



Summary of Submissions

Proposed Product Stewardship Regulations

Agrichemicals, Their Containers, and Farm Plastics



Ministry for the
Environment
Manatū Mo Te Taiao



Te Kāwanatanga o Aotearoa
New Zealand Government

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Executive summary

From 31 March to 2 June 2025, the Ministry for the Environment (the Ministry) consulted on proposed product stewardship regulations – under the Waste Minimisation Act 2008 – for agrichemicals, their containers and farm plastics.

The proposed regulations would:

- prohibit the sale of agrichemicals in specified container types and certain farm plastics, except in accordance with the accredited product stewardship scheme for these products
- require all producers and importers placing in-scope products on the New Zealand market to pay a stewardship fee to cover end-of-life management of the products
- require the product stewardship organisation (PSO) to provide a take-back service for in-scope products
- enable the Ministry to use a small part of the stewardship fee revenue to cover the Ministry's cost of monitoring the scheme's performance.

We received 144 submissions from a range of stakeholders, including:

- farmers and growers
- rural contractors
- in-scope product producers and brand owners
- industry bodies
- councils
- waste management service providers
- retailers
- civil society organisations.

This report summarises the views expressed in those submissions.

The report does not make recommendations on the basis of the submissions. Any recommendations will be made through policy advice to the Minister for the Environment.

Key findings

A clear majority of submitters were in support of the regulatory proposals. Table 1 sets out the consultation questions that invited feedback with yes and no response options. The number of respondents and the percentage of those answering 'yes' to these questions is included below.

Table 1: Percentage of submissions supporting the proposals

Consultation question (and number of respondents)	'Yes' answers (percentage of those answering the question)
Do you agree with the description of the problem posed by agrichemicals, their containers, and farm plastics? (<i>n</i> = 129)	90%
Do you support the scheme name <i>Green-farms</i> ? (<i>n</i> = 114)	52%
Do you agree the options presented (<i>Option 1 – Introduce WMA regulations; Option 2 – No action</i>) are the appropriate ones to consider? (<i>n</i> = 122)	90%
Do you support a national take-back and recycling scheme for agrichemicals, their containers, and farm plastics? (<i>n</i> = 123)	89%
Do you support the proposal to only allow sale of the following products in accordance with an accredited product stewardship scheme?	
<ul style="list-style-type: none"> Agrichemicals sold in containers and drums of 1,000 litres or less (including household pest and weed control products) (<i>n</i> = 124) 	82%
<ul style="list-style-type: none"> Plastic bale wrap and silage sheet (<i>n</i> = 127) 	89%
<ul style="list-style-type: none"> Small plastic bags (40 kilograms or less when full) containing products such as seed, feed, fertiliser, soil and crop inputs, farm and animal supplements (<i>n</i> = 123) 	80%
<ul style="list-style-type: none"> Bulk woven polypropylene bags (over 40 kilograms when full) containing products such as seed, feed, fertiliser, soil amendments, minerals and bulk nutrition (<i>n</i> = 124) 	85%
Do you support the proposal to set a product stewardship fee on the following imported or domestically manufactured products, to cover their end-of-life management?	
<ul style="list-style-type: none"> Agrichemicals sold in containers and drums of 1,000 litres or less (including household pest and weed control products) (<i>n</i> = 123) 	84%
<ul style="list-style-type: none"> Plastic bale wrap and silage sheet (<i>n</i> = 126) 	87%
<ul style="list-style-type: none"> Small plastic bags (40 kilograms or less when full) containing products such as seed, feed, fertiliser, soil and crop inputs, farm and animal supplements (<i>n</i> = 123) 	80%
<ul style="list-style-type: none"> Bulk woven polypropylene bags (over 40 kilograms when full) containing products such as seed, feed, fertiliser, soil amendments, minerals and bulk nutrition (<i>n</i> = 124) 	84%
Do you think that any particular products in the four proposed categories should be exempt from regulation? (<i>n</i> = 118)	23% ¹
Do you support the inclusion of these products in a regulated product stewardship scheme in future, subject to further government consideration?	
<ul style="list-style-type: none"> Irrigation piping (<i>n</i> = 110) 	83%
<ul style="list-style-type: none"> Shrink/pallet wrap (<i>n</i> = 116) 	87%
<ul style="list-style-type: none"> Tunnel house covers (<i>n</i> = 111) 	87%
<ul style="list-style-type: none"> Wool fadges (<i>n</i> = 108) 	83%
<ul style="list-style-type: none"> Potted plant pots (<i>n</i> = 108) 	86%
<ul style="list-style-type: none"> Vineyard netting (<i>n</i> = 106) 	89%

¹ Percentage represents the number of submitters who responded 'yes' to the question. Most provided specific examples, such as one or all four product types proposed for regulation, or products that are imported to New Zealand then exported again without being used in the New Zealand market.

Consultation question (and number of respondents)	'Yes' answers (percentage of those answering the question)
<ul style="list-style-type: none"> Hail netting and other coverings (<i>n</i> = 106) Other agricultural plastic products (<i>n</i> = 92) 	88%
Do you support the proposal to require the product stewardship organisation to provide a take-back service for in-scope products, and to prescribe requirements for that service? (<i>n</i> = 124)	77%
Do you support the proposal that the Ministry will charge the accredited scheme to recover the costs of monitoring the performance of the scheme? (<i>n</i> = 122)	91%
Do you agree with the description of the expected impacts of Option 1: <i>Introduce WMA regulations?</i> (<i>n</i> = 118)	68%
Do you agree with the description of the expected impacts of Option 2: <i>No action (maintain the voluntary approach)?</i> (<i>n</i> = 111)	86%
	80%

Submissions also included feedback on the following.

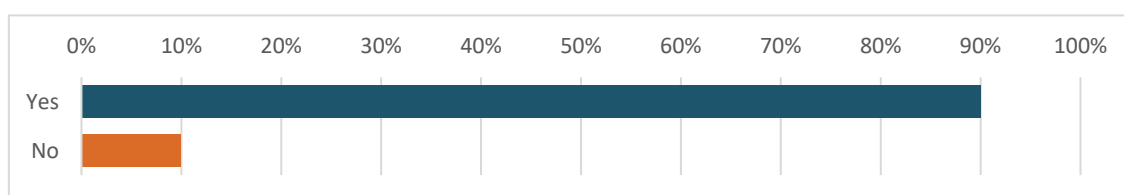
- Scheme scope: a few submitters (mostly from the retail sector) did not support the inclusion of products intended for household use (ie, household pest and weed control product containers and small bags of up to 40 kilograms (kg) when full). Some councils believed the regulated scheme fees should also provide for legacy agrichemical management.
- Scheme governance: a few submitters mentioned the need for measures to ensure appropriate management of commercially sensitive information by the PSO, and mechanisms for stakeholder consultation and input into scheme governance.
- Take-back model: a few submitters expressed a preference for on-farm collection of farm plastics, rather than the proposed drop-off system.
- Complementary policies: a range of other policies were suggested to increase the scheme's effectiveness, such as a nationwide ban on burning and burying farm plastics, encouraging product reuse and reducing waste at source, supporting the development of onshore processing capacity, and education and communication to encourage uptake of scheme services.

What we heard

Problem description

We asked the public whether they agreed with the description of the problem posed by agrichemicals, their containers and farm plastics presented in the discussion document. There were 129 responses to this question. The majority (90 per cent, see figure 1) of those who answered the question agreed with the problem description.

Figure 1: Responses to Question 1: Do you agree with the description of the problem posed by agrichemicals, their containers, and farm plastics? (n = 129)



Comments and suggestions

Confirmation of the problem

Most of the submitters who agreed with the problem description and provided comments expressed their general agreement or confirmed the problem based on their experience. For example:

Current on-farm disposal practices, such as burying or burning waste, lack oversight and are inconsistently regulated across regions. These practices pose significant risks to environmental and human health. Access to voluntary takeback or recycling schemes also varies widely, and when they are not accessible or cost-effective, there is little incentive for farmers and others who live rurally, to use them responsibly. These issues underline the need for a regulated, and enforceable national approach. (Otago councils²)

The consultation document accurately identifies the environmental and operational risks associated with unmanaged agrichemical containers and farm plastics, including pollution, health hazards, and the inadequacy of current voluntary schemes to achieve national coverage and compliance. International experience and local evidence both highlight the need for a regulated, nationwide approach to address free-riding and ensure all producers contribute to end-of-life management. (Manawatū District Council)

Waikato-Tainui agree with the description of the problem as outlined in the discussion document. The lack of widespread access to take-back and recycling services for agrichemicals, their containers, and farm plastics continues to result in avoidable and harmful practices such as burning, burying, or indefinite storage. These practices pose risks to the environment, human health, and the mana of our whenua and wai. They also represent a loss of valuable materials that could be recovered and reused. (Te Whakakitenga o Waikato Incorporated)

² Clutha District, Central Otago, Waitaki District, Queenstown Lakes District, Dunedin City and Otago Regional Council.

The products covered by the scheme could, if not handled correctly, have a significant negative impact on the environment and on people's health. Recycling and ensuring the safe handling of agrichemical containers, bale wrap and other plastic bags used for seed and fertiliser is supported and encouraged. (DairyNZ)

Reasons for disagreeing with the problem description

The main themes raised by submitters who disagreed with the problem description are summarised below.

Incomplete characterisation of the agrichemicals problem

Hastings District Council noted the discussion document lacked a clear definition of what constitutes 'residual' agrichemicals. (See also [Cross-cutting issues and other feedback](#).) The council also noted that stored waste agrichemicals do not only enter the environment via perished containers or natural disasters, but also when safe recovery and disposal options are not easily accessible, due to location, frequency or user-pays fees. In addition,

[T]he description of the problem does not include an analysis of incorrect disposal of unwanted or expired household weed and pest control chemicals where household weed and pest control products can be incorrectly disposed of into drains and waterways through a lack of understanding of the potential harm.

Hastings District Council also noted legacy and orphaned agrichemicals may still be present in large volumes on farms:

We understand that the amount of chemicals registered for The Great DDT Muster well outstripped expectations and there is potential for there to be greater volumes of legacy and orphaned chemicals stored on farm than expected for a number of reasons such as changes of ownership, hesitancy to report stockpiles of banned chemicals, etc.

A farmer/grower and recycler noted that part of the problem is packaging size and overbuying, leading to surplus chemicals on farms:

I believe greater responsibility should rest with manufacturers and suppliers to ensure more accurate supply of chemicals. For example, when spraying crops such as fodder beet, a farmer may only need 4 litres of a pre-emergent spray, yet the product is only available in 5-litre containers. If fodder beet is not planted the following season, that remaining litre often sits unused and eventually becomes a disposal issue. This issue is compounded when chemical representatives place orders for the following season without checking what is already in stock on-farm. Over time, this leads to the accumulation of surplus or expired chemicals, which farmers are left to manage without sufficient support. Addressing this challenge requires a more collaborative approach between manufacturers, suppliers, and scheme managers to reduce unnecessary waste at the source—and to ensure practical, funded solutions are in place for safe disposal when it does occur.

Many farm plastics are reused

Two submitters (farmers/growers) thought the discussion document failed to consider that many plastic products are reused or repurposed on farms.

Free-to-use drop-off system will not disincentivise inappropriate disposal

Two submitters (from the same rural contracting company) disagreed that provision of free-to-use drop-off sites would reduce the burning and burying of farm plastics. Even if the take-back service were paid for in advance, burning, burying or using a skip that gets picked up for landfill would still be perceived as more convenient. (See also [Cross-cutting issues and other feedback](#).)

Those who currently burn or bury their plastics are typically not willing to transport them to a collection point. For many, this simply represents another task in an already demanding schedule (...) Agricultural plastic waste cannot simply be placed in the boot of a car and conveniently dropped off en route to work. On-farm recycling requires considerable strategic planning, coordination, and cost.

Farmer engagement has not plateaued

These two submitters also disagreed that farmer participation in voluntary schemes has plateaued. In their experience as collectors for Plasback in Southland, new clients are signing up for on-farm collection services every week.

The market is driving an uptake of recycling

One of the two submitters above also noted that demand for sustainable practices is already driving participation in recycling initiatives:

Currently, I work with customers who actively choose to purchase from seed and feed merchants participating in recycling schemes, specifically so they can responsibly recycle their feed bags. This demonstrates a growing demand for sustainable practices and shows how customer preferences are increasingly influencing purchasing decisions.

While I understand the intent behind introducing a scheme to create a level playing field, I believe the market itself is already driving this change. As more farmers prioritize sustainability, suppliers who support recycling initiatives are naturally gaining a competitive advantage. In this way, the market is organically encouraging broader participation and accountability.

Additional aspects to consider in analysing the problem

Costs to councils

Napier City Council and Hastings District Council noted that the costs to safely destroy agrichemicals that cannot be used legally for their intended purpose are generally borne by local councils, with little to no producer input.

Low value of recycled plastic

A producer/brand owner of in-scope products mentioned part of the reason for inappropriate disposal is the lack of value in the packaging at end of life.

Increasing demand for the packaging once the product is used would increase provision of recovery services and demand they be rolled out more widely.

Volatility of recycling markets

Waikato Regional Council noted that “recycling is subject to market volatility, so a complementary suite of legislation should be rolled out which incentivises not just the capture of plastics, but incentivises reusable systems or products that do not require further processing”.

Urban dimension

Plastics New Zealand considered the description underrepresented the role of urban and semi-urban use of household agrichemicals and associated packaging (eg, garden centre products, pet food, compost).

The current voluntary schemes focus heavily on rural users, but the environmental risks of urban leakage are significant and growing.

Climate impact

A submitter noted the climate change impact of burning plastics (ie, carbon dioxide emissions) should be considered in the impact analysis.

Transport costs

A farmer/grower suggested we consider the additional cost of transporting products to a collection point.

Improving voluntary schemes

A farmer/grower noted that current collection services are poor in their area and suggested looking at how the current voluntary schemes could be improved:

If the present schemes have plateaued, rather than look at increased cost and regulation, we could consider how the current schemes could be enhanced.

Local processing capacity

A producer/brand owner of in-scope products asked whether the scheme understands demand for recycled plastics, and whether it would invest in local capability to produce products with collected materials, rather than exporting those materials.

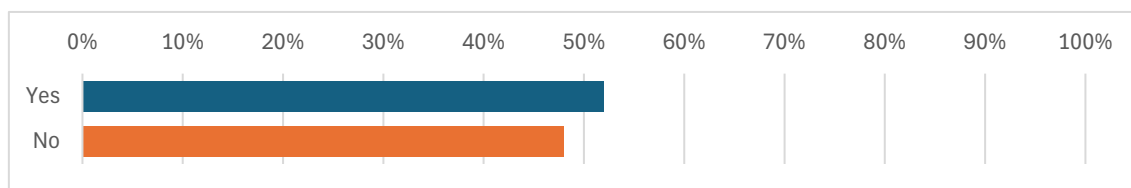
Manawatū District Council also noted we should consider “information on the current and projected capacity for domestic processing of farm plastics, and risks associated with reliance on offshore processing”.

Scheme name

In line with its accreditation, the new scheme’s provisional name is Green-farms. We asked the public whether they supported this name. There were 114 responses to this question. About half (52 per cent) of those who answered the question supported the name (see figure 2).

However, many of the submitters who did not support the name considered ‘Green-farms’ bordered on greenwashing, and submitters noted it does not convey what the scheme is actually about. Others pointed out the inclusion of ‘farms’ in the name excludes other intended users of the scheme, such as lifestyle blocks.

Figure 2: Responses to Question 3: Do you support the scheme name *Green-farms*? (n = 114)



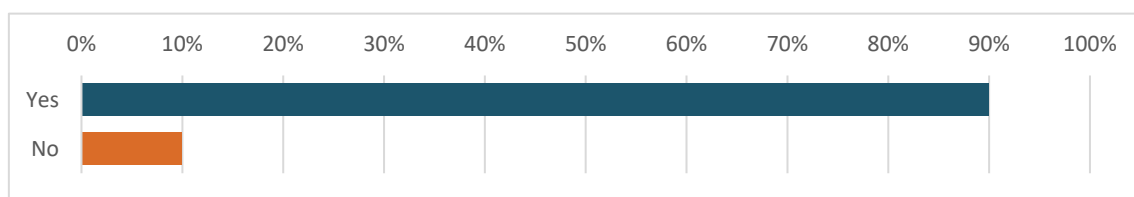
Alternative scheme names suggested by submitters include:

- Agrecovery
- Agrecovery Certified
- Agricultural waste management scheme
- AgriCycle: Farm Plastic Stewardship
- Agriloop
- Compulsory Farm Plastic Recycling
- Farm Back
- Farm Plastics and Agrichemical Recycling Scheme
- Farm Plastics Product Stewardship Scheme
- Farm Waste Management
- Farm-cycle
- FarmSmart
- FarmWise
- GreenPlastics
- Growcycle
- Mastering Farm Waste
- NZ Clean-farms
- Recyclable Plastics Product Stewardship Scheme
- Recycle to grow
- Rural Reclaim
- Smarter Farm Waste
- Waste-Wise Farms.

Options considered

We asked the public whether they agreed the two options presented (Option 1 – Introduce WMA regulations; Option 2 – No action) were the appropriate ones to consider. There were 122 responses to this question. The majority (90 per cent) of those who answered this question agreed with the two options presented for consultation (see figure 3).

Figure 3: Responses to Question 4: *Do you agree the options presented (Option 1 – Introduce WMA regulations; Option 2 – No action) are the appropriate ones to consider?* (n = 122)



Comments and suggestions

Of those who provided comments, four³ stated that they agreed with the two options being regulations or no action, but did not support the product scope as presented. The Packaging Forum, New Zealand Food and Grocery Council and a retailer/brand owner did not support the inclusion of products mainly intended for household rather than agricultural use. Synlait did not support the inclusion of agrichemical containers.

Hastings District Council and Napier City Council stated they agreed, but supported a wider range of farm plastic waste streams being introduced in a faster timeframe than proposed.

Otago councils⁴ stated they were unsure, noting the scope should be broader:

While Option 1 is a step in the right direction, the scope of options considered should be broader to address the full scale of the problem. Introducing regulations under the Waste Minimisation Act (WMA) is appropriate. However, excluding measures like a national-level ban on on-farm disposal of agrichemical containers and plastics, the proposal lacks a key policy. Continuing to allow burning and burying waste rurally, undermines the intent of this proposed stewardship scheme.

Another concern is that the scheme is not mandatory for users, which risks undermining its effectiveness. Mismanagement of agrichemical containers and plastics is the key issue this scheme seeks to address, and without either regulation or strong incentives to ensure participation, the scheme may fall short of its goals. The current model places cost responsibility at the beginning of the supply chain, but without strong uptake with end users, there's a risk that the required return rates won't be met, likely to affect both environmental outcomes and financial viability.

A producer/brand owner who answered 'no' considered the scheme should not be mandatory.

A farmer/grower who answered 'no' suggested adjustments to the regulatory option, particularly to allow for on-farm collection:

Perhaps there is an option similar to Option 1 but with some alterations to make it more appealing to farmers, and more achievable. There also needs to be more detail provided, there are some aspects which are not clear enough. The idea of drop off points/take back has been proven to not work as presently seen with drench drums and chemical containers. However, on farm collection of baleage wrap, containers etc would be far more appealing to farmers who are incredibly busy but willing to play their part in the process if simple and easy.

³ Three of these submitters answered 'yes' and one 'no'.

⁴ Clutha District, Central Otago, Waitaki District, Queenstown Lakes District, Dunedin City and Otago Regional Council.

On-farm collection was also suggested by a farmer/grower and rural contractor who answered ‘yes’:

Agree that the product needs to be better managed, however logistically it would be better to offer farm gate collection. Imagine if all households were responsible for taking their waste to the local refuse centre? Gate collection works well.

A farmer/grower who answered ‘no’ mentioned waste-to-energy options should be considered.

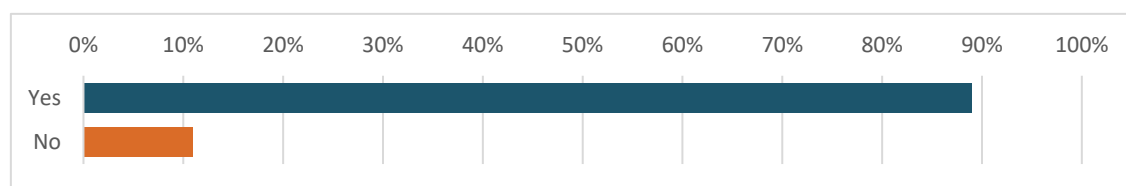
National take-back and recycling scheme

We asked the public whether they supported a national take-back and recycling scheme for agrichemicals, their containers and farm plastics. There was strong support for a national scheme; 89 per cent of the 123 submitters who answered the question said ‘yes’ (see figure 4).

Support was high among farmers/growers (83 per cent of those answering the question said ‘yes’).

Key industry organisations supporting a national scheme include: DairyNZ, Horticulture New Zealand, New Zealand Winegrowers, Bayer, Farmlands and PGG Wrightson.

Figure 4: Responses to Question 5: *Do you support a national take-back and recycling scheme for agrichemicals, their containers, and farm plastics?* (n = 123)



In addition, five submitters⁵ who did not use the consultation template (including Federated Farmers) stated they supported the proposed regulations, which also implies support for a national take-back and recycling scheme.

Comments and suggestions

Support a national ‘product stewardship scheme’

Two submitters that answered ‘no’ (Hastings District Council and Napier City Council) and one that did not answer the question (Otago councils⁶) clarified in comments that they were supportive of a national ‘product stewardship scheme’ for these products, which they understood to be broader than a ‘take-back and recycling scheme’.

We do not support a national take-back and recycling scheme however we do support a national product stewardship scheme for agrichemicals, their containers, and all farm plastics. The Waste Minimisation Act 2008, section 8 defines product stewardship as a

⁵ Animal and Plant Health Association New Zealand, Federated Farmers, Federation of Business and Professional Women New Zealand, Parliamentary Commissioner for the Environment, Te Whakakitenga o Waikato.

⁶ Clutha District, Central Otago, Waitaki District, Queenstown Lakes District, Dunedin City and Otago Regional Council.

system to: ‘encourage (and, in certain circumstances, require) the people and organisations involved in the life of a product to share responsibility for—

- (a) ensuring there is effective reduction, reuse, recycling, or recovery of the product; and
- (b) managing any environmental harm arising from the product when it becomes waste.’

We note that the proposed regulations could be limiting the degree of responsibility to be taken by those responsible for product stewardship of farm plastics, that is producers, importers, retailers and consumers, by referring to the proposed regulations as ‘a form of product stewardship’. (Hastings District Council)

Support only for some products

Eight submitters⁷ commented that they supported the proposed take-back and recycling scheme only for a reduced product scope.

- The Packaging Forum, New Zealand Food and Grocery Council, Retail NZ and two retailers did not support the inclusion of products intended for household use (ie, household pest and weed control product containers and small bags). In their view, this risks duplication with the proposed Plastic Packaging Product Stewardship scheme or kerbside recycling. These submissions are discussed in more detail in the section [Cross-cutting issues and other feedback](#).
- An industry body (Synlait) was only supportive of a scheme for farm plastics, and not for agrichemicals and their containers, “due to the existing Agrecovery scheme already being free and effective”.
- An individual farmer/grower supported a scheme only for agrichemicals and their containers. Another agreed “for chemicals not wrap” and questioned why these product categories were considered together when they present “quite different risks and potential solutions”.

Support only if there is demand for collected materials

A producer/brand owner of in-scope products who answered ‘no’ clarified in comments that they would support a compulsory scheme provided that there is demand for the collected materials.

While we agree in principle, there should be exceptions on the coverage of the scheme where it is not economically viable.

Furthermore, a compulsory scheme should only be implemented if there is a guaranteed outlet for the collected waste material. If the existing recipient of the waste plastic doesn’t want it anymore, where will the waste go? If this is just an expensive exercise to collect mountains of waste plastic for storage somewhere, it isn’t solving any problem.

For the scheme to operate effectively in the long-term, there must be local outlets for the collected material developed, so as not to rely completely on shipping significant quantities of plastic waste to developing nations.

⁷ Of which three answered ‘no’, two ‘yes’, and three did not answer the yes/no question.

Accessibility and cost to farmers

Accessibility and costs were mentioned in several submissions. For example:

Access to the service will be critical to its success, especially considering that many stakeholders are in rural areas, with often large travel times. While there is currently good access to take back for agrichemical containers, this isn't the case for residual unused/unwanted/expired agrichemicals. (3R Group)

We support establishing requirements for collection network coverage and adequacy of locations, as accessibility and convenience are key drivers for greater uptake by our members. (New Zealand Winegrowers)

Two submitters (DairyNZ and an individual) mentioned that regional differences should be taken into account when designing the take-back services.

Five submitters⁸ (one who answered 'no' and four who answered 'yes') expressed a preference for on-farm collection of farm plastics (rather than the proposed drop-off system). Among the reasons for this preference, submitters were of the view that the drop-off model is more costly and less convenient for farmers, and makes it harder to avoid contamination (ie, users dropping off out-of-scope or insufficiently cleaned products).

Plastics New Zealand expressed support "provided the scheme is designed to reflect the diverse needs and logistics of both rural and urban users, and the cost structures are equitable".

A farmer/grower expressed support "provided it's free and not another tax on farmers".

Other farmers/growers commented:

We support the ideas of the scheme, we just would like to see that the scheme does not sting farmers too much and that it is made financially and practically accessible to all involved.

There does need to be a scheme in order to make this happen, however the scheme needs to be fair, affordable and practical. As farmers we are happy to collect up agrichemicals, containers and farm plastics in special bins on farms; we then appreciate having these emptied and taken away for recycling. The costs however must not become more than it costs to have a skip on farm which can be emptied - it shouldn't be cheaper to send products to landfill than it is to have them recycled otherwise where is the incentive other than good will and a conscience... farming is a hard enough industry to survive in without high costs to do the right thing.

DairyNZ stated support for the regulatory proposals (Option 1), noting:

Our support is conditional on ensuring that the implementation of the scheme is practical, affordable, and delivers meaningful outcomes without placing undue burden on farmers. To ensure this, we propose that a formal review process is built into the scheme to assess whether it is achieving its intended outcomes and to evaluate the full range of costs and benefits for farmers, industry, and government alike.

Ōtorohanga District Council, Waimakariri District Council and a farmer/grower noted the scheme should also be accessible to lifestyle-block owners.

⁸ All five submitters identified as farmers/growers. Additionally, three also identified as rural contractors, two as transport industry, three as recyclers and one as industry body (producers and/or supply chain for in-scope products).

Other comments

A submitter (farmer/grower and recycler) noted that:

- recovery hubs should be owned and operated by local stakeholders
- exports of collected plastics for recycling should not be restricted; “if a better price can be secured in overseas markets, there should be no obligation for farmers to subsidise local processing simply for the sake of keeping the product in New Zealand”
- integrating recycling requirements into farmers’ audits and consenting processes would incentivise farmers to participate in the scheme.

A farmer/grower suggested a deposit-return system; buyers would pay a small levy on plastic containers, which would be reimbursed upon return of the container.

Another farmer/grower suggested a licensed recycling scheme where farmers can choose their preferred recycler.

Manawātū District Council mentioned the need for clear and consistent communication, including on-product labelling, and urged the Ministry for the Environment (the Ministry) to “invest in domestic recycling infrastructure, consider the future integration of bulk agrichemical disposal, and maintain ongoing engagement with councils and the rural sector to ensure the scheme remains effective and equitable”.

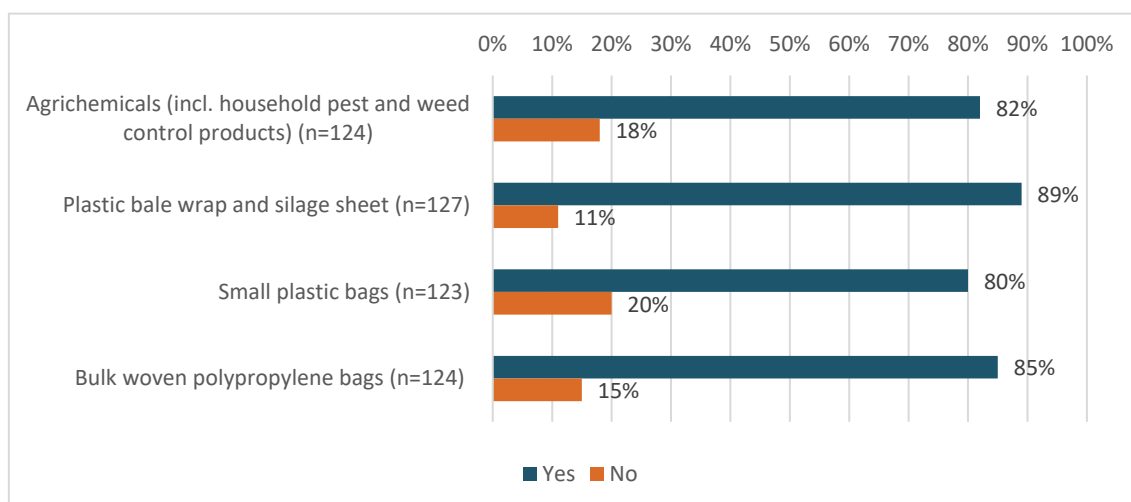
Sale in accordance with a product stewardship scheme

We asked the public whether they supported the proposal to only allow sale of in-scope products in accordance with an accredited product stewardship scheme. The majority of submissions supported this proposal for each product group (see figure 5).

Most farmers/growers who answered this question were also supportive (79 per cent for agrichemicals, 80 per cent for bale wrap and silage sheet and 77 per cent for small bags and bulk bags).

Key industry organisations supporting the proposal (for all four product categories) include: Horticulture New Zealand, New Zealand Plant Producers Incorporated, Bayer, Farmlands, PGG Wrightson and Plastics New Zealand.

Figure 5: Responses to Question 6: *Do you support the proposal to only allow sale of the following products in accordance with an accredited product stewardship scheme?*



In addition to the statistics above, which only capture explicit yes/no answers in the consultation survey, Federated Farmers stated in their submission that they supported the introduction of regulations applying to the sale of these four product groups. Four other submissions,⁹ which did not use the consultation template, stated they supported the proposed regulations, which also implies support for the obligation to sell in accordance with a scheme.

One submission (from a retailer), which did not use the consultation template, expressed disagreement with the proposed regulations, which also implies lack of support for the obligation to sell in accordance with a scheme.

Comments and suggestions

Product scope

Six submitters¹⁰ expressed concerns about the inclusion of products intended for use in households rather than on farms, and the potential overlap with the proposed Plastic Packaging Product Stewardship scheme. These submissions noted similar concerns in response to other consultation questions and are discussed in more detail in the section [Cross-cutting issues and other feedback](#).

One submitter (producer/brand owner) believed the scheme “should only capture agricultural products supplied for use direct on farm, not as a component for further processing or blending”.

Three submitters suggested the inclusion of larger-sized products should be considered. Otago councils encouraged the inclusion of intermediate bulk containers of 1,000 litres or more, noting these would be suitable for refilling and reuse rather than recycling. Two individual submitters noted:

Consideration needs to be given to larger sized loads to reduce the chance of industry just upsizing to reduce the regulations. Perhaps the levy should be imposed on all sales of these products with takeback only initially available on the product sizes above.

⁹ Animal and Plant Health Association New Zealand, Federation of Business and Professional Women New Zealand, Parliamentary Commissioner for the Environment, Te Whakakitenga o Waikato.

¹⁰ Foodstuffs NZ, The Packaging Forum, New Zealand Food and Grocery Council, Retail NZ and two retailers.

I think that bigger containers (above 1000L) are harder to store empty and harder to dump or burn. Farmers and orchardists and growers using big quantities are potentially more likely to want to get rid of these large containers through recycling, especially if they have on-farm collections, than dispose of them in inappropriate ways, which can be done with <1000L.

Four submitters¹¹ called for the inclusion of like-products (pallet wrap, net replacement film and greenhouse film), to prevent producers from incorrectly declaring their products to avoid the stewardship fee.

Another submission highlighted building film as another like-product that can be used as a sub-par substitute for bale wrap and silage sheet. They noted regulations should be designed such that they prevent suppliers, retailers and farmers from exploiting workarounds to avoid the stewardship fee, or (as a better solution) create similar product stewardship schemes for building waste and waste from other sectors to ensure all similar plastics are treated equally.

Prioritising reuse where feasible

An industry body noted the scheme should also allow for reuse:

For products where this is a viable option (due to the distance in the supply chain) they should not be penalised for prioritising this option. (Marlborough Circular Wine Group)

Labelling

A submitter recommended considering a labelling system:

Careful consideration will need to be given to identifying what is and isn't covered by the scheme and how this identification is done. A labelling system, which makes it clear and easy to understand, including how to recycle the product, is an option which should be investigated. (3R Group)

Reasons for not supporting the proposal

Among the reasons for answering 'no' for all or some products, submitters expressed concerns that the proposal would:

- mandate a specific type of packaging for certain products¹²
- lead to monopoly control
- increase costs to farmers
- not be practical because "silage wrap and woven bags are really hard to keep clean and in a tidy enough bundle/area to recycle".

¹¹ Plasback, Tama Group Oceania and two producers/brand owners of bale wrap or silage sheet.

¹² This appears to be based on a misunderstanding; the proposed regulations would not mandate a type of packaging. For example, the scheme would collect all plastic bags of the specified sizes and uses, even if they are non-recyclable. Non-recyclable items would then be sent to landfill rather than recycling.

Changes that could increase support for the proposal

We also asked respondents what changes we could make to the proposal to gain their support, in cases where they answered 'no' for any of the product categories. Responses to this question mentioned:

- on-farm collection (rather than drop-off)
- exempting agrichemical containers from the fee
- excluding non-hazardous product unless in bulk bags
- excluding products intended for household rather than agricultural use
- further discussions as to possible exceptions for special circumstances
- ensuring there is no monopoly control.

Product stewardship fee

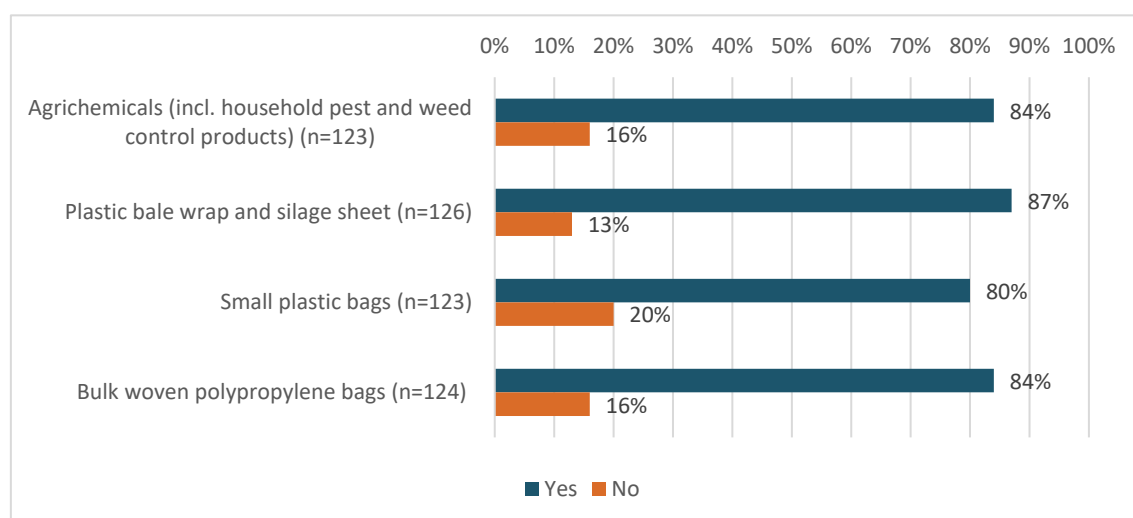
We asked the public whether they supported the proposal to set a product stewardship fee on imported or domestically manufactured in-scope products, to cover their end-of-life management.

The majority of submissions supported this proposal, with 84 per cent of those who answered the question saying 'yes' for agrichemicals, 87 per cent for bale wrap and silage sheet, 80 per cent for small plastic bags and 84 per cent for bulk bags (see figure 6).

Most farmers/growers who answered this question were supportive (80 per cent for agrichemicals, 78 per cent for bale wrap and silage sheet, 76 per cent for small bags and 77 per cent for bulk bags).

Key industry organisations supporting the proposal (for all four product categories) include: Horticulture New Zealand, New Zealand Plant Producers Incorporated, Bayer, Farmlands, PGG Wrightson and Plastics New Zealand.

Figure 6: Responses to Question 7: *Do you support the proposal to set a product stewardship fee on the following imported or domestically manufactured products, to cover their end-of-life management?*



In addition to the statistics above, which only capture explicit yes/no answers in the consultation survey, Federated Farmers stated in its submission that it supported the setting of a product stewardship fee on the four product groups. Four other submissions,¹³ which did not use the consultation template, stated they supported the proposed regulations, which also implies support for a product stewardship fee.

One submission (from a retailer), which did not use the consultation template, expressed disagreement with the proposed regulations, which also implies lack of support for the fee.

Comments and suggestions

Transparency regarding fee calculation

A submitter¹⁴ asked for transparency around fee setting to ensure that the PSO is operating on a cost-recovery basis only and that there is no cross-subsidisation between regulated products. They noted that, because the PSO will be a monopoly provider, there is a risk that the lack of competitive pressure will remove incentives for cost containment with the PSO. They therefore recommend that future fee changes must be transparent and thoroughly interrogated by the Ministry, and that measures must be taken to avoid unnecessary increases in the PSO's costs.

Fee levels

Some submitters who answered 'yes' commented that the fees are reasonable:

The rates specified in the discussion document appear to us to be reasonable given the negligible cost impact such fees represent as a proportion of the value of levied product.
(Federated Farmers)

The fees appear to be very reasonable and are likely to go down as the scheme is embedded and efficiencies improve. (Farmer/grower)

The proposed fee structure appears fair and proportionate, especially given the environmental gains that would result from improved product stewardship.
(Te Whakakitenga o Waikato Incorporated)

The WasteMINZ Product Stewardship Sector Group indicated support for the fee as long as "it is sufficient to cover all costs associated with the running of the product stewardship scheme, including but not limited to costs from advertising, transport, cleaning, recycling, disposal, monitoring, compliance, reporting, and sales". Similarly, two individual submitters noted the fee should cover the full end-of-life management costs.

Plasback, the Tama Group Oceania and a farmer/grower, who is also a collector for Plasback, raised concerns that the proposed fee for bale wrap and silage sheet (\$462 per tonne) is too low to cover the actual cost of recovery and processing. Plasback and the Tama Group Oceania indicated that the fee should be set at \$800 to \$1,000 per tonne.

Whanganui District Council and a rural contractor questioned whether the proposed agrichemical fees were sufficient.

¹³ Animal and Plant Health Association New Zealand, Federation of Business and Professional Women New Zealand, Parliamentary Commissioner for the Environment, Te Whakakitenga o Waikato.

¹⁴ Identifying as farmer/grower, producer/brand owner and rural contractor.

The fees quoted for the chemical handling and disposal seems on the light side from our experience in handling and disposing of these types of chemicals.
(Whanganui District Council)

A submitter (producer/brand owner and recycler) questioned how the fee for chemicals was calculated, because it appears that concentrated products would attract a higher fee.

Seed and Grain New Zealand and the New Zealand Seed Processors Association believed the proposed fees for small and bulk bags were too high. They noted the fee would represent a significant proportion of the packaging unit cost for some products.

Foodstuffs NZ indicated it did not support a fee per product and recommended instead a fee by volume placed on the market, which it considered a more equitable way of calculating costs for producers. Plastics New Zealand also noted concerns about the proposed per-unit fees for bags under 40 kg, which, according to its analysis, “results in extreme cost disparities on a tonnage basis for smaller packaging formats which may be more recyclable than other types”.

Fair cost-sharing

A farmer/grower noted the cost should be fairly shared among all parties involved.

It would not be fair for the importer to slap the farmer with the entirety of the additional costs, they must have to wear some of it too.

Another farmer/grower noted producers should be incentivised not to pass on the full cost to the user:

Great idea to get all products under one scheme, just need the plastic producers to have an incentive to add to their company stewardship record, or they will just pass all the cost onto the end user, who is doing the work to return the containers etc in a suitable form (triple rinsed etc) to the scheme.

A retailer considered it unfair to apply a fee on agricultural products but not on other products with similar packaging.

This selective application disproportionately impacts both consumers and producers. By arbitrarily increasing costs for essential retail fertiliser and retail agrichemicals, the regulations create an uneven playing field where certain products are penalised while others remain unaffected.

Direct imports

A submitter (producer/brand owner and recycler) stated support as long as the fee is applied to all products, including consumer direct imports.

The Canterbury Waste Joint Committee Staff Group and a producer/brand owner asked how online purchases and imported products would be tracked and regulated.

Eco-modulation

Plasback, Tama Group Oceania and three producers/brand owners called for a reduced fee or fee exemption for products with post-consumer recycled content, where such content is at an agreed level and certified by a globally recognised authority, to encourage manufacturers to use recycled materials.

Eco-modulated fees were also recommended by Foodstuffs NZ “to drive the right behaviours and to ensure a shift towards more sustainable packaging options”.

Plastics New Zealand also expressed support for eco-modulation, but noted that “eco-modulation should only be applied in the context of a materials-agnostic scheme to avoid unintended environmental harm”.

Fee review

New Zealand Winegrowers noted future fee calculation must remain transparent and recommended prescribing a review in regulations.

NZW [New Zealand Winegrowers] recommend prescribing a fee review period within regulation to promote greater fee certainty. This may prevent the possibility of spikes in fee levels and ensures changes are reviewed, consulted on and managed in a sustainable way. A review period of 3 years would align with typical fee review periods in other legislation.

Impact on small-scale farms and producers

Manawatū District Council was supportive of stewardship fees because they “internalise end-of-life costs and ensure sustainable scheme funding”, but expressed concerns that small farms may be disproportionately impacted.

The Manawatū District Council supports the Ministry’s approach of keeping stewardship fees proportionate and ensuring the overall scheme remains practical, accessible, and cost-effective for farmers. Maintaining this balance is crucial to support the viability of farming operations while achieving the environmental objectives of the stewardship scheme.

[The Manawatū District Council] notes that while smaller farming operations would be generally supportive of the proposed stewardship scheme, there is some concern that they may lack the economies of scale to absorb additional expenses, thereby being disproportionately impacted, particularly for farmers that are already operating on a tight budget.

A retailer considered the proposals would place a disproportionate burden on consumers purchasing in-scope products for home gardening and small-scale food production, as well as on producers with low sales volumes.

Other comments

A submitter highlighted that the cost burden of proposed fees must be accurately communicated to stakeholders. It should be made clear to farmers that the scheme will lead to increases in the prices of affected products, because fee costs will not be absorbed by suppliers or retailers.

Two individual submitters who did not support the introduction of fees noted that many of the in-scope products are reused by farmers.

Other unsupportive submissions commented on the costs or limited benefits of the proposal. For example:

If a scheme is viable to work it should be able to operate without the fee.

If the farmer doesn’t see the value, this is just an added cost to the farmer for no real benefit to the environment.

The proposed levy imposes costs at an inappropriate stage in the process, which will result in significantly inflated recycling expenses.

At a time when living costs are already rising, imposing additional levies on fertiliser and home gardening products in general will directly harm consumers-especially those who rely on home gardening and small-scale food production to offset grocery expenses. These regulations threaten affordability, discouraging families and individuals from growing their own food at a time when self-sufficiency is increasingly necessary. The Ministry must consider the unintended economic harm these levies will impose, particularly for lower-income households.

Changes that could gain support for the proposal

We also asked respondents what changes we could make to the proposal to gain their support, in cases where they answered 'no' for any of the product categories.

Most responses to this question related to the product scope. The Packaging Forum, New Zealand Food and Grocery Council and Retail NZ reiterated the position expressed under previous questions and recommended that household pest and weed control products and small plastic bags of 40 kg or less be excluded from the scope. A producer/brand owner asked for the scheme to include only products supplied for direct use on farm. A submitter from the waste industry asked for the exclusion of small bags of non-hazardous products.

A producer/brand owner and two farmers/growers mentioned costs. For example:

The cost has to feel like there is value to the farmer, producer and the general public. It doesn't at the moment.

If you could guarantee that the final consumer of the agricultural products will cover the costs, as we are an industry that is a price taker, not a price maker.

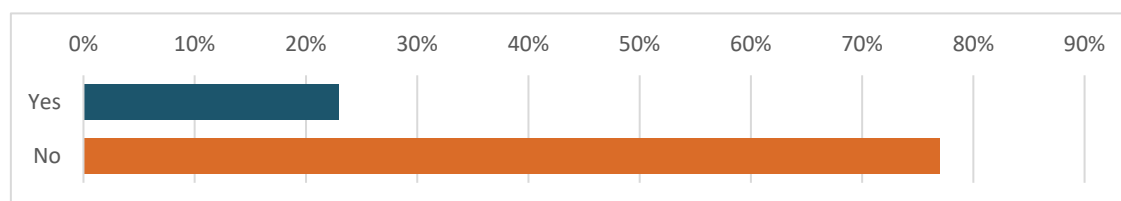
This needs to be the most cost efficient for the farmers and the proposed levy is definitely not.

Product exemptions

We asked the public whether any particular products in the four proposed categories should be exempt from regulation.

There were 118 responses to this question. A minority (23 per cent) of those who answered the question supported exemptions (see figure 7). Of these, nine submitters¹⁵ believed all products should be excluded (ie, no products should be regulated).

Figure 7: Responses to Question 8: *Do you think that any particular products in the four proposed categories should be exempt from regulation? (n = 118)*



¹⁵ Seven submissions stated this explicitly in comments. Two others implied it by stating in the comments to this question that they supported Option 2 – No action.

The Packaging Forum, New Zealand Food and Grocery Council, Retail NZ and two retailers reiterated their request to exclude products intended for household use and that would not be used by farmers or growers at scale (in particular, small bags and household pest and weed control products). (See also [Cross-cutting issues and other feedback](#).)

Other submissions mentioned the following should be considered for exemption:

- silage wrap
- seed that is packaged for sale offshore
- any products that can be reused or repurposed in the community
- agrichemicals that are already free to return via the current Agrecovery scheme
- seed bags, because they are often repurposed
- containers under 4 litres
- product that is supplied as a raw material to a fertiliser manufacturer, because these firms already have recycling outlets for the packaging
- bale wrap and silage sheet made from biodegradable materials, provided those have been verified as biodegradable in farm conditions and do not generate harmful residues, such as microplastics or toxic residues.

One submitter¹⁶ sought clarification on how the scheme intends to treat suppliers who achieve the waste minimisation goals outside of the scheme itself. For example, should an alternative recycling process that is superior to that offered by the scheme become available, would suppliers be able to divert their products to this alternative recycling stream and reclaim any fees paid to the scheme?

Re-exported products

We asked the public whether they were aware of imported products – among the categories proposed to be in scope of the regulations – that are subsequently re-exported in the same packaging without being used in New Zealand. Most submitters stated they were not aware, or did not answer this question. A few submissions confirmed that such re-exports occur (table 2). Examples given were animal feed bags, seed and grain bags, bale wrap and silage sheet.

Table 22: Responses to Question 9: *From the following list of products proposed to be in scope of regulations, are you aware of any imported products that are subsequently re-exported in the same packaging without being used in New Zealand?*

Product category	Submissions answering 'yes'
Agrichemicals sold in containers and drums of 1,000 litres or less (including household pest and weed control products)	1
Plastic bale wrap and silage sheet	6
Small plastic bags (40 kilograms or less when full) containing products such as seed, feed, fertiliser, soil and crop inputs, farm and animal supplements	5
Bulk woven polypropylene bags (over 40 kilograms when full) containing products such as seed, feed, fertiliser, soil amendments, minerals and bulk nutrition	4

¹⁶ Identifying as farmer/grower, producer/brand owner and rural contractor.

Agrecovery noted:

Agrecovery is aware that in limited instances, some imported products are re-exported in their original plastic packaging. These occurrences are uncommon, but where they do occur, we agree that they should be exempt from scheme fees. We recommend that the regulations include a clear exemption mechanism for these specific cases to avoid the unintended imposition of costs on products that do not enter the New Zealand waste stream. However, it is important that such exemptions are tightly defined and subject to verification to prevent abuse or the creation of loopholes. This will ensure the scheme maintains integrity while remaining fair and proportionate.

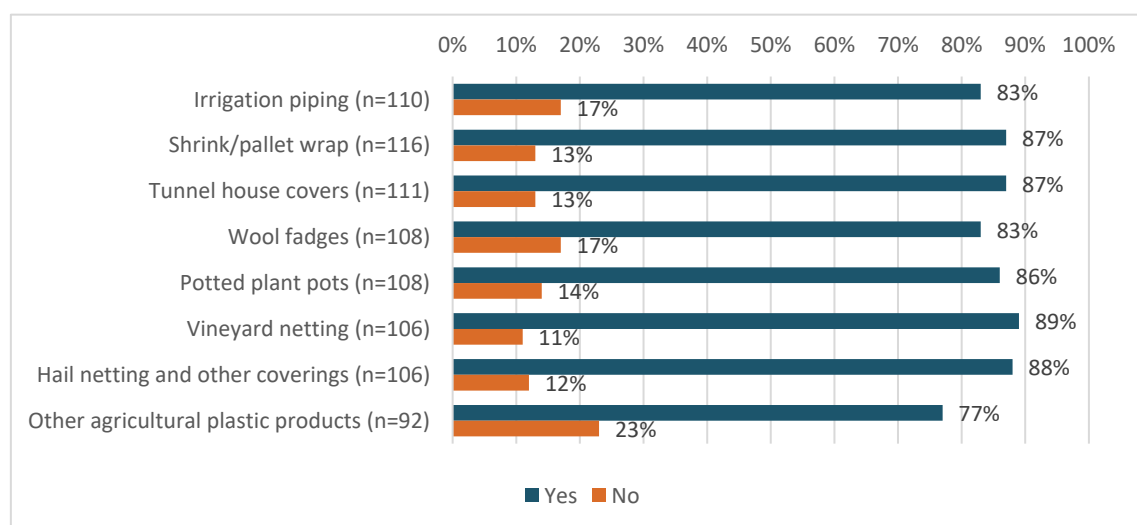
Expansion to further products in future

The accredited scheme may progressively expand to other plastic waste, including:

- irrigation piping
- shrink and pallet wrap
- tunnel house covers
- wool fadges
- potted plant pots
- vineyard netting
- hail netting and other coverings
- other agricultural plastic products.

These products are out of scope of the regulations proposed at this time. We asked the public whether they supported the inclusion of these products in a regulated product stewardship scheme in future, subject to further government consideration. The majority of submitters were supportive of all product categories (see figure 8).

Figure 8: Responses to Question 10: *Do you support the inclusion of these products in a regulated product stewardship scheme in future, subject to further government consideration?*



Other products proposed for future inclusion

Submitters who supported the inclusion of other products mentioned:

- bale netting¹⁷
- silage netting
- baling twine¹⁸
- centre rolls from bale wrap
- synthetic horse covers and other equestrian equipment made from plastic (eg, brushes, halters, boots, bandages, synthetic saddle blankets, plastic jump stands and jump fillers)
- veterinary products,¹⁹ such as plastic vaccination packs, flexi-packs, syringes, metabolic solution bags (eg, Elanco), animal health treatments and teat sealant products
- drench containers
- waste oil and oil containers
- low-density polyethylene (LDPE), medium-density polyethylene (MDPE) and polyvinyl chloride (PVC) pipe
- orchard ground cover (Extenday)
- pond liners
- woven polypropylene (PP) bags under 40 kg
- bird exclusion netting, polypropylene horticulture netting
- white reflective mulch and silver reflective mulch
- mulch films used for fumigation or weed suppression
- windbreak cloth
- string used for kiwifruit
- fishing industry products
- rubberware
- rubber matting
- mussel floats
- bullets used to control worms in livestock
- pallet strapping
- gumboots (made of PVC)
- polytunnel film
- spray guards

¹⁷ Mentioned by eight submitters.

¹⁸ Mentioned by five submitters.

¹⁹ Animal and Plant Health Association New Zealand noted that, in supporting inclusion of veterinary medicine products, members also added that “care needs to be taken so stewardship schemes don’t jeopardise product quality and protection, which has implications under the Agricultural Compound and Veterinary Medicines Act 1997, nor create perverse incentives or a competitive disadvantage for New Zealand.”

- large LDPE bags and sacks
- plastic equipment like tanks
- frost covers
- polystyrene used in the agricultural sector (noting that this may be better suited for a different product stewardship scheme)
- household pest chemical bags (under 40 kg) from hardware and gardening stores
- polythene ground coverings for fumigation or squash and berry growing
- reflective ground matting
- vine and tree ties
- tree guards
- water tanks, troughs, feeders and any other blow-moulded plastic products (noting these have recycling solutions that could be expanded through mandatory product stewardship)
- tanalised posts and other treated timber (whether as part of this scheme or a separate one), because they contain hazardous chemicals that pose a risk to human health and the environment if inappropriately stored or disposed of. Recycling and repurposing solutions are available, but cost is a barrier
- plastic lining in paper bags, commonly used for products like sulphur (to be included in the 'small plastic bags' category).

Several submitters commented that all agricultural plastics should be included over time.

Hastings District Council and Napier City Council noted that inclusion of a wider variety of materials should be mandated in a quicker timeframe than proposed.

The Village Agrarians Charitable Trust mentioned the wider scope of the Declaration of Priority Products Notice 2020. The Trust noted that the current Plasback voluntary scheme covers a wider range of products that are not included in the scope of the proposed regulated scheme (such as polypropylene twines, vineyard nets and monofilament nets).

It is understandable that not all items [from the Declaration of Priority Products Notice] are ready to be added immediately or simultaneously, but providing certainty that they will be added is important.

Similar comments were submitted by Otago councils:

This submission seeks more certainty that the items from the Declaration of Priority Products Notice 2020 not outlined for this proposed product stewardship scheme will be added in the near future. Clear timelines or phased inclusion with regulatory backing are needed (...)

We support expanding the scheme to include other agricultural plastic products in the future, provided that prioritisation is based on environmental risk, product volume, and availability of reuse or recycling options.

As new recycling pathways emerge or products are redesigned to fit existing systems, items such as plastic oil drums, paint containers, alkathene pipe, plant guards, fencing components, water tanks and other blow moulded plastics, and milking-related plastics should be considered for inclusion.

Products posing higher environmental risks should take precedence over lower-risk items.

We also recommend that the scheme be future-proofed to allow inclusion of non-plastic (e.g. sharps) and composite materials, to address the broader environmental impacts of farm waste. We recommend that the scope be broadened to include other industries eg. landscapers, construction and supermarkets – particularly when considering products such as pallet wrap, irrigation piping and plant pots.

Other comments

The Packaging Forum, New Zealand Food and Grocery Council, Retail NZ and two retailers did not support including shrink or pallet wrap unless it is used on farms or by the rural supply chain. Some of these stakeholders also noted that the DIY and garden retail sector sells items like irrigation piping, netting, coverings and plant pots as consumer products, not farm-specific, which should therefore be part of the Plastic Packaging Product Stewardship Scheme. Otago councils also questioned whether the farm plastics scheme is the correct one for shrink or pallet wrap and potted plant pots, given that they are used more widely than in rural situations.

Hastings District Council considered the inclusion of irrigation piping, shrink or pallet wrap, wool fadges and potted plant pots should be mandated within the same timeframe as the four main streams, given that solutions already exist for their recycling in New Zealand. For vineyard and hail netting, they noted recycling solutions exist offshore, and mandating their inclusion in the scheme in a shorter timeframe would potentially enable the establishment of onshore processing.

New Zealand Winegrowers recommended earlier prioritisation of irrigation line and plastic netting, which are widely used in vineyards. They also noted that Plasback already accepts these materials for recycling under the voluntary scheme.

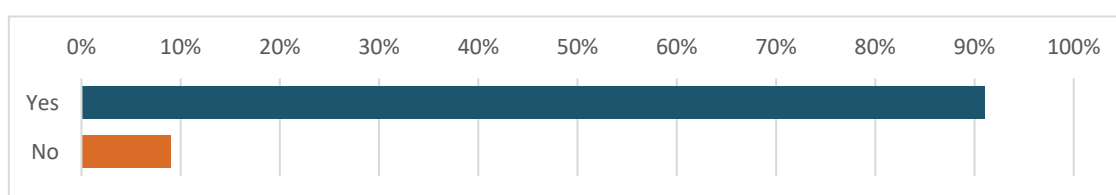
Earlier prioritisation of these materials will avoid fragmentation of return options for users, who presently operate on the understanding they can return these and other materials together. Changes to the status quo will mean that users must find alternate providers or avenues to dispose of out-of-scope products. It is vital to incorporate at the earliest opportunity to ensure the scheme benefits can be fully realised.”

The Federation of Business and Professional Women New Zealand urged that “planning immediately begin to enlarge the scheme to include further agricultural materials as soon as possible”.

Take-back service requirements

We asked the public whether they supported the proposal to require the product stewardship organisation to provide a take-back service for in-scope products and to prescribe requirements for that service. The majority (91 per cent) of those who answered the question supported this proposal (see figure 9).

Figure 9: Responses to Question 11: *Do you support the proposal to require the product stewardship organisation to provide a take-back service for in-scope products, and to prescribe requirements for that service?* (n = 124)



Comments and suggestions

Support only for some products

The Packaging Forum, New Zealand Food and Grocery Council, Retail NZ and two retailers stated they would support the proposal if the scope is limited to farm plastics and agrichemicals, and excludes products sold into households.

Synlait supported the proposal only for bale wrap, silage sheet and bags, not agrichemical containers.

Collection network coverage

Several submitters who were supportive of the proposal noted the importance of ensuring sufficient coverage across the country, including smaller rural areas.

Eight submissions²⁰ on this question commented that take-back services should include on-farm collections rather than drop-off. (See also [Cross-cutting issues and other feedback](#).) For example, Plasback cautioned that, having paid a fee on the product, farmers may have an expectation that it would be picked up. In their view, asking the farmer to pay again for on-farm collection “may cause issues, and may result in burying and burning instead in some cases”. Plasback and Tama Group Oceania also expressed concerns that temporary drop-off sites would cause spikes in product availability at processing sites.

Operational requirements

Tama Group Oceania noted collected materials should be in liners, not loose. They also recommended a ‘track and trace’ tag to link collected products to the farm where they originated, so that the cost of disposing of contamination can be charged back to the farmer.

Otago councils noted the need for clarity around the handling of residual chemicals, whose collection, transport and storage pose health and safety risks and may require specialised facilities, training and compliance with hazardous waste regulations. They emphasised the importance of maintaining safe and well-managed collection infrastructure.

Otago councils also noted regional recovery hubs should be strategically located with access to transport infrastructure and supported by investment in domestic reprocessing capacity.

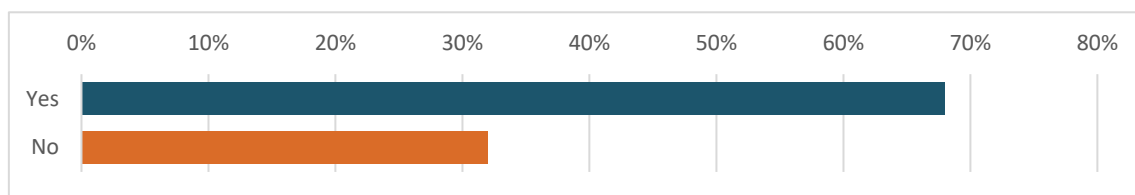
An individual submitter noted collection points should have sufficient space and suggested penalising those that reject product because there is no space left.

Ministry recovery of performance monitoring costs

It is proposed that a small part of the stewardship fee revenue would be transferred by the scheme manager to the Ministry for the Environment, to cover the Ministry’s cost of monitoring the scheme’s performance. We asked the public whether they supported this proposal. Of the 122 submitters who answered this question, 68 per cent supported the proposal (see figure 10).

²⁰ Of which six answered ‘yes’, one ‘no’, and one did not answer the question.

Figure 10: Responses to Question 12: *Do you support the proposal that the Ministry will charge the accredited scheme to recover the costs of monitoring the performance of the scheme?* (n = 122)



Comments and suggestions

Some submitters acknowledged the importance of government monitoring to ensure scheme effectiveness, while others believed the scheme could monitor itself and self-report on performance.

Several submitters stated they supported the Ministry recovering the costs of monitoring, provided that those costs are limited, transparent and proportionate to the scale of monitoring required. Two submitters noted the amount paid to the Ministry should be reviewed over time and adjusted as needed.

A council noted waste levy funds could also be used for this purpose.

One submitter noted that the information gathered from the monitoring should be made readily available for companies to use.

Submitters who did not support this proposal noted concerns that it would further increase costs to the scheme and farmers. Some believed monitoring costs should be covered from general tax revenue.

Expected impacts of the two options

We asked the public whether they agreed with the description of expected impacts of the two options, as presented in the discussion document. The majority of those who answered the question agreed with the description of impacts (86 per cent for Option 1 and 80 per cent for Option 2) (see figure 11 and figure 12).

Figure 11: Responses to Question 13: *Do you agree with the description of the expected impacts of Option 1: Introduce WMA regulations?* (n = 118)

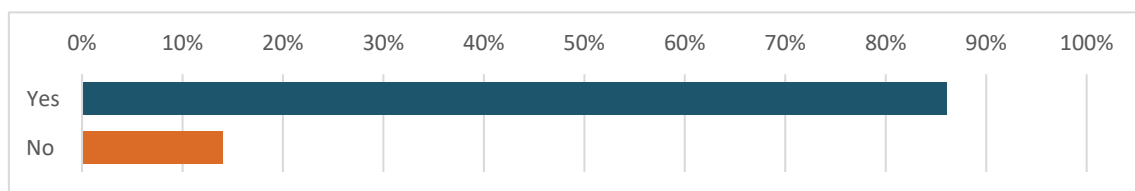
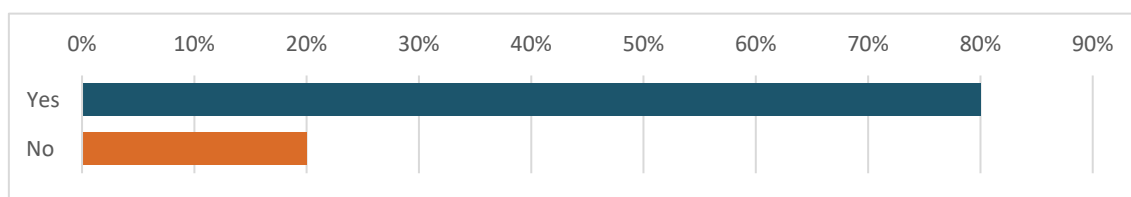


Figure 12: Responses to Question 14: *Do you agree with the description of the expected impacts of Option 2: No action (maintain the voluntary approach)?* (n = 111)



Comments and suggestions

Submitters who disagreed with the impacts description commented that:

- the effects of costs on production and consumers have not been considered
- the description ignores the risk of fee avoidance; some market players may try to avoid paying the levy, for example, by under-reporting
- the proposed fees are too low, and the impact would be greater with realistic fees
- the scheme will be too expensive and impractical
- increasing take-back services alone is unlikely to influence farmers who currently dispose of farm plastics through burning or burying, and on-farm collections and bans on burning and burying are needed to increase farmer participation in recycling schemes
- maintaining a voluntary approach does not exclude improvements.

Agrecovery, Plasback and Tama Group Oceania noted the description of Option 2 impacts understates the consequences of inaction. Tama Group Oceania stated it would not continue to collect via Plasback or invest further in the voluntary scheme. Agrecovery noted:

Without regulation, existing barriers will persist, particularly inconsistent access, limited coverage in rural areas, and the continued presence of free riders who undermine fairness and viability. More critically, there is a real risk that existing voluntary schemes, such as those operated by Agrecovery, will not be able to continue in the absence of regulatory support. The operational costs of running a national scheme, including system development, infrastructure, reporting, and compliance, are significant. Without a level playing field or guaranteed producer contributions, the return on investment becomes unviable.

If regulation does not proceed, there is likely to be a collapse of voluntary schemes and potential loss of the considerable investment made to date. Systems, IT infrastructure, and institutional knowledge developed over the past decade would be at risk. Based on our experience, it would take at least 7–10 years to re-establish a similar system, during which time plastic waste would accumulate, and the sector would lose both momentum and the goodwill from farmers.

Submitters who broadly agreed with the impacts description suggested the following additional aspects should be considered:

- impacts on smaller businesses and non-labile packaging manufacturers
- plastic waste generated by horse farms and lifestyle properties
- volatility of recycling markets, issues with New Zealand plastics being improperly disposed of overseas
- the need to establish reusable alternatives, or product redesign where possible
- best-practice examples from overseas

- insights from pilot programmes in New Zealand
- existing rural waste studies
- the lack of commercially viable recycling options onshore
- statistics on the number and regularity of Agrecovery agrichemical collections held
- statistics on the uptake of user-pays fees for Agrecovery agrichemical collections
- statistics on the decline rates due to user-pays fees in Agrecovery agrichemical collections, The Great DDT Muster and other rural hazardous chemical collections
- data on contamination rates, processing losses and the economic benefits of local processing infrastructure
- data on the proportion of plastics currently being stockpiled, burnt or buried
- current cost to ratepayers of local councils' work to monitor illegal burning on farms, or deal with any litter of agricultural products and packaging.

Impacts on scheme participants

We asked respondents how their business would be affected if they had to take part in the proposed regulated scheme.

Respondents currently participating in the Agrecovery and/or Plasback voluntary schemes stated the proposed changes would have a minimal impact on their business.

Several submitters mentioned additional costs arising from the proposals, with some considering this cost to be minimal and others too high. Besides costs arising from the stewardship fees, some farmers/growers mentioned costs (including time and labour) associated with administration and with the preparation, storage and transport of materials to drop-off sites.

A farmer/grower noted the proposal “would open an opportunity to access some marketing programs that require evidence of environmental stewardship (such as waste disposal and recycling)” that they might not otherwise be able to access.

Two producers, retailers and suppliers of in-scope products mentioned the levy would be passed on in full via a descriptive line on the invoice. There would be internal costs of compliance (not known at this time) and costs of managing up-front fees.

Council submissions mentioned:

Benefits for regional councils include: less agrichemicals stored or improperly disposed of on-farms that can harm people and the environment; less plastics stored or improperly disposed of on farms that can cause harm to people and the environment; and less financial contribution for regional councils to support voluntary take back events. (Waikato Regional Council)

Reduce the tonnage of waste placed in landfill. Providing more capacity for non-recyclable waste and potentially reduce the need for Territorial Authorities to run chemical collection events. (Ōtorohanga District Council)

Council would look to partner with any scheme provider to leverage off services and facilities we already provide to enhance the local uptake of the scheme. This includes promotional and educational awareness opportunities. (Whanganui District Council)

Cross-cutting issues and other feedback

This section summarises feedback on the recurring themes submitters mentioned in relation to multiple consultation questions or as additional points unrelated to a specific question.

Product scope: linkages to plastic packaging product stewardship

The Packaging Forum, New Zealand Food and Grocery Council, Retail NZ and two retailers²¹ did not support inclusion in the scheme of products intended for household use (ie, household pest and weed control product containers and small bags of up to 40 kg when full). In their view, this risks duplication with the current voluntary soft plastics scheme and proposed Plastic Packaging Product Stewardship scheme (PPPS). The main points raised in these submissions are as follows.

- The proposed scope risks capturing household and household-type products that are highly unlikely to be used in agricultural contexts. This would result in duplication with the proposed PPPS.
- Packaging and plastic that is already covered by other recycling schemes or potential future mandatory schemes, such as the PPPS, should be excluded from the farm plastics scheme to ensure that liable parties do not pay twice to recover the same packaging and materials.
- International best practice, including guidance from the Extended Producer Responsibility Alliance, supports single-scheme models to enable clarity, fair competition and effective fee modulation. Overlapping schemes create unnecessary complexity, enforcement risks and cost.
- Government should set clear definitions (eg, what constitutes a farm) and avoid ambiguous terminology (eg, 'pet food' versus 'animal feed').
- New Zealand Food and Grocery Council members report that only 5 per cent to 23 per cent of small plastic bags (40 kg or less) of seed, feed, fertiliser, soil and crop inputs, farm and animal supplements are distributed by volume to non-households.
- Urban households are highly unlikely to access farm plastic take-back services. Including household products in this scheme imposes costs without any corresponding environmental or service benefit. Cross-subsidisation between household and agricultural schemes must be prevented. Allowing fees from consumer goods to subsidise farm plastic recovery is unfair and distorts price signals.
- The fees proposed under the farm plastics scheme and the PPPS differ widely.

The concern about scope overlap was also shared by Foodstuffs NZ:

No matter where the definition for scheme scope ends up, it is important that there is a clear definition of scope between all relevant schemes. (...) If there is any overlap between product stewardship schemes, brand owners should be able to choose to join one scheme, irrespective of what the consumer does with the bags. Any scheme design should avoid any unintended consequence whereby a producer may be required to be part of and contribute financially to more than one product stewardship scheme for the same product. Equally, the scheme design should ensure that there are no regulatory gaps whereby producers are not within scope of any product stewardship scheme.

²¹ One of the two retailers is also a brand owner of relevant products.

A retailer and brand owner proposed two options for revising the scope.

- Option 1 – Scope-based exclusions: Amend the scope to exclude household pest and weed control products and small plastic bags (40 kg or less) containing products such as seed, feed, fertiliser, soil, crop inputs and animal supplements.
- Option 2 – Threshold-based exclusions: Set size and volume thresholds below which products are deemed for household use and unlikely to be used in farming at scale. They suggest excluding pest and weed control products of 20 litres or less and plastic bags containing products such as seed, feed, fertiliser, soil, crop inputs and animal supplements weighing 25 kg or less when full.

Coverage of agrichemicals

Several councils asked for clarification on the definition of ‘residual agrichemicals’ and what recovery and disposal would be covered by the regulated scheme.

Hastings District Council and Napier City Council called for the scheme to include recovery and collection of all agrichemicals and household pest and weed control chemicals sold into the market, as well as all legacy and orphaned chemicals, given the high risk of harm to crops, livestock, humans and ecosystems from incorrect disposal.

Hastings District Council further noted:

Current service levels for Agrecovery chemical collections are extremely low, for example there has not been a collection in Hawke’s Bay since 2019. It is our view that the chemical portion of the fee needs to be set at a level which allows for annual free-to-use recovery and disposal of residual chemicals for both agrichemicals and household pest and weed chemicals with no user-pays fees payable in all regions. We understand that the amount of chemicals registered for The Great DDT Muster well outstripped expectations and there is potential for there to be greater volumes of legacy and orphaned chemicals stored on farm than expected for a number of reasons such as changes of ownership, hesitancy to report stockpiles of banned chemicals, etc. It is our understanding that the proposed regulations exclude bulk volumes of unsold agrichemicals and household pest and weed control chemicals from retailers as levies would not be paid on these. (...)

We would also encourage the Ministry to give careful consideration to the frequency and location of collection and disposal services for household pest and weed control chemicals and their containers. We consider the scheme should ensure appropriate free-to-use collection models for containers are in place, particularly in highly populated urban areas. We also consider that the scheme needs to hold, at a minimum, annual free-to-use recovery and disposal collections in all main urban areas with at least one (well-advertised) collection per TA [territorial authority] region to replace household hazardous chemical collection and disposal events/services typically provided by local councils and funded through rates.

Otago councils²² expressed similar concerns about the potential for large volumes of legacy agrichemicals, and recommended the fee be set at a level that allows for free-to-use recovery and disposal.

Manawatū District Council noted that a user-pays approach for bulk or non-residual agrichemicals may discourage proper disposal, create confusion for users and lower confidence and participation in the scheme. They recommend clear communication and

²² Clutha District, Central Otago, Waitaki District, Queenstown Lakes District, Dunedin City and Otago Regional Council.

labelling, and encourage the Ministry to consider options for integrating bulk and non-residual agrichemical disposal into the stewardship scheme in the future.

Whanganui District Council commented that the proposed fees for the handling and disposal of chemicals seem low based on the council's experience. They also noted councils have been providing drop-off facilities for hazardous wastes and could partner with the scheme to continue doing so.

The role of councils in chemicals collection was also mentioned by Waimakariri District Council:

We request the Ministry gives consideration to the status of Council-provided hazardous waste drop-off facilities under this scheme. As a Council, we provide free disposal of household hazardous waste, and the disposal costs are funded through a combination of rates, levy funding and gate-fees.

The Council highlight that if household pest and weed control products are included in this scheme, then the disposal of these products should be covered by the scheme's fees. We also receive some agrichemicals at our facilities, these should also be covered by the scheme's fees, to reduce the need to use rates for products that are part of a stewardship scheme.

Scheme governance

Plastics New Zealand noted the scheme must also include mechanisms for stakeholder consultation and input into scheme governance, especially for sectors not directly represented by existing voluntary schemes.

A producer/brand owner recommended that there be at least one or two trustees on the PSO board appointed by crop packaging suppliers, who have direct knowledge of the realities of importing and manufacturing these products, and the costs suppliers face.

The same producer/brand owner raised concerns about the PSO's information-gathering and audit powers. They noted measures must be put in place to prevent the abuse of suppliers' commercially sensitive information and ensure transparency around the PSO's handling of that information. They called for measures to ensure the PSO's power to audit market suppliers (to verify self-declared sales data) is only used when necessary and that the information accessed is not abused. In particular, they sought assurance that there can be no transfer of commercially sensitive information from the PSO to competitors of the parties disclosing their data.

We understand the need for verification that businesses are correctly declaring the volumes of regulated products they are bringing into the market, in order for the system to function properly and fairly. However, the power to independently audit a company is a powerful one that is typically reserved for government agencies. It should not be bestowed lightly and without adequate controls on its use. An audit would be highly disruptive and costly to a supplier, entail opening up even more detailed commercially sensitive information to the PSO and its auditors and would potentially have reputational impacts.

Take-back model: on-farm collection versus drop-off

Fifteen submissions²³ expressed a preference for on-farm collection of farm plastics, rather than the proposed drop-off system. Among the reasons for this, submitters were of the view that the drop-off model is more costly and less convenient for farmers because it makes it harder to avoid contamination (because users may drop off out-of-scope or insufficiently cleaned products, or materials may get contaminated in transit) and causes spikes in product availability for processing.

One of these submitters also considered the proposed drop-off model unlikely to significantly reduce the burning of farm plastics, because burning would be perceived as the more convenient disposal method:

In regions such as Otago, where burning farm film plastics is still considered acceptable, many farmers view this as the easiest and most cost-effective option. Without a system that matches or exceeds this level of convenience, it's unlikely that behaviours will shift significantly. The reality is that take-back schemes, while well-intentioned, are rarely convenient for busy farmers. Items intended for recycling often end up being set aside or forgotten, only to be disposed of later during a general farm clean-up—frequently ending up in the rubbish pile or being burned. To drive real change, recycling solutions need to be not only affordable but also as easy and accessible as current disposal practices. Matching that level of convenience is key to increasing participation.

Complementary policies

Nationwide ban on burning farm plastics

Several submissions²⁴ called for a nationwide ban on burning farm plastics. For example:

In Otago, burning and burying farm waste remains a permitted activity. This undermines the effectiveness of product stewardship by reducing motivation to adopt better waste management practices. A national ban on burning and burying farm waste which is not safe to dispose in ground pits would support the intended outcomes of the scheme and create a consistent regulatory baseline across the country. (Otago councils)

If product stewardship is established there is a viable system for collection, and a national ban on burning and burying plastic should be implemented which will support unified rules to be enforced. (Waikato Regional Council)

As long as farmers/rural people can burn plastic while complying with the rules of the Regional Councils, some farmers will take the option, as it's what they have always done. The change needs to come from across all levels of government – central, regional and local.

²³ Plasback, Tama Group Oceania, Donaghy's, Agpac, Manawātū District Council, Otago councils and several farmers/growers (some of whom also identified as rural contractors, recyclers, transport industry, and industry body/producers and/or supply chain for in-scope products).

²⁴ Otago councils, Waikato Regional Council, Village Agrarians Trust and four farmers/growers (some of whom also identified as rural contractors, recyclers, transport industry, and industry body/producers and/or supply chain for in-scope products).

A submitter noted that enforcement could rely on the audits that farms are subject to as part of their activities:

Most farms are already subject to audits or consenting processes for winter grazing, which presents a valuable opportunity to integrate recycling compliance into existing frameworks. This would not be difficult to implement, as auditors and consenting authorities could simply request evidence of recycling through receipts or collection records.

Rules on the management of bale wrap

A farmer/grower and rural contractor recommended setting rules on how bale wrap is stored and managed on farm, to prevent it from spreading in the environment. For example, rules could prevent farmers from having loose bale wrap on farm or storing bales in flood plains. The submission also highlighted that councils should be enabled to enforce clean-ups.

Encouraging product reuse and alternatives to plastic

Several submissions²⁵ noted the scheme should go beyond recycling to reduce waste at source and incentivise product reuse. For example:

The consultation addresses an end-of-life solution to deal with the most used products on farm by collection and recycling to the extent that is possible. Part of a future solution to waste minimisation should also be to incentivise a reduction in the number of containers and plastic products used on farm and solutions that could reduce on-farm waste overall. We understand that this is not part of the current consultation but we believe that it could be part of future changes or solutions proposed through the new product stewardship scheme. (DairyNZ)

Limited availability of reuse systems and lack of infrastructure for circular economy approaches are another consideration which this scheme could incorporate. The scheme could go further by requiring producers and importers to design for reuse where possible, and by supporting initiatives that promote circular business models and reusable packaging. (Otago councils)

Several submissions noted the regulations should incentivise development and uptake of alternatives to plastics, such as biodegradable products. For example, Waikato Regional Council recommended complementary legislation that incentivises products that require no further processing, such as edible bale netting. Similarly, AgritechX Limited recommended prioritising “investment in alternative materials that eliminate the need for complex disposal systems altogether”, rather than focusing on recycling alone.

While recycling plays a role, the long-term solution lies in materials that can naturally decompose on-farm or serve secondary purposes. Edible hay bale wraps demonstrate that innovation in this space is possible, and further support for research and development will accelerate adoption across other farm plastics.

Funding and incentives should be directed toward businesses, manufacturers and suppliers to bring biodegradable alternatives to market at scale. (...)

Where compostable or reusable options are viable, they should be prioritized over traditional plastics.

²⁵ DairyNZ, Otago councils, Waikato Regional Council, WasteMINZ Product Stewardship Sector Group, 3R Group, Village Agrarians Charitable Trust.

A research organisation (AgResearch) suggested materials and products verified as safe to be disposed of on farm should be considered for exemption from the regulations.

The proposed stewardship scheme would include natural products (e.g. jute twine/bale nets, at the stage when these categories come into scope) and biodegradable plastics (e.g. biodegradable bale wrap). We are concerned that the scheme might, because of its focus on recycling, inadvertently discourage uptake by end-users of these products, which do not present the same pollution issues as conventional synthetic plastics. If materials and products can be shown not to result in microplastic pollution, and can be safely disposed of on the farm, consideration should be given to whether they should be included in the product stewardship scheme. Not all biodegradable plastics are created equal, so in this scenario, verification of biodegradability behaviour (at the manufacturer/supplier's expense) would be essential to determine if they could be exempt from the scheme.²⁶

Developing onshore processing capacity

Three submissions noted the need to support the development of onshore processing solutions for farm plastics.

Manawatū District Council noted that reliance on offshore processing exposes the scheme to risks such as regulatory changes overseas and volatility of markets for recycled plastics. The council therefore recommends funding or co-investment in local washing, shredding and recycling facilities, similar to the approach taken under the Tyrewise scheme for end-of-life tyres.

Plastics New Zealand also noted that prioritising local reprocessing helps reduce environmental impacts associated with long-distance transport, builds national circular economy capability and enables clearer material traceability and quality control.

A producer/brand owner expressed concerns with the lack of a local outlet for the collected waste plastics. They suggested the scheme could partner with engineering schools in universities to encourage new and innovative ways to process and use waste plastics.

However, two submitters (from the same rural contracting company) considered local processing should not be given preference over exports unless it is commercially viable and market-driven. They noted scheme funds should not be used to subsidise local processing.

Education and communication

Several submissions emphasised the need for education and clear communication to drive behaviour change and uptake of scheme services. For example:

The risk of heavy metals and plastic pollutants entering the environment through poor disposal practices is of concern. There needs to be a clear emphasis within this proposed scheme on education, which will support the behaviour change component necessary for long-term impact. (Otago councils)

During the recent farm waste event, a substantial proportion of bale and silage wrap was found to be heavily contaminated with soil and organic matter, which significantly impedes recycling processes. This highlights the urgent need for targeted education

²⁶ AgResearch also suggested non-recyclable biodegradable products collected under the scheme could be redirected to industrial composting facilities, where available, so that they can be biodegraded for use as compost and soil conditioners, rather than being sent to landfill where they would biodegrade only slowly.

and engagement with the rural sector to promote best practices for the storage and handling of used bale wrap specifically, encouraging farmers to shake off excess silage and dirt before storage, and to keep material as clean and dry as possible. (Manawātū District Council)

Communication efforts must ensure users can easily distinguish between in-scope and out-of-scope products. Industry engagement in this process would also be valuable, to tailor messages and utilise channels to reach our members. (New Zealand Winegrowers)

Collaboration with certification schemes

Otago councils' submission noted participation in the scheme should be encouraged by offering market access benefits or premium pricing for farm businesses that use the scheme. They suggest partnering with programmes such as the New Zealand Farm Assurance Programme (NZFAP).

Whanganui District Council similarly noted the need to “demonstrate products within the scheme are processed in a sustainable manner with suitable incentives and accreditations for farmers, growers and users to encourage and reward their participation”.

End-market verification for waste exports

Hastings District Council encouraged the Ministry to include mandatory end-market verification for any exported materials collected by the scheme. They recommended the scheme should be required to verify and audit end markets on an ongoing basis.

Scheme responsibility in the event of an emergency

Hastings District Council noted producers and accredited schemes should also bear some responsibility for managing their products in the event of an emergency:

Given our experience with emergency waste following Cyclone Gabrielle which included the full range of farm agrichemicals, plastics and other materials, for example irrigation pipe, reflective mulch film, tanalised timber, rainwater tanks, we urge the Government to consider the responsibility of producers and accredited schemes to manage end-of-life recovery and disposal in the event of an emergency. We consider that schemes should be required to set aside a portion of levy funding to cover emergency waste management for mandated products.

About the consultation

This document reports on the findings of public consultation by the Ministry on proposed product stewardship regulations for agrichemicals, their containers and farm plastics.

[View the discussion document.](#)

Background

Currently, not all farmers have access to take-back and recycling services for agrichemicals, their containers and farm plastics. This contributes to ongoing but avoidable practices, such as on-farm burning, burial or indefinite storage in some rural areas. This, in turn, risks harming the environment and our health, and losing recyclable materials.

In 2020, agrichemicals, their containers and farm plastics were among the six product groups declared as priority products under the Waste Minimisation Act 2008 (WMA).²⁷ Once a product is declared a priority product, a stewardship scheme²⁸ for the product must be developed and accredited as soon as practicable. Regulations can also be made under the WMA to support product stewardship.

Building on two existing voluntary schemes, agricultural sector groups have worked together to design a single consolidated national scheme that simplifies and increases access to take-back services for farmers and other consumers. This national scheme, managed by the Agrecovery Foundation, was accredited in October 2023. It is not operating yet, pending government decisions on supporting regulations.

We consulted on two options.

- Option 1: Introduce WMA regulations to support the accredited scheme for agrichemicals, their containers, and farm plastics.
- Option 2: No action (maintain the voluntary approach).

Proposals

Under Option 1, WMA regulations would prohibit the sale of agrichemicals in specified container types and certain farm plastics, except in accordance with the accredited scheme. Producers and importers would need to sell four product groups in accordance with their obligations under the scheme:

- agrichemicals sold in plastic containers and drums of 1,000 litres or less (including household pest and weed control products)
- plastic bale wrap and silage sheet
- small plastic bags (40 kg or less when full) containing products such as seed, feed, fertiliser, soil and crop inputs, farm and animal supplements

²⁷ New Zealand Government. 2020. *New Zealand Gazette*. [Declaration of Priority Products Notice 2020](#) (updated 29 September 2020).

²⁸ Product stewardship is where people and organisations involved in the life cycle of a product (eg, producers, importers, retailers and consumers) share responsibility for minimising environmental harm and maximising net benefit from the product at the end of its useful life.

- bulk woven polypropylene bags (over 40 kg when full) containing products such as seed, feed, fertiliser, soil amendments, minerals and bulk nutrition.

All producers and importers placing in-scope products on the New Zealand market would be required to pay a stewardship fee (per unit of in-scope product sold) to cover end-of-life management of the products. The proposed fees are typically around 1 per cent or less of the full product price. The PSO would be responsible for collecting the fee.

The PSO would be required to provide a take-back service for in-scope products. Farmers and other consumers of the products would be able to either:

- drop off their agrichemical containers and in-scope farm plastics at no charge to one of the collection sites
- have the products picked up from their premises, if they meet the criteria for remoteness and product weight.

Under Option 2, no WMA regulations would be introduced to support product stewardship of agrichemical containers, residual agrichemicals and farm plastics. Producers' and importers' participation in stewardship schemes for these products would remain voluntary.

Consultation process

How we consulted

Consultation was open from 31 March to 2 June 2025.

[View the discussion document.](#)

We received 144 submissions through three channels:

- online, through the Citizen Space platform (129 submissions)
- by email to the Ministry (14 submissions)
- by post to the Ministry (1 submission).

Submitter types

Table 3 shows the number of submissions per submitter category. (Some submitters indicated multiple categories.)

Table 3: Number of submissions per respondent category

Respondent category	Submissions	Percentage of total (144)
Farmer and/or grower	68	47.2%
Producer/brand owner of agrichemicals	4	2.8%
Producer/brand owner of agrichemicals – household products	5	3.5%
Producer/brand owner of bale wrap or silage sheet	7	4.9%
Producer/brand owner of agricultural goods sold in plastic bags	5	3.5%
Producer/brand owner of products out of scope for these proposed regulations	3	2.1%
Industry body – farmers and/or growers	9	6.3%
Industry body – producers and/or supply chain for in-scope products	7	4.9%
Industry body – other	7	4.9%

Respondent category	Submissions	Percentage of total (144)
Rural contractor	10	6.9%
Retailer	8	5.6%
Waste industry	5	3.5%
Recycler	11	7.6%
Transport industry	3	2.1%
Education/school	1	0.7%
Youth	1	0.7%
Academic or subject matter expert	5	3.5%
Iwi/hapū	1	0.7%
Local government	13	9.0%
Regional council	5	3.5%
Non-governmental organisation	2	1.4%
Registered charity	5	3.5%
Individual	25	17.4%
Other	10	6.9%

Submission formats

This report summarises feedback from all submissions received, irrespective of format. Of those received, 134 submissions used the consultation template (ie, explicitly answered the [consultation questions](#)). The 10 other submissions presented positions and feedback on the consultation topics without explicitly answering the consultation questions. These 10 submissions are not captured in the ‘yes/no’ response totals presented in this report, but their feedback is included in the summaries of comments received.

Next steps

Publishing submissions

Alongside the release and publication of this document, we will also publish and release submissions from those who agreed to publication. These will be available on the Ministry’s website.

Policy decisions

The Ministry is advising ministers and Cabinet on next steps for product stewardship of agrichemicals, their containers and farm plastics. The advice is informed by this consultation and other Ministry work, including engaging with stakeholders, consulting across government agencies, researching best-practice methods from overseas and other work programmes.

Policy decisions are expected towards the end of 2025.

Stay up to date

To stay up to date on any decisions and announcements, visit the [Ministry for the Environment’s waste page](#), or [Facebook](#) and [Instagram](#).