

23 June 2014

Priority Waste Streams Consultation
Ministry for the Environment
PO Box 10362
Wellington 6143

By email: waste@mfe.govt.nz

**SUBMISSION on
Priority waste streams for product stewardship intervention**

Thank you for the opportunity to make a submission on the discussion document on priority waste streams for product stewardship intervention. 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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1. Question 1c

- 1.1 We agree that the four waste streams identified in the discussion document should be priorities for the government.
- 1.2 The main waste stream that we wish to comment on is electrical and electronic equipment (e-waste). The quantity of e-waste is constantly increasing and many electrical and electronic items do not last for long. Consumers do not currently have many options to safely dispose of e-waste.

2. Question 2a

- 2.1 Consumer NZ agrees with the declaration of electrical and electronic equipment as a priority product under the Waste Minimisation Act 2008 (WMA).
- 2.2 The issue of e-waste has been discussed for some time but there have been few developments since the introduction of the WMA. Consumer NZ believes the voluntary schemes have been ineffective and that the generally accepted view is a mandatory scheme is required for e-waste. Therefore, we support the introduction of regulations compelling participation in accredited e-waste product stewardship schemes.

3. Question 2c

- 3.1 Although the declaration of electrical and electronic equipment as priority products could ultimately result in higher purchase prices for the consumer, we support measures to reduce the dumping of e-waste in landfills and provide consumers with better options for the safe disposal of e-waste.
- 3.2 Currently, if a consumer disposes of e-waste at a landfill then the cost of disposal is met by the consumer alone. We do not think the consumer should be solely responsible for such costs. In our view, manufacturers and retailers should contribute towards the cost of recycling schemes for e-waste.

4. Question 2d

- 4.1 Consumer NZ supports a broad scope of declaration to include as much electrical and electronic equipment as possible. We do not agree the scope of the declaration should be limited to televisions and computers as these items only make up a small percentage of overall e-waste. However, if the government decides to adopt a narrow scope (similar to that adopted in Australia) then it should leave open the possibility of broadening the scope at a later date.

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

Yours sincerely



Sue Chetwin
Chief Executive