



Distilled Spirits Aotearoa (NZ) Incorporated

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Hon David Parker Minister for the Environment

Delivered via email: *David.Parker@parliament.govt.nz*

22 September 2022

Subject: Support for consideration of EPR scheme design for glass

Dear Minister Parker

We have reviewed the report commissioned by the Glass Packaging Forum from Grant Thornton "Product stewardship scheme design for container glass," showing how product stewardship could work for container glass in Aotearoa New Zealand.

We believe the report thoroughly addresses the core issues related to glass recovery and recycling rates in New Zealand and takes into consideration how emissions would be impacted by system change.

Distilled Spirits Aotearoa is an industry organisation representing almost 100 New Zealand distilleries. Our members are part of an emerging industry, in touch with the views and aspirations of our New Zealand consumers. As such we have an extreme concern about the environmental outcomes for our glass packaging.

We request that Ministry for the Environment and you as Minister take the contents of the report under consideration when considering a fair and effective system for container glass.

In particular we draw your attention to the features and outcomes of Grant Thornton's scheme design:

- The EPR is an overall more cost-effective scheme, which will reduce the cost impact on businesses and consumers (compared to a CRS). In particular, the Grant Thornton EPR model has a fairer weight-based fee. The EPR is designed around a fee per kilo, rather than per container. For our small producers of premium spirits, the EPR scheme would equate to \$184-220 per tonne which is much fairer than the CRS at \$438 - \$476 per tonne (minimum).
- The EPR is a collection system that focuses on glass quality and therefore more circular outcomes – most importantly for our distillers and our consumers - doing the right things right, first time.
 - I. The EPR has been shown to have an increased recovery rate of 90% and a bottle-to-bottle recycling rate of 87% by year five.
 - II. The EPR will have less than half the emissions from glass compared to both the status quo and the proposed CRS.

We look forward to your response

Yours faithfully

A handwritten signature in black ink, appearing to read "Richard Wilson". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Richard Wilson

Chair – Distilled Spirits Aotearoa (NZ) Inc