

**Submission on the Ministry for  
the Environment's Proposed  
product stewardship  
regulations: Tyres and large  
batteries**

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## Introduction

1. Nelson Marlborough Health (Nelson Marlborough District Health Board) (NMH) is a key organisation involved in the health and wellbeing of the people within Te Tau Ihu. NMH appreciates the opportunity to comment from a public health perspective on the Ministry for the Environment's *Proposed product stewardship regulations: Tyres and large batteries*.
2. NMH makes this submission in recognition of its responsibilities to improve, promote and protect the health of people and communities under the New Zealand Public Health and Disability Act 2000, the Health Act 1956, and the Biosecurity Act 1993.
3. This submission sets out particular matters of interest and concern to NMH around environmental and public health matters.

## General support

4. NMH was pleased to that National Environmental Standard (NES) for the Outdoor Storage of Tyres has recently come into effect. NMH strongly supports the introduction of a stewardship scheme that will complement the new NES. The actions will reduce the risk of environmental harm from the stockpiling of waste tyres and support waste tyres being channelled into more sustainable recycling and disposal options.
5. NMH notes that during tyre recycling processes, the textile component of tyres can create a build-up of dust and fibre in machinery and the atmosphere which can have subsequent health issues for operators<sup>1</sup>. This will need to be managed accordingly as part of tyre recycling.
6. NMH also supports the introduction of a large battery stewardship scheme that is designed to keep large batteries in use for as long as possible. Commercial electric vehicles' batteries are not designed to be easily, safely and cost effectively disassembled, tested and remanufactured or recycled<sup>2</sup> however many of these products contain materials such as rare metals that could be reused. Batteries contains toxic substances such as lead, cadmium and mercury which can leach and pollute the environment.<sup>3</sup> Improving the collection, treatment and recycling of electronics at the end of their life is essential for improving environmental management and enhancing resource efficiency. This is particularly important as the number of EVs in the community increases, especially in the public sector.

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<sup>1</sup> European Tyre & Rubber Manufacturer's Association (2015) End-of-life Tyre REPORT 2015 <http://www.etrma.org/uploads/Modules/Documentsmanager/elt-report-v9a---final.pdf>

<sup>2</sup> Mossali, E., Gentilini, L., Merati, G., (2020) Methodology and Application of Electric Vehicles Battery Packs Redesign for Circular Economy. *Procedia CIRP* 91 (2020) 747–751

<sup>3</sup> [https://ec.europa.eu/environment/waste/weee/index\\_en.htm](https://ec.europa.eu/environment/waste/weee/index_en.htm)

7. However, NMH would like to emphasise the importance of ensuring that initiatives involving sustainable alternatives take into account smaller provinces. For example, enabling the recycling of used tyres by providing adequate transportation linkages to the larger centres where the sustainable options will be based.

#### *Recommendation*

8. That initiatives which support more sustainable recycling and disposal options take into account and provide for smaller provinces.

#### **Conclusion**

9. NMH thanks the Ministry for the Environment for the opportunity to comment on the proposed product stewardship regulations: Tyres and large batteries.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Lexie O'Shea', with a stylized flourish at the end.

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