



Summary of submissions

# Transboundary movement control of all e-waste under the Basel Convention

Te whakahaere nekenekenga whakawhiti rohenga  
o ngā ī-para katoa i raro i te Tikanga o Basel



Ministry for the  
**Environment**  
*Manatū Mo Te Taiao*



**Te Kāwanatanga o Aotearoa**  
New Zealand Government



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# Introduction

Importing, exporting and transiting non-hazardous and hazardous electrical and electronic waste (e-waste) can pose risks to the environment and human health when appropriate measures are not taken to manage such waste in an environmentally sound way. To address this issue, in 2022, Parties to the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal (Basel Convention) agreed to amendments to the Basel Convention.

New Zealand has been a Party to the Basel Convention since 1994 and is bound to comply with it. To comply with the e-waste decision, regulatory amendments to New Zealand's Imports and Exports (Restrictions) Prohibition Order (No 2) 2004 are necessary.

The Government's proposal is to amend the Imports and Exports (Restrictions) Prohibition Order (No 2) 2004 to require prior informed consent to import and export non-hazardous e-waste. This would be in addition to the current requirement for prior informed consent to import or export hazardous e-waste.

This report summarises the views expressed from public consultation. It does not analyse those views or make recommendations in response to them. Any such recommendations will be made through policy development and advice to the Government.

# Public consultation

## How we consulted

From 31 July to 28 August 2024, the Government consulted on proposals to amend the Import and Exports (Restrictions) Prohibition Order (No 2) 2004 to require prior informed consent to import or export non-hazardous e-waste.

To inform the consultation, the discussion document *Transboundary movement control of all e-waste under the Basel Convention* was published on the Ministry for the Environment (the Ministry) website on 31 July 2024. The consultation questions are in the [appendix](#).

## Consultation tools

Submitters were invited to submit their views using the Ministry’s online public engagement and survey platform Citizen Space ([Have your Say](#)) or by email to its consultation inbox ([basel@mfe.govt.nz](mailto:basel@mfe.govt.nz)). If identical submissions were made through both methods, one was counted and the other archived.

Submitters choosing to submit via Citizen Space could respond to the questions in the discussion document, with the option of answering all or some of the questions. Submitters could also add written feedback and provide additional supporting information.

## Who responded?

Although the response was relatively small (15 submissions), a good cross-section was represented of potentially affected businesses, industry bodies, iwi and hapū, registered charities and individuals. Most responses were submitted via Citizen Space. Table 1 shows the proportions of submitters from each group.

**Table 1: Number of submissions by submitter group**

Submitter type		Number
Organisation	Business	4
	Industry bodies	4
	Iwi, hapū and Māori organisations	1
	Registered charity	1
Individual	Academic or subject-matter expert	4
	Individual	1
Total		15

## Submitter comments

Comments from submitters are included throughout this summary. Footnotes state the name of submitters who consented for it to be published. Some comments are not footnoted, either for brevity, because they are paraphrased or because the submitter chose to remain anonymous.

## **Next steps**

### **Publishing submissions**

Alongside the release and publication of this report, 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 the next steps to implementing the Basel Convention e-waste decisions. This advice will be informed by the insights gathered from this consultation process and other Ministry work. It will include engaging with stakeholders, consulting across government agencies, researching best practice methods from overseas and other work programmes.

### **Stay up to date**

To stay up to date on any decisions and announcements, visit the Ministry's website or go to its Facebook or Instagram page.

# What we heard

## E-waste recycling in New Zealand

Electrical and electronic waste is known as e-waste. It contains components that encompass multiple streams of materials, including metals, glass, plastic, battery chemistries and packaging. Existing data on e-waste collection and disposal in New Zealand is not readily available because it is commercially sensitive and the means of collecting further data is limited.

Submitters were asked to describe what e-waste activities their company undertakes. Of the seven who answered question 1, all provided collection and recycling services for either a specific category or broad range of e-waste products. Four submitters provided services including collection, transport, sorting and reprocessing.<sup>1</sup> Two submitters operated voluntary product stewardship schemes<sup>2</sup> and one submitter specialised in the collection and export of printed circuit boards.<sup>3</sup>

One submitter noted that:

The metals recycling industry undertakes a broad range of recycling activities of a vast range of metal consumer goods, including electronic and electrical equipment. This includes manual processing, cutting, crushing, compressing and shredding.<sup>4</sup>

## Many submitters anticipate growth in onshore reprocessing facilities

We consulted on whether submitters anticipated growth in onshore reprocessing facilities. Of the eight who answered question 2, four anticipated growth in onshore reprocessing facilities,<sup>5</sup> two did not<sup>6</sup> and two were uncertain.<sup>7</sup> Comments and feedback related to onshore reprocessing facilities are summarised below.

- One submitter anticipates onshore facilities for processing lithium-ion and lithium-ion phosphate batteries<sup>8</sup> will be built and one submitter anticipates generic e-waste reprocessing<sup>9</sup> will be built.

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<sup>1</sup> Anonymous businesses (x 2), Abilities Incorporated, New Zealand Association of Metal Recyclers.

<sup>2</sup> Anonymous business, NZ Telecommunications Forum.

<sup>3</sup> New Age Materials Ltd.

<sup>4</sup> New Zealand Association of Metal Recyclers.

<sup>5</sup> Anonymous business, Anonymous industry body, Abilities Incorporated, Freda Woisin.

<sup>6</sup> New Age Materials, New Zealand Association of Metal Recyclers.

<sup>7</sup> Anonymous business, Anonymous iwi/hapū.

<sup>8</sup> Anonymous business.

<sup>9</sup> Abilities Incorporated.

- The capacity exists within the current network of onshore reprocessors. It is possible minor bespoke facilities could be built to reprocess select high-value materials with taxpayer funding.<sup>10</sup>
- New Zealand's small volumes make investment in new infrastructure challenging.<sup>11</sup>
- While not directly involved, three submitters support establishing onshore reprocessing facilities.<sup>12</sup>

## **New Zealand exports e-waste for recycling**

New Zealand reprocessors typically dismantle products into the component materials to export and on-sell for reprocessing. Submitters were asked what types and weights of e-waste they import and/or export. Of the five who answered questions 3 and 4, their comments and feedback are summarised below.

- The metal industry exports over 500,000 tonnes of ferrous metals and 127,000 tonnes of non-ferrous metals annually, much of which is recovered from electrical equipment. This can be sourced from appliances, home goods, communication, information technology, vehicles, medical, utility and manufacturing equipment.<sup>13</sup>
- Three submitters estimated 20 tonnes to 300 tonnes of printed circuit boards could be imported and/or exported.<sup>14</sup>
- One submitter estimated 150 tonnes to 700 tonnes of batteries could be imported and/or exported.<sup>15</sup>

One submitter commented:

Since its inception in 2015, [Remobile] has diverted 147.4 tonnes of e-waste from landfills.<sup>16</sup>

Submitters were also asked how often they shipped e-waste, whether they used brokerage services, which countries they shipped to and under which customs (harmonised system (HS)) codes. Of the four who answered questions 5 to 8, it was not clear if their shipments were for hazardous or non-hazardous e-waste. Their comments and feedback are summarised below.

- For two submitters, shipment frequencies ranged from 2 to 5 shipments<sup>17</sup> and up to 10 to 50 shipments a year.<sup>18</sup>
- For four submitters, the e-waste was sent to Australia, Belgium, Japan, Korea and Malaysia, either through direct arrangements or with the help of brokerage services like freight forwarders.<sup>19</sup>

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<sup>10</sup> New Zealand Association of Metal Recyclers.

<sup>11</sup> Anonymous business.

<sup>12</sup> Anonymous iwi/hapū, WasteMINZ Product Stewardship Sector Group, Anonymous individual.

<sup>13</sup> New Zealand Association of Metal Recyclers.

<sup>14</sup> New Age Materials Ltd, Anonymous business, Abilities incorporated.

<sup>15</sup> Anonymous business.

<sup>16</sup> NZ Telecommunications Forum.

<sup>17</sup> Anonymous business, New Age Materials Ltd.

<sup>18</sup> Abilities Incorporated, Anonymous business.

<sup>19</sup> Anonymous businesses (x 2), New Age Materials, Abilities Incorporated.



- Not all submitters were aware of the HS codes used,<sup>20</sup> but those who were referred to 8473.30,<sup>21</sup> 7112.99<sup>22</sup> and 9534.00.90.00.<sup>23, 24</sup>

## Product stewardship

In July 2020, e-waste was declared as one of six priority products for product stewardship under the Waste Minimisation Act 2008. Product stewardship encourages (and in certain cases requires) people involved in a product's lifecycle to share responsibility for minimising waste and managing any environmental harm when a product becomes waste.

Submitters were asked if e-waste product stewardship would affect shipment patterns. Six of the seven submitters who answered question 9, agreed patterns would be affected. Comments and feedback on the effects of product stewardship on e-waste shipment patterns are summarised below.

- Two submitters anticipate increased volumes of e-waste will be exported.<sup>25</sup>
- One submitter noted that product stewardship will aim for high recovery rates and zero waste to landfill. "Given land scarcity, we need to ensure we avoid e-waste going to landfill."<sup>26</sup>

A submitter commented:

This amendment will only work to the best of its ability when enacted alongside other proposals, such as mandatory management schemes (currently we only have voluntary schemes) and/or mandatory EPR (Extended Producer Responsibility) which boasts some of the highest e-waste recycling rates globally since its enactment in the EU [European Union] in 2003.<sup>27</sup>

One submitter commented:

A mandatory product stewardship will assist major OEMs [Original Equipment Manufacturers] importers and alike to plan their products' end-of-life when importing their products into NZ. Having end-of-life plans helps to ensure recoverable resources are diverted from landfill and recycled in an environmentally sound manner.<sup>28</sup>

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<sup>20</sup> Anonymous business.

<sup>21</sup> Parts and accessories (other than covers, carrying cases and the like) suitable for use solely or principally with machines of headings 84.70 to 84.72.

<sup>22</sup> Waste and scrap of precious metal or metals clad with precious metal; other waste and scrap containing precious metal or precious metal compounds, of a kind used principally for the recovery of precious metal other than goods of heading 85.49 other.

<sup>23</sup> Chapter 95 relates to toys, games and sports requisites; parts and accessories thereof.

<sup>24</sup> Anonymous business, New Age Materials Ltd, Abilities Incorporated.

<sup>25</sup> Abilities Incorporated, WasteMINZ Product Stewardship Sector Group.

<sup>26</sup> Anonymous business.

<sup>27</sup> Anonymous individual.

<sup>28</sup> Anonymous business.

Another submitter commented:

By prioritising material recovery over collection, the scheme can facilitate the development of advanced recycling facilities and technologies, thereby reducing reliance on overseas processing ... moreover, as product stewardship encourages the recovery of valuable materials through reuse and repair, it is expected to stimulate growth of refurbished products in the market.<sup>29</sup>

Further comments from submitters about product stewardship that fall out of scope for this consultation can be found under [Additional feedback and comments](#).

## Distinguishing between waste and non-waste

Submitters were asked how they currently decide whether a shipment is waste or non-waste. Of the six who answered question 10, two sought guidance from the Environmental Protection Authority (EPA)<sup>30</sup> and one stated the EPA decides.<sup>31</sup> Other comments and feedback on this question are summarised below.

- **Varying interpretations.** One submitter stated that dismantled e-waste components were a waste product and if products are being sold as working units to be re-used, they are non-waste products.<sup>32</sup> Another submitter stated that waste materials have no commercial value with no ability to be recycled and must be landfilled, while metals are a valuable commodity, therefore, they are not waste.<sup>33</sup>
- **Lack of safety data sheets to determine product characteristics.** One submitter assessed the product's characteristics by reviewing available safety data sheets but noted that these sheets were not always available.<sup>34</sup>

## Most submitters agreed guidance on the distinction between waste and non-waste is needed

Submitters were asked if it would be beneficial to have a process to confirm if a shipment is non-waste. Of the six who answered question 11, five agreed it would be useful<sup>35</sup> and one disagreed.<sup>36</sup> Those who agreed commented it is important to have clear guidance from a regulatory body to ensure stakeholders understand the appropriate processes and practices for handling these materials. One submitter stated their support for the adoption of the Basel Convention Technical Guidelines to include the distinction between waste and non-waste to confirm the status of a shipment.

The submitter who disagreed noted they already had a process in place, where the end-user determines if the product is waste.

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<sup>29</sup> Anonymous business.

<sup>30</sup> Anonymous business (x 2).

<sup>31</sup> New Age Materials Ltd.

<sup>32</sup> Abilities Incorporated.

<sup>33</sup> New Zealand Association of Metal Recyclers.

<sup>34</sup> Anonymous business.

<sup>35</sup> New Age Materials Ltd, Anonymous business, Anonymous industry body, Abilities Incorporated, Anonymous business.

<sup>36</sup> Anonymous business.

## Effect of requiring a permit to import or export all e-waste

Submitters were asked if they had any concerns with New Zealand implementing the Basel Convention e-waste amendments. Of the 12 submitters who answered question 12, seven supported the e-waste amendments, and all agreed the amendments would affect their operations. Comments and feedback are summarised below.

- **Support for proposed amendments.** Three submitters supported the proposed amendments due to the significant human and environmental health risks caused by hazardous e-waste, particularly in vulnerable communities.<sup>37</sup> One submitter noted that the improved tracking of e-waste movements would allow better implementation of measures to minimise harm.<sup>38</sup> A submitter felt the amendments would ensure everyone fulfilled their obligations.<sup>39</sup>
- **Increase compliance costs for new permits.** One submitter noted that, while no application fee is needed to apply for a permit, significant costs are involved in the application process itself, including translation services and administration fees for countries that must provide approval for the shipment.<sup>40</sup> One submitter commented a risk exists that the additional administration burden would make their recycling programme unviable, resulting in e-waste going to landfill.<sup>41</sup>
- **The lengthy permit process causes shipment delays.** Many submitters expressed concern with the already cumbersome and slow permit application process.<sup>42</sup> New Zealand exports typically pass through several countries before reaching their final destination. Each transit country has 30 days to approve a permit, meaning the application process can take at least six months.<sup>43</sup> One submitter noted that applying for permits for low-risk waste, such as printer cartridges, can lead to shipment delays if the permit process is not efficient.<sup>44</sup> Another submitter commented it may slow down the movement of products, causing extra costs to exporters, although businesses will adapt.<sup>45</sup>
- **EPA capacity to process permits.** Two submitters had concerns about the anticipated surge in permit applications and the capacity of the EPA to respond promptly, which could result in shipment delays and additional storage costs to exporters.<sup>46</sup>

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<sup>37</sup> Anonymous individual, WasteMINZ Product Stewardship Sector Group, Freda Woisin.

<sup>38</sup> Anonymous individual.

<sup>39</sup> Abilities Incorporated.

<sup>40</sup> New Zealand Association of Metal Recyclers.

<sup>41</sup> Anonymous business.

<sup>42</sup> New Age Materials Ltd, New Zealand Association of Metal Recyclers, Anonymous business.

<sup>43</sup> New Zealand Association of Metal Recyclers.

<sup>44</sup> Anonymous business.

<sup>45</sup> Anonymous individual.

<sup>46</sup> Anonymous individual, New Zealand Association of Metal Recyclers.

- **Effect on trade relations with Pacific Island nations.** A submitter raised concerns that increased compliance costs could make e-waste trade between the Pacific Islands and New Zealand uneconomical, especially given the already high shipping costs and reliance of the Pacific Islands on New Zealand for reprocessing due to limited infrastructure.<sup>47</sup>
- **Unable to quickly adapt to market demand.** One submitter noted that the requirement to obtain a permit could limit the ability of New Zealand recyclers to adapt to changing international markets, restricting them to specific markets and potentially preventing exports if market conditions shift.<sup>48</sup>
- **Existing guidance is ambiguous.** One submitter suggested a comprehensive product list is needed, to clearly define whether a product is classified as hazardous or a controlled waste, to enable all stakeholders to understand their responsibilities.<sup>49</sup>
- **Environmental impact if permits are declined.** One submitter raised concerns about what happens to the e-waste should exporters not receive permits.<sup>50</sup> They asked what proactive steps are being taken to ensure New Zealand companies are supported to manage e-waste effectively, so the environment is not left to bear the cost. Another submitter commented that putting controls on non-hazardous e-waste may push companies to take an illegal route to avoid extra costs.<sup>51</sup>

A submitter commented:

The passing of this amendment will hopefully slow down current e-waste exports offshore, allowing New Zealand to better control, manage and track our e-waste while simultaneously giving recipient countries (a) more time to prepare for e-waste shipments and (b) more reliable catalogued e-waste shipments.<sup>52</sup>

Another submitter said:

Regulations need to be sufficient to ensure that any products exported are safe to do so and the handling of them is of the highest standards. Regulations should control e-waste so that it does not end up in overseas territories where it negatively impacts their environment and social wellbeing.<sup>53</sup>

One submitter commented:

The term 'waste' is prohibitive to exporting; it creates barriers and compliance burdens that limit exporting potential and devalues the commodity. It limits market availability [because] many countries have strict regulations to prohibit the importation of any material classified as waste.<sup>54</sup>

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<sup>47</sup> New Zealand Association of Metal Recyclers.

<sup>48</sup> New Zealand Association of Metal Recyclers.

<sup>49</sup> Anonymous business.

<sup>50</sup> Anonymous iwi/hapū.

<sup>51</sup> Anonymous individual.

<sup>52</sup> Anonymous individual.

<sup>53</sup> WasteMINZ Product Stewardship Sector Group.

<sup>54</sup> New Zealand Association of Metal Recyclers.

## Future demand for permits to import or export non-hazardous and hazardous e-waste

Submitters were asked if it was likely they would need an import or export permit for e-waste in the next couple of years. Of the five who answered question 13, four answered yes and one answered no. Of the submitters who answered yes, their rationale was that they need to renew their permits every three years.<sup>55</sup> One submitter is heavily reliant on the financial revenue for selling the items.<sup>56</sup> One submitter noted their vendor would need an export permit.<sup>57</sup>

The submitter who answered no commented that they believe their export product does not require a permit.<sup>58</sup>

## Costs and benefits of implementing the Basel Convention e-waste decision

Submitters were asked what the main costs and benefits would be to them of the proposal to implement the Basel Convention e-waste decision. Of the eight who answered question 14, many were concerned with the anticipated increased administration and compliance costs and the length of time it would take to process permits. A few submitters said the decision would promote circular solutions, open the market to smaller traders and maintain New Zealand's reputation and integrity as a Party to the Basel Convention.

Feedback on the costs of implementing the e-waste decision is summarised below.

- **Increased compliance costs.** Three submitters commented that the cost of compliance and length of the permit process would make the cost of recycling various products prohibitive.<sup>59</sup> One submitter noted that service providers would pass the additional compliance costs onto their clients and customers.<sup>60</sup>
- **More e-waste disposed to landfills.** One submitter commented that fewer materials would be recovered, causing recycling rates to drop, landfill disposal to rise and hinder New Zealand's progress towards zero waste goals.<sup>61</sup>
- **Effect on fair and free trade.** One submitter noted it would restrict the ability of New Zealand recyclers to undertake fair and free trade, leading to a reduction in New Zealand export earning potential.<sup>62</sup>
- **Risk of environmental damage due to stockpiling.** One submitter commented it would be likely to increase onshore material stockpiles because stock would be retained while

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<sup>55</sup> New Age Materials Ltd, Anonymous business.

<sup>56</sup> Abilities Incorporated.

<sup>57</sup> Anonymous business.

<sup>58</sup> Anonymous business.

<sup>59</sup> New Zealand Association of Metal Recyclers, Anonymous business, New Age Materials Ltd.

<sup>60</sup> Anonymous business.

<sup>61</sup> New Zealand Association of Metal Recyclers.

<sup>62</sup> New Zealand Association of Metal Recyclers.



permits were applied for, which would increase health and safety risks and potential environmental damage (eg, fires).<sup>63</sup>

- **More complex regulatory framework.** One submitter anticipated an increased administrative workload for the EPA, which would need to be resourced. One submitter commented that, if the EPA were to introduce an application fee, it should be no more than \$1,000.<sup>64</sup>

Feedback on the benefits of implementing the e-waste decision is summarised below.

- **Promote circular economy.** One submitter commented that the decision would prevent greenwashing and promote sustainable circular solutions.<sup>65</sup> Another submitter stated that, while it is important to align with the Basel Convention, New Zealand must ensure exports do not inhibit the New Zealand circular economy and rigorous constraints are in place to promote compliance.<sup>66</sup>
- **Open the market to smaller traders.** One submitter noted that smaller community-based recyclers would be able to trade commodities in a more regulated market and would benefit because they were well positioned to lead by example and trade more.<sup>67</sup>
- **Contribute to more environmentally sound e-waste management.** One submitter commented that implementation of the e-waste decision would reduce greenhouse gas emissions, contribute to healthy living environments and potentially create jobs.<sup>68</sup>
- **More information leading to better policy decisions.** One submitter commented that information sharing, education and clarity for importers, exporters, importing and exporting countries would be enhanced.<sup>69</sup>

## Suggestions to help companies comply with the e-waste decision

Submitters were asked for suggestions on how the Government could help their company comply with the e-waste decisions. The comments and feedback from the eight submitters who answered question 15 are summarised below.

- **Improving the permit process.** One submitter suggested allowing permit holders to 'renew' a permit rather than having to reapply every three years.<sup>70</sup> Another submitter suggested prioritising certified businesses that invest in environmentally sound management technology.<sup>71</sup> A further submitter recommended that exporters who provide evidence their e-waste is hazardous (or not) be given priority for earlier export.<sup>72</sup>

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<sup>63</sup> New Zealand Association of Metal Recyclers.

<sup>64</sup> NZ Telecommunications Forum.

<sup>65</sup> Anonymous business.

<sup>66</sup> WasteMINZ Product Stewardship Sector Group.

<sup>67</sup> Abilities Incorporated.

<sup>68</sup> Anonymous individual.

<sup>69</sup> Anonymous individual.

<sup>70</sup> New Age Materials Ltd.

<sup>71</sup> Anonymous business.

<sup>72</sup> Anonymous individual.

- **More guidance for importers and exporters.** One submitter commented that a comprehensive product list that clearly defines whether a product is classified as hazardous or non-hazardous waste would be beneficial.<sup>73</sup> Another submitter recommended publishing the list of pre-approved environmentally sound management facilities that can be used by all recyclers.<sup>74</sup> One submitter suggested establishing clear guidance as being essential because companies are increasingly focusing on selling, refurbishing and repairing products.<sup>75</sup> One submitter promoted facilitating communication campaigns to raise businesses' awareness of the importance of environmentally sound e-waste management and the new amendments.<sup>76</sup>
- **Impact on the Green Controls.** One submitter advocated for retaining the Green Control Procedure under the Organisation for Economic Co-operation and Development for low-risk e-waste, such as printer cartridges, especially when shipping to Australia.<sup>77</sup> Another submitter asked how the new regulations would affect the Green Control Procedure, specifically GC020.<sup>78 79</sup>
- **Enforcement of non-compliance.** One submitter stated that the enforcement of offences when importing prohibited goods is relatively low when the value of the goods may not be a big enough deterrent to prevent non-compliance and suggested increasing fines and pursuing prosecution where necessary.<sup>80</sup>

## Additional feedback and comments

Additional feedback from submitters fell under the following topics, which are considered out of scope for this consultation.

### General comments

- **Commit to a reduction in the production, import and use of hazardous products.** One submitter suggested introducing incentives or legislation to limit the production and/or importation of hazardous products, to move to less hazardous and more recyclable products, where disposal can be managed onshore without the need for exportation.<sup>81</sup> They further commented that immobilisation or incineration of hazardous waste could reduce the toxicity of waste in Class B landfills or move towards all hazardous waste going to Class A landfills.
- **Support for companies to manage their e-waste.** One submitter raised concerns that e-waste may cause environmental harm if export permits are declined.<sup>82</sup> They

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<sup>73</sup> Anonymous business.

<sup>74</sup> Abilities Incorporated.

<sup>75</sup> Anonymous business.

<sup>76</sup> Anonymous individual.

<sup>77</sup> Anonymous business.

<sup>78</sup> Anonymous business.

<sup>79</sup> Electronic scrap (eg printed circuit boards, electronic components, wire etc) and reclaimed electronic components suitable for base and precious metal recovery.

<sup>80</sup> Noah Kirkham.

<sup>81</sup> Noah Kirkham.

<sup>82</sup> Anonymous iwi/hapū.

recommended conducting a comprehensive study to determine what proactive support can be offered to companies to help them manage their e-waste effectively.

- **Increased environmental pollution due to vape products.** One submitter raised concerns about the proliferation of vape products adding to New Zealand's pollution problem, recommending that the Government has a responsibility to manage unforeseen human health issues as well as environmental health.<sup>83</sup>

A submitter commented:

Ultimately it is our responsibility as a developed nation to take responsibility for our e-waste, as it harms vulnerable people in developing nations who often have no say regarding the matter.<sup>84</sup>

## General product stewardship comments

- **Mandatory product stewardship is urgently needed.** One submitter stated that producers, manufacturers and industry must be held responsible for the full lifecycle of their products rather than leaving it to consumers and individuals.<sup>85</sup>
- **Expand and expedite product stewardship schemes.** One submitter called for the Government to accelerate the development and implementation of product stewardship schemes. They stated that schemes need to target the most hazardous and carbon intensive waste streams and apply the Extended Producer Responsibility tools, such as eco-modulation and eco-design.<sup>86</sup>
- **Design should include viewpoints of multiple stakeholders.** One submitter commented that not limiting scheme design to a specific industry would ensure agility and the best possible outcomes.<sup>87</sup>
- **Lack of a circular economy levy results in environmental harm.** One submitter raised concern about the volume of hazardous and non-hazardous waste illegally dumped in the environment over the years. The submitter supports the use of a circular economy levy to encourage recovery and cited the work of businesses such as Noel Leeming and HP, which operate take-back schemes.<sup>88</sup>

## E-waste product stewardship scheme comments

- **Critical for batteries to be part of the e-waste scheme.** One submitter noted the slow progress in designing a product stewardship scheme and that batteries need to be in scope.<sup>89</sup> They said that given batteries are increasingly integrated into electrical products, such as single-use vapes, end-of-life batteries need to be responsibly managed to reduce potential fires, prevent other environmental harm and reduce emissions.

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<sup>83</sup> Freda Woisin.

<sup>84</sup> Anonymous individual.

<sup>85</sup> Anonymous iwi/hapū.

<sup>86</sup> WasteMINZ Product Stewardship Sector Group.

<sup>87</sup> WasteMINZ Product Stewardship Sector Group.

<sup>88</sup> Freda Woisin.

<sup>89</sup> WasteMINZ Product Stewardship Sector Group.

- **Mandatory e-waste export targets.** One submitter suggested targets be put in place for whole equipment and its parts, with the targets steadily tightened to help drive New Zealand's e-waste recovery sector.<sup>90</sup>
- **Investment in onshore infrastructure.** One submitter stated that New Zealand needs to invest in onshore infrastructure to process more e-waste generated here for local reuse and repair.<sup>91</sup>
- **Restrict importation of e-waste.** One submitter suggested that, if New Zealand is generating more e-waste, consideration should be given to reducing the importation of e-waste from other countries.<sup>92</sup>
- **Support the right to repair.** One submitter recommended setting legislation to require products to be repairable.<sup>93</sup>

## Large battery product stewardship scheme comments

- **Lack of financial management for legacy batteries.** One submitter raised concerns about the short-sightedness of the financial model for the large battery product stewardship scheme, which states recycling for imported batteries is 20 years away.<sup>94</sup> They suggested the model should include a value for the volume of legacy batteries in the New Zealand market that are at end-of-life now.
- **Chemistry and weight-based battery stewardship fee.** One submitter commented that the market already provides a chemistry and weight-based price to recycle batteries.<sup>95</sup> They stated that battery chemistries are evolving quickly, so we should be planning for today's costs and not the projected 20-year lifespan.

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<sup>90</sup> WasteMINZ Product Stewardship Sector Group.

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<sup>92</sup> WasteMINZ Product Stewardship Sector Group.

<sup>93</sup> WasteMINZ Product Stewardship Sector Group.

<sup>94</sup> Anonymous business.

<sup>95</sup> Anonymous business.

# Appendix: Questions

These questions appear throughout the consultation document.

## Questions

1. Which e-waste activities does your company undertake?
2. Do you anticipate starting or growing onshore re-processing facilities? If yes, for what type of e-waste?
3. If your company is involved in importing and/or exporting e-waste, what types of e-waste (eg, printed circuit boards) do you import and/or export?
4. If your company is involved in importing and/or exporting e-waste, what weight of each product or waste do you import and/or export per year?
5. If your company is involved in importing and/or exporting e-waste, what is the frequency of your shipments (eg, what is the number of shipments) per year?
6. If your company is involved in exporting e-waste, which countries do you currently export e-waste to? Do you intend to export e-waste to any other countries, and if so, which ones?
7. If your company is involved in importing and/or exporting e-waste, do you import and/or export waste directly or do you go through someone else (eg, a broker, a commodities trader or a freight forwarder)?
8. If your company is involved in importing and/or exporting e-waste, which customs (HS) codes do you use for the e-waste shipment?
9. If you are involved in product stewardship for e-waste in New Zealand, do you think product stewardship will change export and import patterns for e-waste? How?
10. How do you currently decide whether a shipment is waste or non-waste?
11. Do you think it would be useful to have a process in place for confirming that a shipment is non-waste?
12. Do you have any concerns about New Zealand implementing the Basel Convention e-waste amendments to require a permit for all e-waste? Please explain.
13. Do you think you are likely to need an import or export permit for hazardous and/or non-hazardous e-waste over the next couple of years? If yes, how many permits are you likely to need and what is the final destination of the e-waste?
14. What do you think would be the main costs and benefits for you of the proposal to implement the Basel Convention e-waste decision in New Zealand?
15. Do you have any suggestions for us that could help your company comply with the e-waste amendment?