

The Packaging Forum

Submission to the Environment Select Committee

RE: Response to petition by Niamh Peren and 9,539 others for simple labels on food and drink packaging to indicate recyclability

Introduction

The Packaging Forum is New Zealand's leading member-based organisation representing the depth and breadth of the packaging industry, with more than 200 member brands. We have the vision that by 2025, all packaging in New Zealand will be reusable, recyclable or compostable.

We work together as an industry to ensure the best commercial and sustainable solutions are found. The Packaging Forum operates three government-accredited voluntary product stewardship schemes: the Glass Packaging Forum, Soft Plastic Recycling Scheme and the Public Place Recycling Scheme. It also has three Technical Advisory Groups; Fibre-based packaging, compostable packaging and recyclability labelling.

We would welcome the opportunity to speak in support of our submission before the Environment Committee.

Response to petition

The Packaging Forum commends Niamh Peren for her efforts to tackle packaging waste in New Zealand, and in that endeavour we are aligned.

However, we have a number of concerns with the proposed Thumbs Up New Zealand labelling as proposed by the petition.

While creating simple, easy to understand labelling for packaging is critical to tackling waste and improving recycling we feel the Thumbs Up New Zealand system is overly simplistic and doesn't take into account a range of issues and complexities involved in packaging recyclability.

Our main concerns, expanded on later in this submission are:

- No national standardised kerbside system, leading to different labelling requirements in different regions
- Packaging with multiple materials with different recycling requirements
- Packaging with highly recyclable materials, but for which there are limited markets, achieving two thumbs up, leading to "wish-cycling"
- Packaging with high recycled content such as glass or rPET do not achieve two green thumbs up, despite encouraging demand for recycled materials
- Thumbs up / down labelling is not recognised by our closest trading partners, who will require different labelling
- Only aimed at food and beverage packaging – we believe the focus for a standardised labelling system should encompass all packaging
- Pre-empting other work MfE is undertaking in regard to labelling



The Packaging Forum is committed to working with its members and government on a labelling solution that delivers the best information for consumers in the simplest way it can to be effective and is recognised trans-Tasman.

No standardised kerbside system

As noted by Ms Peren in her submission, while most of our food and beverage products are available across a national footprint of outlets and supermarkets, New Zealand currently has an assortment of kerbside collection systems in place for recycling with different acceptance criteria. As a result, what is accepted for recycling in one district may not (and often is not) accepted in others.

A labelling system of two green thumbs or one horizontal yellow thumb (indicating an item can be recycled in New Zealand) would therefore not provide enough information for consumers across multiple districts to make an informed decision when recycling their packaging. While the intent would be that items are recycled, this would lead to an increase in “wish-cycling” by contaminating material streams.

It is our understanding the Ministry for the Environment has a programme of work to address the national standardisation of kerbside collections in New Zealand, which we support.

The Thumbs Up New Zealand system will not address the issues needed for achieving a standardised system.

The Ministry is also currently engaged in a programme of work on standardising recyclability labelling in New Zealand, which we also support.

Complexities of packaging and recycling it

The simple Thumbs Up New Zealand labelling is hindered by the complexities of recycling. For example, container glass made in New Zealand contains a high recycled material content. This means it would only achieve a horizontal yellow thumb label, despite being a highly sustainable packaging material and an example of the circular economy at work. The same is true for both aluminum and tin.

Some fibre (paper and cardboard) is made of 100% recycled content, and there is onshore recycling infrastructure in place. However, this infrastructure is limited, and New Zealand sends some 250,000 tonnes of fibre offshore for recycling each year. As a result, some fibre packaging qualifies for a double green thumb label while some does not. Differentiating between them would be impossible as there is no way to guarantee any one piece of fibre packaging will end up in a recycling stream which sees it recycled onshore.

The same issue applies to plastic, which has limited onshore recycling infrastructure in place. It is also important to note achieving 100% recycled content for plastic production is impossible in many applications without additives that are not recycled content.

Labelling material which has some (be it limited) onshore processing with a double green thumb, but for which there is no guarantee it will be recycle onshore, would be tantamount to greenwashing.

Perverse outcomes

While well-intentioned there are possible perverse outcomes to consider with the Thumbs Up New Zealand labelling system.

As we have established almost no packaging would qualify for the Two Green Thumbs Up label. The simplistic nature of the labelling system would also create an overly simplified 'black and white' view of recycling, when the reality is far more complex.

We believe this would have a negative impact on the public perception of recycling in New Zealand and would dissuade the public from making the effort to support brands whose packaging is either highly recycled or has a high recycled content.

Using the Thumbs Up New Zealand labelling system would also be confusing for consumers when dealing with multi-layer packaging. For example, a meat tray made up of the PET tray, plastic film and soak pad would require different labelling for each component. As a result, recyclable material could easily end up going to landfill.

In addition to this, many of our food and beverage products are exported from and imported into other countries and as such are labelled in the country of origin.

Space for labelling on food and beverage items is at a premium. Many food and beverage companies which already operate trans-Tasman are investing in an existing recycling labelling system that is recognised in Australia. This system works hand-in-hand with a platform that informs designers and manufacturers of packaging recyclability. It takes into account not just materials used, but how accessible recycling solutions are for that material and makes recommendations for material changes to increase recyclability.

The use of this platform and labelling approach in New Zealand is supported by The Packaging Forum.

Conclusion

We once again commend Ms Peren's commitment to tackling packaging waste in New Zealand. It is the primary goal of The Packaging Forum.

However, we believe this labelling system – however engaging in design and simplicity – is not the correct solution. Recycling is a complex issue, and while we also believe it should be as simple for the public as possible, a more robust and informative national standard is required.

Such a system would have to take into account the issues of non-standardised kerbside collections, multi-layered packaging, limited onshore recycling infrastructure, the complexities of producing packaging from recycled material and the need for overseas visitors to be able to easily understand it (have universal similarities with other countries).

The Packaging Forum and its members are committed to working with the Ministry for the Environment in developing solutions for packaging waste.