%20Debris%20and%20Microplastic%20Technical%20Report%20Advance%20Copy.pdf>