

20 May 2022

Ministry for the Environment  
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Submitted via Citizen Space

Dear Sir/Madam

### **Kāpiti Coast District Council: Submission on “Transforming Recycling”**

Kāpiti Coast District Council (Council) appreciates the opportunity to submit on the *Te panoni i te hangarua: Transforming Recycling* consultation. Council partially supports the submission made by the Territorial Authorities’ Officers Forum (TAO Forum) from WasteMINZ as this submission largely reflects council’s view on the proposed Container Returning Scheme and the improvements that kerbside collections require.

However, in *Part 2: Te whakapiki i te hangarua paeara ā-kāinga: Improvements to household kerbside recycling* Council disagrees with the comments made in the TAO Forum’s submission on questions 42, 43 and 64, as outlined below.

#### **Question 42: Do you agree that all councils should offer a weekly kerbside food scraps collection to divert as many food scraps as possible from landfills?**

Council disagrees with the TAO Forum’s comment that all councils should offer a kerbside food scrap collection, as we believe that there is more than one way to prevent food scraps from ending up in landfill, and that a decentralised model has greater community outcomes with greater carbon efficiency.

Council has successfully reduced its carbon footprint over the past 10 years and questions how decreasing landfill emissions can be justified by increasing transport emissions as certainly in the Wellington Region transport emissions are significantly higher than emissions from well managed landfills. Emissions associated with introducing another type of collection and transport to an out of district or regional composting facility will likely increase overall emissions. In Council’s view it’s an omission this hasn’t been considered in this consultation.

With a focus on reduction and re-use we actively support and fund decentralised community food scrap options.

There are three groups/businesses that run decentralised food scrap collections in our district currently, at various stages of operation:

1. Pae Cycle (modelled on Kai Cycle) - active and collecting from households and businesses in Paekākāriki.

2. Organic Wealth / Earth Starch Solutions partnership - active and collecting from cafés and households across the district.

3. The Kai Ora Initiative - recently funded and establishing a new larger site, not yet operating at a large scale.

Council has supported the establishment of these groups/businesses via our Waste Levy Grants.

Since our Waste Levy Grants were established in 2010, we have supported 90 community groups, schools, and businesses to implement organic waste diversion projects. In addition, several community gardens around the district/accept collect food scraps from nearby businesses and allow garden group participants to drop their household food scraps into their composts.

Most kindergartens, schools and kura across the district have been funded through grants to establish composting areas on their grounds. A number of these education institutes have an option for whānau to drop-off their household food scraps in a bucket-cycling format (e.g. the Opara Initiative from Te Kura Kaupapa Māori o te Rito).

We envision that these small-scale compost processing hubs could form a network so that residents all over the district have access to a low carbon, locally processed compost collection that in turn grows food, increasing community resilience, food security and directly benefiting the community where the food scraps are collected.

Furthermore, in 2021 council launched the Love your Compost programme that assists residents to divert food scraps from landfill. The programme includes a number of resources on different home composting systems, in multiple formats (interactive workshops, online resources, market visits etc.), and financial support in the form of a voucher towards a home composting system or collection service of choice. We believe that widespread home composting, in conjunction with a decentralised collection option, is the key to a low carbon food scrap diversion model, whilst also achieving thriving urban gardens and increased soil health.

Council strongly supports the diversion of food scraps from landfill but does not believe that a council lead collection service is the only way to achieve this. Other models, depending on the community's needs, should be allowed for.

**Question 43: Do you agree that these collections should be mandatory in urban areas (defined as towns with a population of 1000 plus) and in any smaller settlements where there are existing kerbside collections?**

We disagree with the TAO Forum's comment that food scrap collections should be mandatory in urban areas for reasons stated in our reply to question 42.

**Question 64: Should all councils offer household kerbside recycling services?**

We disagree with the TAO Forum's comment that all councils should offer a council lead kerbside recycling service for the reasons stated in our reply to question 42.

Council has been delivering on its Waste Minimisation Act obligations via a successful waste collectors and operators licensing system since 2012.

All collection services (rubbish, recycling and greenwaste) are delivered by licensed private collectors with an on-going high satisfaction rate of 87%-92%, based on our quarterly resident surveys.

All private collectors must be licenced to operate within Kāpiti and are required to comply with several conditions to operate. Most notably, they must provide a combined collection of rubbish and recycling within the urban residential zones of the district (set by council) and provide council with collection data.

Locally we now have an open market that provides competitive collection services and council is provided with quality data to track progress towards WMMP goals. The mechanism that collectors must provide a combined rubbish and recycling collections means that there is no opt-out of recycling option for residents, and Council has avoided the issue of low recycling uptake that some other areas with private led collections experience.

This highly competitive private market has also led to a greater range of collection options being available to Kāpiti residents. A range of rubbish bin sizes (80L to 240L) as well as different collection frequencies (ranging from weekly, fortnightly to pay as you throw) is available.

The smaller rubbish bin sizes and less frequent collection services are cheaper, thus incentivising recycling, composting and reducing waste overall. If council is required to introduce a rates funded collection model, we would be unable to match the current market prices nor the range of service options that the system provides. The wide choice that residents currently have would also be taken away.

It continues to be Council's view that waste services should be based on the user-pays principle by making it visible to the user in the most direct manner - how much kerbside collections and waste disposal costs, rather than making these cost part of an annual rates bill. As is well known, direct cost to a household is probably the best driver for behaviour change. A good example of this is the introduction of water meters by Council which has led to a 29% reduction in water use.

Council agrees that urban households should have access to a kerbside recycling collection but does not believe that a rates-funded council run model is the only way to achieve an effective and widely used service. Other models, such as our licencing system, should be allowed for.

Should you have any queries regarding the content of this document please contact Nienke Itjeshorst, Sustainability & Resilience Manager directly on (027) 5555 687 or by email [nienke.itjeshorst@kapiticoast.govt.nz](mailto:nienke.itjeshorst@kapiticoast.govt.nz)

Yours sincerely



Sean Mallon

ACTING CHIEF EXECUTIVE  
Te Tumuaki Rangatira



**Territorial Authorities' Officers Forum submission on *Te panoni I te hangarua: Transforming Recycling* Consultation Document**

Tēnā koe,

Thank you for providing the Territorial Authorities Officers (TAO) Forum the opportunity to submit on *Te panoni I te hangarua: Transforming Recycling*.

Territorial Authorities (TAs) support the need to transform recycling and accelerate the shift to a circular economy, to change waste behaviour and focus attention up the waste hierarchy. In general, the Forum support all three proposals outlined in this consultation. The Forum provide further recommendations to ensure the proposed changes meet the needs of their respective communities. This submission is written by the TAO Forum steering committee and represents views and input from most Councils. Due to the short consultation timeline, consensus and feedback from all Councils has not been possible and consequently responses on the detail will vary by individual Councils.

The Forum would like to thank the Ministry for including objectives recommended in the Local Government Manifesto 2020 and look forward to working with the Ministry to bring about these changes.

Regards,

The TAO Forum Committee

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Submitter type	Industry Organisation

WasteMINZ is the largest representative body for the waste, resource recovery and contaminated land management sectors within Aotearoa New Zealand. The TAO Forum was established to create consistency and efficiency of service amongst territorial authorities through sharing knowledge and best practice around waste minimisation, recycling and resource recovery.

**TAO Forum Committee Members**

- Andre Erasmus (Kawerau District Council)
- Angela Atkins (Hastings District Council)
- Eilidh Hilson (Christchurch City Council)

- Jennifer Elliot (Wellington City Council)
- Kimberley Hope (New Plymouth District Council)
- Kirsty Quickfall (Hamilton City Council)
- Sophie Mander (Queenstown Lakes District Council) – Chair

## Key Considerations

The TAO Forum (the Forum) endorses investment that enables waste reduction behaviours from the outset. The Forum supports widespread focus, attention and decision making aligned with the waste hierarchy and looks forward to seeing comprehensive reporting of effort, funding and the positive outcomes across all the different levels of the hierarchy.

We have noted a number of key gaps that will need support to help transform recycling in Aotearoa New Zealand:

- **Investment in Infrastructure.** Investment in onshore and local infrastructure for processing of recovered materials, in particular, plastics, paper, organics and building materials. All investment opportunities should support New Zealand's transition to a circular economy.
- **Timelines.** Council Waste Minimisation and Management Plan's will need to be reviewed and new plans adopted by communities and their respective Councils. TAs will need sufficient time to allow for the review, community consultation and incorporation into Ten Year Plan budget cycles.
- **Legislation.** To achieve success, it is vital that the Government legislate and enforce change to provide communities, Councils and the business sector the greatest chance for success.
- **Regional Councils.** The roles and responsibilities to our sector across regional and local Councils vary across the country. Support and guidance is needed to forge greater collaboration in delivering the proposed changes. As a consenting and enforcing body, regional councils need to anticipate an increase in the planning and consenting of new facilities supporting the transformation of recycling and move to a circular economy. Local Councils and their communities should not be hindered in achieving waste minimisation goals due to planning constraints. Where relevant, consideration of this should be included in the Resource Management Act reform and development of new Regional Plans and Policy Statements.
- **Behaviour Change.** An innovative, comprehensive, national education campaign across multiple platforms must be designed and delivered in collaboration with TAs to achieve the greatest buy-in. This will require a multimedia approach and web based and print resources to enable speedy uptake and understanding of the upcoming changes.
- **Reducing Food Waste.** A strong focus is needed on reducing food waste at source and not just moving food waste from a waste disposal bin to an organics diversion bin.

Simply diverting away from landfill does not support reduction in emissions from up the food production chain.

## **TRANSFORMING RECYCLING SUBMISSION QUESTIONS**

### **PART ONE: Container Return Scheme**

#### **1. Do you agree with the proposed definition of a beverage?**

Yes.

#### **2. Do you agree with the proposed definition of an eligible beverage container?**

Yes.

#### **3. Do you support the proposed refund amount of 20 cents?**

Yes.

20 cents is the minimum refund the Government should consider. The Forum recommends flexibility to review and increase the refund amount to ensure the price point is achieving the best outcomes.

#### **4. How would you like to receive your refunds for containers? Please answer all that are relevant and select your preference? – cash; electronic funds transfer (e.g. through a scheme account or mobile phone app); vouchers (for cash or equivalent value product purchase); donations to local community organisations/charities; access to all options; other (please specify)**

All options should be available with return points able to choose which option suits best. Further support and guidance on how TAs will receive funds associated with material received through kerbside collections and public place litterbins is required.

#### **5. Do you support the inclusion of variable scheme fees to incentivise more recyclable packaging and, in the future, reusable packaging?**

Yes.

The Forum supports eco-modulation/variable scheme fees to drive product packaging design and choices towards reusable and/or recycled packaging. Hard to recycle packaging should be phased out.

#### **6. Do you agree with the proposed broad scope of beverage container material types to be included in the NZ CRS?**

Yes.

The Forum supports a fully comprehensive beverage container return scheme that includes all materials and beverage types. The scheme must include all beverage containers sold in New Zealand.

**7. If you do not agree with the proposed broad scope (refer to Question 6), please select all container material types that you think should be included in the scheme. – glass; plastic (PET, HDPE, PP, and recyclable bio-based HDPE and PET); metal (e.g. aluminium and non-ferrous metals such as steel, tinplate and bimetals); liquid paperboard**

NA

**8. Do you support a process where alternative beverage container packaging types could be considered on case-by-case basis for inclusion within the CRS?**

Yes.

The Forum supports this approach with strict criteria ensuring minimal harm to the environment. The decision-making process must be governed by an independent managing agency and not left to an industry body alone, and each proposed new beverage container type must be assessed on a case-by-case basis. The Forum supports flexibility in the case of a new material or packaging type that can prove itself in terms of circularity and low impact on the environment.

**9. Do you agree with the proposal to exempt fresh milk in all packaging types from the NZ CRS?**

No.

For the scheme to be successful, all beverage containers need to be included. This makes the messaging clear and consistent for households, business and the wider community.

**10. Do you support the Ministry investigating how to target the commercial recovery of fresh milk beverage containers through other means?**

No.

For the NZ CRS to be successful, all beverage containers need to be included. Creating an alternative scheme for some products is inefficient and adds additional time and costs.

**11. Do you support the Ministry investigating the option of declaring fresh milk beverage containers made out of plastic (eg, plastic milk bottles and liquid paperboard containers) a priority product and thereby including them within another product-stewardship scheme?**

No.

All beverage containers, including fresh milk beverage containers, need to be included in the NZ CRS. Establishing an alternative scheme will lead to confusion and consequent loss of materials and/or contamination.

**12. We are proposing that beverage containers that are intended for refilling and have an established return/refillables scheme would be exempt from the NZ CRS at this stage. Do you agree?**

No.

The Forum supports an approach where refillables can opt into the NZ CRS. Excluding refillables is likely to deter refillable schemes, increase single use and confuse the public. Including refillables would allow the burgeoning refillables market to access the return network of the NZ CRS. The network, infrastructure and systems need to accommodate both reusable and single use items.

**13. Should there be a requirement for the proposed NZ CRS to support the New Zealand refillables market (eg, a refillable target)?**

Yes.

Targets should be set for producers and retailers and integrated into the CRS from the start with longer lead times to allow for transformation. This will help future-proof provision for refillable containers.

**14. Do you have any suggestions on how the Government could promote and incentivise the uptake of refillable beverage containers and other refillable containers more broadly?**

Yes.

Government leadership and investment is integral to the success of uptake and ongoing use of refillables. It is important that the government does not underestimate the investment required in this space, supporting policy must be imbedded alongside binding refillables targets and consequences for industry failing to meet those targets.

From the onset the infrastructure required must be designed and built to accommodate refillable systems and enable easy access for all New Zealanders.

In line with the Plastics Innovation Fund, Government should provide investment in washing facilities for refillables and pilots to demonstrate reuse models.

**15. Are there any other beverage packaging types or products that should be considered for exemption?**

No

**16. Do you agree that the size of eligible beverage containers would be 3 litres and smaller?**

No.

The Forum supports inclusion of containers above 3 litres including data reporting. The mechanism for retrieval may be different but the process behind the scheme should be the same.

**17. Do you think that consumers should be encouraged to put lids back on their containers (if possible) before they return them for recycling under the scheme?**

No.

Loose lids collected kerbside disrupt the operation of MRFs leading to downtime and contaminated product. Best practice has shown that lids off reduces contamination from old



food products. The Forum recommends consistent messaging with kerbside collection practice and the many education campaigns citing 'no lids' messaging. The redesign of lids and containers should be supported to ensure future packaging incorporates the lid as a non-separable component to the container.

**18. Do you agree that the scheme should provide alternative means to capture and recycle beverage container lids that cannot be put back on the container? If so, how should they be collected?**

Yes.

If reverse vending machines are used for example, they should have a dedicated, separate slot for lids.

**19. Do you agree that a NZ CRS should use a 'mixed-return model' with a high degree of mandated retail participation to ensure consumers have easy access to container return/refund points, as well as the opportunity for voluntary participation in the network by interested parties?**

Yes.

The Forum supports a mixed return model including mandatory retail participation but with greater focus on the community recycling/resource recovery hubs operating as depots. Voluntary participation in the network is also fully supported to make return/refund points widely accessible.

**20. Where would you find it easiest to return eligible beverage containers? Please select all that are relevant and rank these from most preferred - commercial recycling facility (eg, depot, more likely to be located in industrial zone); waste transfer station; other community centres/hubs (eg, town hall, sports club, etc); local retail outlet that sells beverages (eg, dairy, convenience store, bottle shop, petrol station); supermarket; community recycling/resource recovery centre; shopping centre/mall; other (please specify)**

The Forum supports convenient and widely accessible return options. All communities should be within a reasonable distance of a return point. The government should consult with TAs and other stakeholders to determine the minimum number of container return points and how these should be distributed across the country.

The Forum recommends a priority focus on community hubs, marae, schools and resource recovery centres to encourage and build community resilience. Convenience is not the only consideration when returning containers; community connectedness, incidental education and bringing waste to the forefront of Kiwi's minds are all priorities, these benefits are much less accessible at supermarket deposits. For example, by including community recycling/resource recovery centres as return facilities, it provides an opportunity to highlight other waste diversion options, promote zero waste living, and create green jobs for local communities.

**21. Retailers that sell beverages are proposed to be regulated as part of the network (mandatory return-to-retail requirements). Should a minimum store size threshold apply? And, if yes, what size of retailer (shop floor) should be subject to mandatory return-to-retail requirements? over 100m<sup>2</sup> (many smaller dairies likely exempt); over 200m<sup>2</sup> (many dairies and some petrol stations likely exempt); over 300m<sup>2</sup> (many retailers, dairies, petrol stations and smaller supermarkets likely exempt) over 200m<sup>2</sup> (many dairies and some petrol stations likely exempt)**

The Forum recommends that in general, all retailers that sell beverages be regulated as part of the scheme. However, this may not be feasible from the onset. Exemption could be considered by the managing agency based on a combination of average beverage sales per annum and access (for the consumer) to the return network.

**22. Do you think the shop-floor-size requirements for retailers required to take back beverage containers (mandatory return-to-retail) should differ between rural and urban locations? If yes, what lower size threshold should be applied to rural retailers for them to be required to take back containers? Over 60m<sup>2</sup> (as in Lithuania); Over 100m<sup>2</sup> (many smaller dairies likely exempt); Over 200m<sup>2</sup> (many dairies and some petrol stations likely exempt); Over 300m<sup>2</sup> (many retailers, dairies, petrol stations and smaller supermarkets likely exempt)**

The Forum recommends rather than setting floor size thresholds, the Government consider an exemption in rural areas where a return depot is within a certain distance of the retailer.

**23. Do you agree that there should be other exemptions for retailer participation? (For example, if there is another return site nearby or for health and safety or food safety reasons)?**

Yes.

However any exemption should be applied for, and not automatically given. Exemptions would need review on a regular basis.

**24. Do you agree with the proposed 'deposit financial model' for a NZ CRS?**

Yes.

The Forum strongly supports the proposed 'deposit financial model' and encourages behaviours towards the top of the waste hierarchy. This will promote redesign and rethinking of systems of production and use. To support this model, clear guidance and legislation on un-redeemed deposits must be developed in consultation with all stakeholders.

**25. Do you agree that a NZ CRS would be a not-for-profit, industry-led scheme?**

No

The Forum encourages greater representation across all stakeholders. It is important that the scheme is led by an independent agency to ensure the best outcomes for all stakeholders including, but not limited to, Councils, community groups and Mana Whenua. The Forum supports greater collaboration with the Social Enterprise Sector to amplify the

circular economy movement. The managing agency should have broader goals than simply achieving high return rates for example: developing a fully accessible depot network, supporting the refillables market and circular economy, other positive public good outcomes. The Forum supports a model where profits are circulated back into the local economy to support actions up the hierarchy. This could for example include financial support for development of the refillables network or washing infrastructure.

**26. Do you agree with the recovery targets for a NZ CRS of 85 per cent by year 3, and 90 per cent by year 5?**

Yes.

The Forum supports the targets and the phased approach, noting that review of the scheme will be required to ensure targets are achievable but high reaching.

**27. If the scheme does not meet its recovery targets, do you agree that the scheme design (including the deposit level) should be reviewed and possibly increased?**

Yes.

Regular review will be required to ensure targets are realistic and that the scheme is achieving the outcomes intended. If not, aspects of the scheme may need to be adjusted, or penalties applied.

**28. Do you support the implementation of a container return scheme for New Zealand?**

Yes

The Forum fully supports the establishment of the NZ CRS to showcase leadership and action towards a circular economy. The Local Government Manifesto 2020 outlines this as a top priority.

The Forum supports the principal of product stewardship as this will enable producers to take more responsibility of their products, ensure that products are designed for a circular economy and encourage a better understanding by consumers of their impact on the environment.

A well-designed CRS will not only increase recycling rates, recover materials and reduce emissions but also increase zero waste living skills, reduce litter in the environment and create jobs.

**29. If you do not support or are undecided about a CRS, would you support implementation of a scheme if any of the key scheme design criteria were different? (eg, the deposit amount, scope of containers, network design, governance model, scheme financial model, etc). Please explain.**

NA

**30. If you have any other comments, please write them here?**

There is a lot of uncertainty on the effect the CRS will have on Council kerbside services. Planning support for TAs to prepare for these changes will be required to minimise costs to ratepayers, provide efficient services and minimise disruption and uncertainty.

Detailed demand and capacity studies are needed across the sector to ensure products can be managed within a circular economy.

The Forum supports nationally mandated, standardised product labelling for recyclability and compostability on all packaging such as the Australasian Recycling Label (ARL) scheme. Producers should also be regulated for providing greater transparency of other environmental impacts of their products.

## **Part 2: Improvements to household kerbside recycling**

### **31. Do you agree with the proposal that a standard set of materials should be collected for household recycling at kerbside?**

Yes.

The Forum supports greater consistency of services and infrastructure across New Zealand, however consideration needs to be given to areas that do not have ready access to re-processors and non-optical sort MRF's. The standard set of materials must be designed to consider all councils and their access to reliable markets.

### **32. Do you agree that councils collecting different material types (in addition to a standard set) might continue to cause public confusion and contamination of recycling?**

Yes.

Standardisation is important to reduce confusion regarding what can and cannot be recycled. It will reduce contamination as consistent messaging will provide clarity and enable people to recycle right.

### **33. Do you think that national consistency can be achieved through voluntary measures, or is regulation required?**

No.

Regulation is required to achieve national consistency and to change our wasteful behaviours, this must be coupled with supporting infrastructure and funding to ensure collection and transportation to reliable markets is accessible for all Councils. Regulation will also provide consistent service provision across both Council and privately contracted services.

### **34. Please tick below all the items from the proposed list which you agree should be included in the standard set of materials that can be recycled in household kerbside collections. glass bottles and jars; paper and cardboard; pizza boxes; steel and aluminium tins and cans; plastic bottles 1 (PET) and 2 (HDPE); plastic containers and trays 1 (PET) and 2 (HDPE); plastic containers 5 (PP).**

The Forum largely supports the proposed list.

The Forum strongly supports actions to move up the hierarchy towards circular systems and consequently items that do not meet the following criteria should be phased out of use;

- have the ability to be efficiently separated and processed at MRF or have (widely accessible) Infrastructure investments to enable this
- have viable end markets in place

If the above standards aren't met and low value products are included in standardised recycling, for example coloured PET or single material labels and bottle sleeves, we recommend an eco-modulated fee approach to push for a more circular approach through design.

**35. If you think any of the materials above should be excluded, please explain which ones and why?**

The Forum supports standardised recycling across the country. The system must be designed for all Councils or infrastructure must be developed to build these capabilities. Pizza boxes and coloured PET are highlighted as a concern for some TAs.

**36. If you think any additional materials should be included, please explain which ones and why?**

NA

**37. Do you agree that the standard set of materials should be regularly reviewed and, provided certain conditions are met, new materials added?**

Yes.

In addition to this, there should be capability for materials to be removed if markets no longer exist. If having to change messaging and behaviours, Councils would need to be supported by additional funding and nationwide campaigns communicating the change.

**38. What should be considered when determining whether a class of materials should be accepted at kerbside in the future? (Tick all that apply) - sustainable end markets; end markets solutions are circular and minimise environmental harm; viable processing technologies; processing by both automated and manual material recovery facilities; no adverse effects on local authorities, including financial; supply chains contribute appropriately to recovery and end-of-life solutions for their products; other (please specify).**

All of the above.

Additionally, the demand and size of the market and capacity of the re-processors. For example;

- Only half the paper and OCC generated in NZ can be reprocessed onshore
- Visy has a limit on the amount of glass it can accept
- The soft plastics market was flooded in 2018 leading to a halt on soft plastics being recycled

**39. Who should decide how new materials are added to the list? the responsible Minister; Ministry for the Environment staff in consultation with a reference stakeholder group; existing Waste Advisory Board; an independent board; other (please specify).**

The Forum supports the Ministry staff in consultation with a reference stakeholder group or independent board determining the inclusion and exclusion of materials from the standardised list. TAs must have representation on the decision making group. This will need representation from both metro and rural councils and North/South Islands. Local government, as the stakeholder with the legislative mandate to manage kerbside, needs to have a strong presence and ability to influence the system.

**40. Do you agree that, in addition to these kerbside policies, New Zealand should have a network of convenient and easy places where people can recycle items that cannot easily be recycled kerbside? For example, some items are too large or too small to be collected in kerbside recycling?**

Yes.

The Forum strongly supports product stewardship schemes where recycling costs are built into the cost of a product so that the responsibility is shifted from councils and ratepayers to producers and consumers. The Forum supports greater collaboration with NGOs and the Community Sector to provide a network of convenient recycling/zero waste hub locations to enable the shift to a circular economy and empower rapid behaviour change.

All new products accepted in CRS but not accepted kerbside should be part of a product stewardship scheme with the money used to subsidise the operation of community hubs.

**41. Do you agree that food and garden waste should be diverted from landfills?**

Yes.

Diverting food and garden waste from landfill will produce environmental, economic, and social benefits locally and nationally.

Access to suitable facilities for processing this material is a limiting factor in many parts of New Zealand. In addition to being diverted from landfill, the organics strategy, planning and management will require secure end markets. This will require significant cross sector collaboration.

**42. Do you agree that all councils should offer a weekly kerbside food scraps collection to divert as many food scraps as possible from landfills?**

Yes.

This is only achievable with significant investment in supporting infrastructure. Many Councils have or are considering introducing kerbside organics collections and it is clear that the cost of doing so is not one that all councils have the capacity to take on. If we are going to achieve the ambitious targets, adequate funding will be required to support new capital and operational costs.

A regional approach to plan for and invest in services and infrastructure needs to be adopted as in many regions, facilities may not be economically viable due to low volumes of organic

materials. Transportation costs to other regions where facilities are located is often prohibitive and not well aligned with emissions reduction objectives.

Many Councils will be unable to support rates increases, and while ratepayers support expansions to local authority services e.g. kerbside organics, they will not support a rates increase. As well as the investment in infrastructure, TAs need time and educational resources to showcase the benefits of this service and bring the community on the journey.

**43. Do you agree that these collections should be mandatory in urban areas (defined as towns with a population of 1000 plus) and in any smaller settlements where there are existing kerbside collections?**

Yes.

This is only achievable with significant investment in supporting infrastructure. Many Councils have or are considering introducing kerbside organics collections and the cost of doing so is not one that all councils have the capacity to take on. If we are going to achieve the ambitious targets, adequate funding will be required to support new capital and operational costs. Alternatives to the standard kerbside collection may be required in rural areas. TAs should have the flexibility to provide alternative services where distance becomes prohibitive to providing kerbside collection in a traditional sense. Especially where outcomes such as community composting, food growing and food/soil resilience are supported.

A regional approach to plan for and invest in services and infrastructure needs to be adopted as in many regions, facilities may not be economically viable due to low volumes of organic materials. Transportation costs to facilities are often prohibitive and not well aligned with emissions reduction objectives.

Many Councils will be unable to support rates increases, and while ratepayers support expansions to services e.g. kerbside organics, they will not support a rates increase. As well as the investment in infrastructure, TAs need educational resources to showcase the benefits and bring the community on the journey.

**44. Do you think councils should play a role in increasing the diversion of household garden waste from landfills? If so, what are the most effective ways for councils to divert garden waste? Offering a subsidised user-pays green waste bin?; Making it more affordable for people to drop-off green waste at transfer stations; Promoting low-waste gardens (eg, promoting evergreen trees over deciduous)?; Other (please specify)?**

Yes.

The Forum recommends that Councils play a role but not necessarily provide a garden waste service. In many cases the private sector provides this option to residents.

For effective capture of all organic materials, TAs will require Central Government support to provide communication of key issues such as methane emissions, avoidance of contamination from physical and chemical sources, best methods of collection and optimum processing approaches. The most effective way for Local Government to achieve diversion is

for MfE to provide analysis and guidance on best practice, otherwise each Council will need to fund and resource the decision making.

The most effective mechanism for reducing garden waste in residual waste bins will be to reduce size and/or frequency of residual waste bins alongside providing alternative garden waste services such as drop off facilities. The Forum recommends research be undertaken to determine optimum kerbside collection frequency and size of bins to support Councils in making these decisions.

**45. We propose a phased approach to the roll-out of kerbside food scraps collections. The timeframes will depend on whether new processing facilities are needed. Do you agree with a phased approach?**

Yes.

Access to suitable facilities is a limiting factor in many parts of New Zealand. If new infrastructure is needed, consideration of funding, consenting, and build times will need to be given. A regional approach to plan for and invest in services and infrastructure needs to be adopted.

Investment in services and infrastructure must be considered wider than household and business generated food scraps and garden waste, and include solutions for organic materials streams such as animal manure, forestry biomass, biosolids and timber. It is also crucial that sustainable end markets such as regenerative agriculture, are developed.

**46. Do you agree that councils with access to suitable existing infrastructure should have until 2025 to deliver food scraps collections? yes, that's enough time; no, that's not enough time; no, it should be sooner.**

Yes.

If funding support and guidance is provided by Government, then 2025 may provide sufficient time for some Councils with access to existing facilities to establish a food scraps collection. Councils would need to undertake the detailed financial planning and procurement in 2023 to be able to consult with their community in their Ten Year Plan process. Consideration must be paid to the competitive tender process as securing a cost effective option for this new service is necessary. If this timing isn't built in, and councils need to source to their existing contractors, additional funding may be required. There is also the consideration of capital investment in vehicles by contractors, and having sufficient contract terms to spread this capital investment across a number of years and this may not align with existing contract terms.

**47. Do you agree that councils without existing infrastructure should have until 2030 to deliver food scraps collections? yes, that's enough time; no, that's not enough time; no, it should be sooner.**

Yes.

The Forum fully supports diversion of organic material from landfill, however a lack of infrastructure and funding are current limiting factors for mandated change. Consideration



needs to be given to the costs of collection and infrastructure procurement. Council's WMMPs will also need review with time allocated for the options analysis, community consultation and procurement of new services.

**48. Are there any facilities, in addition to those listed below, that have current capacity and resource consent to take household food scraps? Envirofert – Tuakau; Hampton Downs – Waikato; Mynoke Vermicomposting site – Taupō; Enviro NZ – new facility planned for the Bay of Plenty in 2023; Living Earth – Christchurch; Timaru Eco Compost Facility – Timaru.**

It is clear from the list that significant investment in infrastructure is required and that the development of an organic waste management strategy and a comprehensive framework for reduction of and beneficial reuse of organic wastes is needed.

**49. We propose to exclude the following non-food products and any packaging from any kerbside collection bins used to divert food scraps and/or green waste from landfills: kitchen paper towels / hand towels / serviettes; newspaper and shredded paper; food-soiled cardboard containers (eg, pizza boxes); cardboard and egg cartons; compostable plastic products and packaging; compostable fibre products and packaging; compostable bin liners; tea bags. Are there any additional materials that should be excluded from kerbside food and garden bins? Please explain which ones and why.**

Yes.

Standardisation of acceptable materials must be set across the country to avoid contamination and confusion same as the approach of recyclable material.

- Depending on the methodology used for processing, unless the facility can accept items such as noxious weeds (e.g. broom, gorse) and items that are difficult to process (e.g. flax and cabbage tree leaves) then these items will need to be excluded
- Careful consideration should also be given to the acceptance of organic materials that may cause herbicide or pesticide chemical contamination of compost or soil outputs. Clopyralid and aminopyralid are examples of herbicides that persist through the composting process and cause significant damage to particular crops

**50. For non-food products or packaging to be accepted in a food scraps bin or a food and garden waste bin, what should be taken into consideration? Tick all that apply - products help divert food waste from landfills; products meet New Zealand standards for compostability; products are certified in their final form to ensure they do not pose a risk to soil or human health; products are clearly labelled so that they can be distinguished from non-compostable products; a technology or process is available to easily identify and sort compostable from non-compostable products; producers and users of the products and packaging contribute to the cost of collecting and processing.**

All of the above.

**51. If you think any of the materials listed above should be included in kerbside food and garden bins, please explain which ones and why.**

NA

**52. Do you agree that it is important to understand how well kerbside collections are working?**

Yes.

The Forum recommends measurement of behaviours up the hierarchy, not just at the recycling and disposal level. Focusing on disposal, diversion and recycling doesn't encourage innovation and wider emissions reducing behaviours. Measurements of all activity and impact should be adopted and shared widely so that progress at the top of the hierarchy can be monitored.

**53. Do you agree with the proposal that the private sector should also report on their household kerbside collections so that the overall performance of kerbside services in the region can be understood?**

Yes.

Reporting measures that demonstrate progress across both the public and private sector need to be developed. Reporting should not be left to government agencies alone but should include requirements for all waste collectors.

**54. Do you agree that the information should be published online for transparency?**

Yes.

Information on progress should be publicly available, and if aggregated to protect commercially sensitive information, be split between public and private sector.

**55. Apart from diversion and contamination rates, should any other information be published online?**

Yes.

Information should include final destination of products and indication of onshore or offshore processing locations. This will help identify any potentially compromised and/or stranded assets and help ensure we meet national targets.

The Forum recommends measurement of each material stream over time to measure the reduction in consumption of goods.

The Forum supports all the private sector data (as listed on page 85 of the consultation) be published. The Forum recommends transparency of the calculations behind the total waste stream data and material recovered.

The Forum notes that the diversion and contamination rates for each region may need independent verification as data between regions, or collectors may not be comparable. Currently, contamination rates can be determined via ad hoc kerbside audits, less regular SWAPS, or at the processing facility as a percentage of the material that is processed. A consistent, standardised approach is needed.

**56. Should kerbside recycling services have to achieve a minimum performance standard (eg, collect at least a specified percentage of recyclable materials in the household waste stream)?**

Yes.

Minimum performance standards should apply to Councils and private collectors.

The Forum also recommends measurement of behaviours at the top of the hierarchy, taking into account materials diverted before the household collection process, such as composting at home. The focus for measuring performance needs to be on reducing waste generated, not just comparing percentages of waste collected versus recycling presented at kerbside.

**57. Should the minimum performance standard be set at 50 per cent for the diversion of dry recyclables and food scraps?**

Yes.

The Forum endorses ambitious targets and measures that also incorporate activities up the hierarchy.

The Forum relies on the Ministry's analysis to set ambitious targets that our sector is capable of achieving. The Forum supports consequences for not meeting targets once adequate support has been given to Councils that require help.

**58. We propose that territorial authorities have until 2030 to achieve the minimum performance target, at which time the target will be reviewed. Do you agree?**

Yes.

The Forum proposes the framework include measurement and targets that also reflect the top of the waste hierarchy.

**59. In addition to minimum standards, should a high-performance target be set for overall collection performance to encourage territorial authorities to achieve international best practice?**

Yes.

High performance targets should be staged over time and include emphasis at the top of the hierarchy.

**60. Some overseas jurisdictions aim for diversion rates of 70 per cent. Should New Zealand aspire to achieve a 70 per cent target?**

Yes.

The Forum supports ambitious targets with clear timeframes and pathways for all sectors to participate in achieving them.

**61. What should the consequences be for territorial authorities that do not meet minimum performance standards?**

The Forum supports consequences only after adequate support via investment, advice and other assistance is provided to councils not achieving minimum performance standards. Adding a financial consequence will make it harder rather than enable success.

**62. Should either glass or paper/cardboard be collected separately at kerbside in order to improve the quality of these materials and increase the amount recycled? - glass separate; paper/cardboard separate; separated, but councils choose which one to separate; status quo – they remain comingled for some councils.**

Yes.

Separation will help ensure that products are of high quality and saleable resources. Investment in infrastructure to enable single stream collection is required to achieve this. It is important that our collection systems do not result in contamination and decrease the value of recycling commodities.

**63. If glass or paper/cardboard is to be collected separately, should implementation: begin immediately; wait for any CRS scheme design to be finalised; wait until the impact of a CRS scheme has been observed.**

The Forum recommends that implementation wait until the impact of a CRS scheme has been observed. There is a lot of uncertainty in the future for Councils. The frequency, size of bins, rates costs, contract rates etc will all be significantly affected by the introduction of a CRS. In the near-term, Councils will require support to transition their communities & contractors.

**64. Should all councils offer household kerbside recycling services?**

Yes.

The Forum supports this for urban properties.

**65. Should these services be offered at a minimum to all population centres of more than 1,000 people?**

Yes.

The Forum fully supports an approach that will lead to greater consistency of services and infrastructure across the country. There will be the reality of some small, rural, and or remote communities where it is not realistic to provide the same level of service as a more densely populated area. Alternative approaches should be supported for local solutions in these communities.

**66. Do you agree that councils without any council-funded kerbside recycling collections should implement these collections within two years of their next Waste Management and Minimisation Plan?**

Yes.

Councils will require time to review their WMMP, consult with their community and budget within the Ten Year Plan process. Two years after the adoption of a new WMMP would be the minimum amount of time required to plan, procure and establish new services.

**67. What research, technical support or behaviour change initiatives are needed to support the implementation of this programme of work?**

A nationally consistent and collaborative approach is necessary to avoid duplication and inefficiencies.

**Research** – The Forum acknowledges the beneficial research which has already been completed and agrees that the proposed additional pieces of research presented in the consultation document on page 96 would be beneficial.

In addition, research linked to successful behaviour change initiatives would be welcomed alongside continued research into national reuse behaviour including barriers to uptake. Impact measurement guidance and tools would be useful to aid councils in measuring the success of initiatives.

Case studies on best practice and innovative waste facilities would be useful for those planning zero waste/resource recovery hubs.

We note the use of scenario planning to help identify the most impactful opportunities. This has been a successful tool for allocating expenditure for food waste reduction initiatives by Fight Food Waste Australia.

**Funding** - For behaviour change to be effective, messaging needs to be clear, consistent, simple, constant and provided via multiple mediums and platforms. It needs to be funded and driven at a national level and supported at a local level.

Waste levy funds need to be available across a wide range of disciplines not limited to Councils, however, 50% of the levy revenue should continue to be available to Councils to support the implementation of their WMMPs.

Funds should be made available to rapidly support infrastructure that not only reduces waste but significantly reduces emissions. Focus on initiatives that help reach NZ's emissions reduction goals should be prioritised.

The levy returns should not be based on a Council population basis alone but reflect areas of significant under-investment and areas with higher-than-average demand on services for example due to high visitor numbers.

**Regulation** - It is imperative that responsibility and regulatory interventions are spread more evenly across production supply chains, with more emphasis on requiring designers, businesses, and producers to take responsibility upstream to reduce the waste their products create e.g., through redesign and system change. The design out of waste through regulated policy and mandatory accreditation schemes will help support rapid behaviour change from designers and producers right through to consumers.

**Part 3: Separation of business food waste**

**68. Should commercial businesses be expected to divert food waste from landfills as part of reducing their emissions?**

Yes.

Food loss and waste currently contributes to 8% of global greenhouse gas emissions, avoidable food waste could not only be not contributing to climate change but feeding people in need. Reducing food waste is ranked as the third best global solution in addressing climate change<sup>1</sup>.

**69. Should all commercial businesses be diverting food waste from landfills by 2030?**

Yes.

The Ministry should encourage reduction strategies focused up the food recovery hierarchy which provides useful guidelines for governments, food manufacturers, grocery retailers, growers and consumers in deciding how to prevent and manage food waste. It is imperative that businesses are provided with the tools and the reasons to not only divert their food waste but reduce it. Businesses, residents and the country loses resources on investing in growing, preparing and transporting food that gets wasted, avoidance and reduction must be a priority.

Access to suitable facilities is a limiting factor in many parts of New Zealand. Where investment in infrastructure is needed, support to minimise delays and roadblocks caused by consenting processes is required.

**70. Should separation be phased in, depending on access to suitable processing facilities (e.g., composting or anaerobic digestion)?**

Yes.

Businesses in areas where suitable infrastructure already exists should be able to divert food waste ahead of those areas where new infrastructure is required to be built. Organics management guidelines and composting standards need to be established to ensure we have consistency across the country.

Pushing up the waste hierarchy is key, there must be a strong focus on enabling reduction and avoidance of food waste first and foremost, secondly keeping resources as close to source as possible must be a focus. Providing resources and building capability for businesses to compost on site or take to a local community garden may help reduce overall emissions.

**71. Should businesses that produce food have a shorter lead-in time than businesses that do not?**

No.

All businesses should be required to comply, differing lead times would complicate education and enforcement.

**72. Should any businesses be exempt? If so, which ones?**

No.

All businesses should be required to comply. The Forum recommends prioritising reduction education and capability building first and foremost. Capability must be provided to small

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<sup>1</sup> [Home | NZ Champions 12.3 \(nzchampions123.org\)](https://www.nzchampions123.org/)

businesses who may find organics diversion cost prohibitive. Options such as shared schemes (businesses working together and sharing bins), community compost collectives should be encouraged.

### **73. What support should be provided to help businesses reduce their food waste?**

The Forum recommends the Ministry promote the food recovery hierarchy and fund the expansion of existing food waste reduction programmes. The hierarchy should encourage (in order of preference) source reduction, feeding hungry people, feeding animals, and composting, with disposal as a last resort. Supporting businesses to firstly understand their food waste and then avoid and reduce producing food waste, will in turn save them money, reduce strain on the diversion system and reduce emissions.

Linking the organic materials sector more clearly with the agricultural sector and incentivising a shift to regenerative farming practices needs to be included.

The Forum recommends the Ministry set a baseline for food waste, understanding which industries produce the majority of food waste to identify opportunities and set targets by industry. This will act as a motivator for businesses to reduce food waste as well as ensure unavoidable food waste ends in the right bin/location.

There must be a strong education campaign coupled with tools on how to reduce food waste, case studies and funding to implement or trial innovative solutions. Other suggestions include;

- Campaigns such as Love Food Hate Waste for business, a program delivered in Victoria and NSW, Australia, developed action plans and support for hospitality businesses and saw initial reduction rates of 16%-20%
- Capability building to divert organics on site such as subsidised worm farms and composting systems.
- Voluntary agreements for large organisations to set internal food waste reduction plans and targets have been a major influencer internationally
- Creation of a recognition programme for businesses that recover food. In conjunction with the new, streamlined online reporting system for recycling, the Ministry should provide the opportunity for businesses to report food recovery activities.