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Tēnā koe,

Submission from the Manawatū District Council on the Proposed Stewardship Regulations for Agrichemicals, their Containers and Farm Plastic

The Manawatū District Council (MDC) thanks the Ministry for the Environment for the opportunity to provide feedback on the proposed product stewardship regulations to enable a national take-back and recycling scheme for agrichemicals, their containers and farm plastics.

The Manawatū District is a predominantly rural area in the lower North Island, with agriculture forming the core of its economy and community identity. The district is characterised by highly productive pastoral farming, with dairy, sheep, and beef operations making up a significant proportion of land use and economic activity. In addition to pastoral farming, the district supports cropping, horticulture, and other intensive land uses that collectively underpin local employment and GDP.

Agricultural productivity in Manawatū relies on the use of agrichemicals—including pesticides, herbicides, and fertilisers—to maintain crop yields and manage pests and diseases. The widespread use of these products is typical of intensive farming systems and is accompanied by the use of a range of farm plastics such as chemical containers, silage wrap, and packaging. These materials are essential for modern farm operations but present ongoing waste management and environmental challenges.

Recent waste assessments indicate that rural properties in Manawatū generate considerable volumes of plastic waste annually, much of which is currently disposed of or burnt on-farm due to limited recycling infrastructure. According to the 2022 Waste Assessment data on rural farm waste yearly estimates, plastics (which include containers, drums, silage wrap, netting, mulch film and crop cover) accounted for 6801 tonnes of the overall 16,843 tonnes. The management of used agrichemical containers and farm plastics is a recognised issue in the Manawatū District, with risks of improper disposal including contamination of soil and water resources.

MDC's most recent farm waste collection 1-day event achieved significant results, including diversion of 24.5 tonnes of bale wrap and silage covers, 1.4 tonnes of 0-60L containers, 42 200L drums, and a significant volume of small seed, feed and fertiliser bags. The very high demand for the event embedded our understanding of the need for ongoing farm waste events and Agri-waste partnerships in our district.

Feedback on Current Scheme

While the Agrecovery scheme currently provides free drop-off options for agrichemical containers from participating brands-including many of the most commonly used products in the Manawatū- there remains a significant challenge in achieving high levels of farmer participation. The infrastructure for container drop-off is already in place in the district, yet uptake is limited, largely because participation remains voluntary for farmers. This means that, despite the scheme's availability, many eligible containers are not being returned through official channels. As a result, the environmental benefits of the scheme are not fully realised, and some farmers may continue to resort to less sustainable disposal practices.

During the MDC farm waste collection event, key trends of agri-container brands who don't participate in the Agrecovery scheme also became apparent. The requirement for containers to be triple rinsed and well drained to be able to be recycled was also a limitation during the event for farmers attending. In addition, many farmers had very old containers which either did not include participation in the Agrecovery scheme, or were not of the required condition for recycling.

A similar issue exists with the Plasback scheme for bale wrap and silage pit covers. Although this scheme enables the recycling of agricultural plastics, there are notable barriers to participation, particularly for smaller or time-constrained farming operations. The Plasback scheme currently requires an initial set-up cost, ongoing purchases of collection bags, and a fee for on-farm pick-up. It is the view of MDC after discussions with local farmers that these costs can deter use of the service, especially when compared to the convenience of traditional disposal methods such as burning or burying plastics - a practice that remains prevalent in rural areas, as highlighted in sector reports and council waste assessments. There have also been instances where contractors assigned to do pickups within the Manawatu omitted collections of some properties which resulted in farmers bringing full plasback bags of bale wrap that had accumulated over six months and not been picked up.

To achieve meaningful improvements in on-farm plastics recovery, it is critical that any new or expanded product stewardship or EPR schemes prioritise convenience and accessibility for farmers. In the Manawatū, many farmers are time-poor and may be reluctant to make additional trips into town, even if drop-off is free. Evidence from Agrecovery's own reporting and the Ministry for the Environment's 2023 Waste Strategy consultation (MfE, 2023) highlights that voluntary participation and logistical barriers are key reasons for low scheme uptake and ongoing on-farm burning and burial of plastics.

The WasteMINZ "Farm Plastics" resource (WasteMINZ, 2022) also identifies convenience and cost as critical drivers of farmer behaviour. Key mitigations for these risks would be drop-off/collection points near rural areas, or centralising drop-off/collection points to areas where farmers frequently visit (e.g. Agri-business locations or the Saleyards). MDC notes that there are other collection points that are not fully utilised such as PGG Wrightson, Farmlands and FarmSource in Feilding.

For any new scheme to be successful in the Manawatū and similar districts, it must be as convenient as possible for farmers - ideally offering on-farm collection at no direct cost. Without these practical considerations, there is a risk that the status quo will persist, undermining the environmental objectives of the proposed legislative amendments.

Collaboration with local Councils to explore opportunities for utilising Council-owned consolidation points may assist MfE to achieving a good rural spread of collection points. The Tyrewise scheme provides an excellent example of an incentive based model for potential collection points to participate.

Cost Implications of Stewardship Fees and Impact on Profitability

Manawatū District Council recognises that the proposed product stewardship regulations could bring important benefits to farmers in the Manawatū District. In particular, the introduction of or low-cost take-back service for agrichemical containers and farm plastics has the potential to reduce the costs and environmental risks currently associated with on-farm disposal.

At the same time, the Council notes that stewardship fees, which producers and importers will pay and are likely to be passed on to farmers, represent an additional cost. Although the proposed fees-estimated at around 1–2 percent of the product cost-are relatively modest on an individual product basis, there is some concern that, when aggregated across multiple products and large-scale farming operations, these costs could become more noticeable.

Therefore, 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.

MDC 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.

Coverage and Management of Bulk/Non-Residual Agrichemicals

MDC wishes to draw attention to a specific issue regarding the scope of the proposed Green-farms scheme. As outlined in the discussion document (MfE, 2025, p. 8), the stewardship scheme and associated fees will cover the collection and disposal of residual agrichemicals contained within returned containers (up to 1,000 litres). However, the disposal of non-residual or bulk agrichemicals-such as surplus, expired, or deregistered chemicals not contained within these containers-will continue to be managed through Agrecovery's existing user-pays service.

This distinction potentially raises several practical concerns for our farming community. Firstly, the continuation of a user-pays approach for bulk or non-residual agrichemicals means that farmers will still bear a direct financial burden when disposing of these substances. While the stewardship scheme will make it easier and more cost-effective to dispose of containers and residual chemicals, the need to pay separately for the disposal of bulk chemicals could discourage proper disposal, particularly for those with legacy stocks or those operating under financial constraints.

Secondly, the dual system may create confusion among farmers regarding which agrichemical wastes are eligible for free take-back and which are not. Without clear and targeted communication, there is a risk that some farmers may inadvertently attempt to return bulk chemicals through the stewardship scheme, or worse, resort to inappropriate disposal methods such as on-farm stockpiling or burial. This risk is not theoretical: at the recent farm waste events in our district, we observed a significant number of farmers bringing in drums and other ineligible materials, only to be turned away. Such experiences not only create confusion but also lead to frustration and angst among participants, potentially discouraging future engagement with the scheme. This could undermine the environmental objectives of the scheme, particularly for our district where the scale of agricultural activity is significant.

Finally, the exclusion of bulk/non-residual agrichemicals from the stewardship scheme may be perceived as an incomplete solution by the farming sector. Farmers are likely to expect a comprehensive, one-stop service for all agrichemical waste streams, given the introduction of new fees and regulatory obligations. If bulk chemical disposal remains outside the scope of the scheme, there is a risk that confidence and participation in the scheme could be affected.

MDC therefore recommends that the Ministry ensures clear, practical communication to farmers and agri-businesses about the scope of the scheme, including guidance on how to identify, store, and dispose of different types of agrichemical waste. MDC recommends that, alongside broader communication efforts, the Ministry require all agrichemical containers to display clear, standardised labels indicating how to dispose of them through the stewardship scheme. Labelling should be highly visible and easy to understand, similar to the current Agrecovery system. This approach is especially important for rural farmers and contractors, who may not access digital communications regularly. By providing disposal instructions directly on the product, the scheme can ensure that all users receive essential guidance at the point of use, supporting correct disposal and higher scheme participation. We also encourage the Ministry to consider options for integrating bulk/non-residual agrichemical disposal into the stewardship scheme in the future, particularly if monitoring indicates ongoing environmental risk or low uptake of user-pays services. Ongoing evaluation of the scheme's effectiveness in managing all agrichemical waste streams will be critical for achieving the intended environmental outcomes.

Improving Bale and Silage Wrap Management-Cleanliness, Processing Solutions, and Domestic Capacity

Effective stewardship of bale and silage wrap faces two critical challenges: the high contamination levels of collected material and the current reliance on offshore processing. 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 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.

MDC notes that the burden of cleanliness of bale and silage wraps cannot practicably rest solely on primary producers. The design of the product stewardship scheme must incentivise or enable processing solutions that can accommodate higher contamination levels. Investment in advanced washing and pre-processing infrastructure could reduce the need for perfectly clean input material, making recycling more accessible and realistic for farmers operating in challenging conditions.

Further, most collected bale and silage wrap is exported for processing, which exposes the scheme to significant risks. International markets for waste plastics are volatile and subject to sudden regulatory changes, as seen with recent restrictions in key importing countries. To ensure long-term resilience, the Ministry should prioritise the development of domestic processing capacity for farm plastics. This could include 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. Building this capacity within New Zealand would reduce reliance on overseas markets, create local employment opportunities, and contribute to a circular economy for agricultural plastics.

Consultation Questions

Responses to the Consultation Document Questions

1. *Do you agree with the description of the problem posed by agrichemicals, their containers, and farm plastics?*

Yes. 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.

2. What other information should we consider in analysing the problem?

It would be useful to consider data on the volume and contamination rates of collected farm plastics, particularly bale and silage wrap, as contamination is a key barrier to recycling. Information on the current and projected capacity for domestic processing of farm plastics, and risks associated with reliance on offshore processing should also be considered as well as evidence of the effectiveness of education and engagement initiatives in improving collection and cleanliness rates.

3. a) *Do you support the provisional name 'Green-farms' for the new scheme?*

Yes. The name is clear, purpose-driven, and aligns with the scheme's environmental objectives.

b) *If you have an alternative suggestion, please specify.*

Other suggestions could be 'FarmWise Stewardship Scheme" which highlights smart and responsible management of agrichemical waste and aligns with the TyreWise scheme.

4. *Do you agree the options presented (Option 1 – Introduce WMA regulations; Option 2 – No action) are the appropriate ones to consider?*

Yes. Option 1 is necessary to create a level playing field, address free-riding, and ensure comprehensive coverage. The voluntary approach has not delivered sufficient outcomes.

5. *Do you support a national take-back and recycling scheme for agrichemicals, their containers, and farm plastics?*

Yes. A regulated, national scheme is essential for high collection rates, environmental protection, and to support a circular economy for agricultural plastics.

6. *a) Do you support the proposal to only allow sale of the following products in accordance with an accredited product stewardship scheme?*

- Agrichemicals in containers and drums of ≤1,000 litres: Yes

- Plastic bale wrap and silage sheet: Yes

- Small plastic bags (≤40kg): Yes

- Bulk woven polypropylene bags (>40kg): Yes

This approach ensures all major sources of farm plastic waste are covered and managed responsibly.

b) If you answered no for any category, what changes could we make to gain your support?

Not applicable.

7. a) 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?

Yes, for all listed product groups. Stewardship fees internalise end-of-life costs and ensure sustainable scheme funding, however, please note the concerns highlighted in the earlier sections of the document.

b) *If you answered no for any category, what changes could we make to gain your support?*

Not applicable.

8. *Do you think that any particular products in the four proposed categories should be exempt from regulation?*

No. Exemptions risk undermining scheme integrity and creating loopholes that could be exploited, reducing environmental benefits.

9. *Are you aware of any imported products in the four categories that are subsequently re-exported in the same packaging without being used in New Zealand?*

No expertise of Council in this space, but the scheme should monitor for this scenario and consider mechanisms for fee refunds or exemptions if it arises.

10. *Do you support the inclusion of the following out-of-scope products in a regulated scheme in future, subject to further government consideration?*

Yes. Including irrigation piping, shrink/pallet wrap, tunnel house covers, wool fadges, potted plant pots, vineyard netting, hail netting, and other agricultural plastics would further reduce plastic waste and support circular economy objectives.

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 (e.g., that the collection network covers enough of the country)?*

Yes. Accessibility and convenience are critical for high participation, especially in rural and remote areas.

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?*

Yes. Cost recovery for monitoring is appropriate to ensure robust oversight and scheme accountability.

13. a) *Do you agree with the description of the expected impacts of Option 1: Introduce WMA regulations?*

MDC broadly agrees. Regulations will drive higher collection rates, reduce environmental harm, and support investment in domestic processing capacity.

b) Are you aware of other data or information that would help assess the impacts of this option?

Yes. Data on contamination rates, processing losses, and the economic benefits of local processing infrastructure would strengthen the impact assessment.

14. *a) Do you agree with the description of the expected impacts of Option 2: No action (maintain the voluntary approach)?*

Yes. The voluntary approach has not delivered sufficient coverage or outcomes, and the free-rider problem persists.

b) Are you aware of other data or information that would help assess the impacts of this option?

Yes. Information on the proportion of plastics currently being stockpiled, burnt, or buried would provide a clearer picture of the ongoing risks.

15. *If you had to take part in the proposed regulated scheme, how would this affect your business?*

Not applicable

MDC strongly supports the Ministry's commitment to establishing robust product stewardship regulations for agrichemicals, their containers, and farm plastics. We believe that a successful scheme must be practical, accessible, and responsive to the realities of modern farming, particularly in rural districts like ours where agriculture is the economic backbone.

To reiterate, it is essential that the scheme prioritises convenience for farmers, ensures clear and consistent communication-including on-product labelling-and actively addresses barriers to participation, such as cost, contamination, and limited processing capacity. We urge 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.

By working collaboratively and designing a scheme that is both ambitious and grounded in practical experience, New Zealand can set a benchmark for sustainable agricultural waste management that protects our land, water, and rural communities for generations to come.

Yours sincerely,

Helen Worboys, JP
Mayor