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Ministry for the Environment
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Wellington
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Submission on Options to Reduce Emissions from Organic Waste

Tēnā koutou,

1. The Kāpiti Coast District Council (the Council) welcomes the opportunity to comment on the options to reduce emissions from organic waste. Our comments also relate to the Government's related consultation on Proposed Changes to the New Zealand Emissions Trading Scheme Regulations 2026.
2. In summary, the Council:
 - a. Supports the Government's commitment to reducing organic waste and the biogenic methane it generates, including the emphasis on prioritising efforts higher up the waste hierarchy.
 - b. Endorses the overall direction of travel set out in the consultation document and looks forward to working with central government on some of the initiatives.
 - c. Encourages greater emphasis and support from central government, both in funding and investment commitments, providing greater certainty and consistency in policy direction to promote investment by industry and councils, and in building awareness and educating the public about what actions they can take themselves to reduce or deal with organic waste.
3. Our Council, as did other Councils, commenced steps to introduce mandatory kerbside collection of food scraps. The cost of changes in policy direction, and the uncertainty it causes, slows progress on this important issue. Raising awareness and understanding of the environmental impacts of waste generation, and of the increasing costs associated with managing waste that are ultimately borne by ratepayers, will help reduce emissions regardless of changes in government policy direction.
4. Forming partnerships and strategic alliances with a range of parties is a key mechanism to drive behaviour change and to support waste minimisation efforts. As such, actively

involving communities in the design and delivery of resource management activities will contribute to a culture shift towards the reduction of waste.

5. As a smaller district within the Wellington region, our perspective is shaped by the practical realities of delivering waste services at modest scale. Our feedback therefore returns throughout to the following themes:
 - a. We strongly support national consistency and regional collaboration to reduce duplication, increase cost effectiveness and enable economies of scale.
 - b. Funding and co-investment will be critical to success, for processing infrastructure, and for behaviour change.
 - c. Policy certainty and consistency is key to promoting investment by industry and councils.
 - d. Consistent national datasets on waste flows, emissions and infrastructure performance are needed to support good decisions.
 - e. All measures should reinforce the waste hierarchy, prioritising reduction, reuse and recycling or composting ahead of energy recovery and disposal. Energy recovery and disposal initiatives should not undermine or replace greater effort to reduce waste in the first instance.
6. We would welcome the chance to work with the Ministry as these measures are developed further. Below we respond to each of the five options proposed in the consultation document.

Part A: Improvements to organic waste management

Option 1: Supporting businesses to reduce and recover food waste

7. **The Council supports all proposals within this option:** a national action plan, a government-industry working group, further research into the barriers of food waste reduction, developing templates and guidance for businesses on reducing food waste and a nationally consistent reporting framework and updated guidance on managing unavoidable waste.
8. The Council's direct role in business food waste is limited, but we actively support waste minimisation through education and behaviour-change initiatives - including Love Food Hate Waste, and through local composting and community partnerships.
9. We exercise further influence through the Solid Waste Management and Minimisation Bylaw 2021,¹ service contracts and through supporting the implementation of the comprehensive Wellington Region Waste Management and Minimisation Plan 2023 - 2029 (Regional WMMP).
10. The most significant barriers we observe are the absence of standardised data and reporting, limited council resourcing for business engagement, a lack of awareness of both the environmental and financial impacts of waste, and connected to this, the lack of

¹ This Bylaw is made pursuant to section 56 of the Waste Minimisation Act 2008, sections 145 and 146 of the Local Government Act 2002, section 64 of the Health Act 1956, and section 12 of the Litter Act 1979.

clear financial or regulatory incentives for diversion. The initiatives proposed here could help address these barriers and support action at the local level.

11. Our central request is that these tools deliver genuine national consistency and translate into practical, accessible and implementable guidance and reporting frameworks for the small and medium-sized enterprises that make up much of our local business base. We note that much of the guidance produced to date is lengthy and not always accessible for businesses focused on maintaining viable and profitable operations. Any guidance should support businesses to balance commercial realities with reducing food waste and associated emissions.
12. We support the development of an action plan and would recommend that this work is expedited to ensure genuine action is taken to reduce the barriers to food waste reduction. A nationally led action plan would support and complement the work councils do within their business communities and reduce pressure on councils to address a national issue without corresponding funding or support from central government.
13. While there is a need to focus on food waste generated by businesses given its contribution to waste volumes and emissions, Council recommends the action plan adopts a whole-of-society approach. Councils, central government, mana whenua, businesses and communities all have a role to play in protecting environmental resources and reducing emissions. Businesses are only one part of the wider system and cannot drive change in isolation.
14. We note that the proposed government-industry working group does not explicitly include local government. We recommend any working group must include local government as a non-negotiable. It's important that all stakeholders participate in this working group so that the distribution of costs, investment, implementation requirements and incentives across the public and private sectors is appropriately balanced. Councils are increasingly being asked to do more with constrained resources, and any transfer of responsibility without corresponding funding will only exacerbate existing challenges.
15. Of the options, we would prioritise the national action plan and the local/central government-industry working group most highly, followed by a national reporting framework and guidance on unavoidable waste, and then research on barriers and planning templates. We consider it likely that many barriers to food waste reduction are already reasonably well understood and that further insights will emerge through implementation of the other proposed actions.

Council recommends that:

- The proposed government-industry working group explicitly includes local government representation.
- All changes promote genuine national consistency and result in practical, accessible and implementable guidance and reporting frameworks for businesses.
- The national action plan adopts a whole-of-society approach rather than focusing solely on business food waste.
- Priority is given to developing the national action plan and establishing the local government-industry working group.

Option 2: Supporting councils to implement or enhance kerbside organic services

16. The Council does not provide a kerbside food scraps or food and garden organics (FOGO) collection. Kerbside waste services in our district are delivered through a licensed, fully “out-of-house” model, in which private operators provide collections under Council licence rather than through a single Council-run contract. Green waste services are currently available through the private market, and there is strong regional interest in introducing food scraps and FOGO services. This operating model shapes how any organic collection could be introduced in Kāpiti and means national direction and regional coordination are particularly important to us.
17. The principal barriers we face are cost and affordability for a smaller district, access to local and regional processing infrastructure, contracting complexity under our licensing model, and the behaviour-change and contamination challenges common to all councils.
18. To address these barriers, we need funding support for both capital and operating costs, regional infrastructure planning, and clear and consistent national direction to reduce investment risk. One of the objectives of New Zealand's climate change framework is to provide certainty for investors through emissions budgets and Emissions Reduction Plans. Policy changes, such as removing mandatory food scraps collection requirements, undermine that certainty, create a chilling effect on investment and can slow progress toward emissions reduction objectives.
19. **We support all four options and place the highest priority on funded trials and standardised modelling tools. These initiatives are critical for developing robust business cases and would help de-risk decisions on future service delivery.**
20. We would prioritise funded trials and the shared findings first, followed by standardised modelling tools, and then behaviour-change resources and climate messaging. Priority research areas for us include the drivers of resident participation, approaches to contamination reduction, and service models suited to rural and small-district contexts.
21. We recommend that any public awareness campaign is not solely linked to promoting existing or new kerbside collection services, which ultimately come at a cost to ratepayers. As noted earlier, there is a significant opportunity for central government to educate households about the environmental impacts of food waste and the practical actions they can take to reduce waste and lower emissions. This is particularly important at a time when households are facing ongoing cost pressures and communities are seeking to limit increases in rates and household costs.
22. We also recommend that central government provide long-term policy certainty on organic waste diversion initiatives to support investment decisions by councils, private operators and processing providers.

Council **recommends** that:

- Funded trials and standardised modelling tools are prioritised to support the development of robust business cases for organic waste services.
- Central government provides greater long-term policy certainty to support investment in collection and processing infrastructure.

- Any public awareness campaign is not solely focused on promoting kerbside collection services, but also supports households to reduce food waste and emissions through their own actions.

Option 3: Enabling organic processing solutions, including biogas

23. For a district of our size, where scale and proximity are key determinants of viable organic processing solutions, we will necessarily rely on regional approaches. In addition to the costs of introducing kerbside collection, important considerations include transport costs and associated emissions, access to processing infrastructure, the reliability and long-term viability of technologies, and the strength of market demand for outputs such as compost, digestate and energy.
24. **We support the government leading work to map local infrastructure gaps and opportunities**, which we consider critical to coordinated regional planning and investment.
25. **We also support improved information on biogas and other waste-to-energy solutions, albeit with some caution.** These technologies should complement rather than undermine the waste hierarchy, be appropriate to the scale of the waste streams, and avoid creating incentives to maintain residual waste that would be better reduced, reused or diverted. The most effective environmental and economic outcome remains preventing waste from being generated in the first place.
26. To make sound investment decisions, councils need better information on the costs, emissions impacts and performance of different processing options, supported by a national or regional infrastructure planning strategy that provides certainty and confidence for long-term investment.

Council **recommends** that:

- Biogas and waste-to-energy solutions be carefully designed to avoid locking in waste streams that would be better reduced or diverted.
- National work includes improved information on the costs, emissions impacts and performance of organic processing technologies, supported by national or regional infrastructure planning.

Part B - Improvements to landfill gas management

Option 4: Broadening waste sector participation in the Emissions Trading Scheme

27. **The Council supports strengthening the coverage of the Emissions Trading Scheme (ETS) where this will genuinely drive emissions reduction.** However, any expansion must avoid placing unreasonable costs on councils and ratepayers, particularly in smaller districts with limited rating bases.
28. The Council considers that landfills should remain the primary point of ETS coverage within the waste sector. We are cautious about extending ETS obligations to resource recovery facilities, as this risks creating a disincentive for waste diversion and undermining the very outcomes this broader work programme seeks to achieve.
29. Where ETS coverage is expanded, changes should be phased, equitable and accompanied by clear price signals and viable alternatives. Operators should have meaningful opportunities to reduce emissions rather than simply absorbing additional compliance costs.
30. We recommend that any ETS changes are paired with investment in diversion infrastructure and meaningful transition support for councils, ensuring stronger price signals are introduced alongside practical alternatives for reducing emissions.

Additional Comments on Proposed Changes to the New Zealand Emissions Trading Scheme Regulations 2026

The Council in principle supports the Government's proposals to improve the accuracy of ETS reporting and update the default and unique emissions factors (DEFs and UEFs) using the latest evidence. Accurate emissions information is key to identifying, measuring and incentivising emission reduction activity.

However, consistent with our comments above, we remain cautious about the broader impacts on system incentives. The compliance costs associated with ETS obligations highlight the risks of extending coverage to resource recovery facilities without corresponding investment in diversion infrastructure, practical alternatives and transition support. These measures should be introduced together to avoid unintended consequences for waste minimisation efforts.

Council recommends that:

- Any extension of ETS coverage to resource recovery facilities is carefully designed to avoid discouraging waste diversion and resource recovery activities.
- Any expansion of ETS obligations is accompanied by investment in diversion infrastructure, practical alternatives and meaningful transition funding for councils.
- Changes are phased and implemented in a way that provides certainty for operators while supporting genuine emissions reductions.

Option 5: Considering landfill gas management in the new planning system

31. **The Council supports strengthening landfill gas management requirements, provided implementation is practical, proportionate and recognises the different circumstances of Class 1 and Class 2 landfills.** Any new requirements should also take account of the feasibility of compliance at smaller and rural sites.
32. **We support the proposed 60 percent minimum capture efficiency standard in principle,** while recognising that a higher long-term target may be appropriate as technology and operational practices continue to improve. Introducing the standard will require a realistic implementation timeframe and appropriate funding support.
33. The main challenges we anticipate are the technical limitations of smaller landfills, the resourcing required for monitoring, reporting and compliance activities, and the resulting cost impacts for ratepayers. To support implementation, we would value clear national guidance, funding assistance, improved compliance tools and better access to relevant data for councils and consenting authorities.

Council **recommends** that:

- Any changes to landfill gas management requirements are practical and proportionate, recognising the different circumstances of Class 1 and Class 2 landfills and the challenges faced by smaller and rural sites.
- Changes are accompanied by clear national guidance, funding assistance, improved compliance tools and better access to relevant data.
- A realistic implementation timeframe is provided to enable councils and operators to meet new requirements effectively.

In summary:

The Council supports the Government's objective of reducing emissions from organic waste and improving landfill gas management. We support a coordinated national approach that strengthens waste minimisation, improves emissions outcomes and provides certainty for investment and long-term planning.

The Council thanks the Ministry for the opportunity to provide feedback on these proposals and would welcome the opportunity to discuss any aspect of this submission further.

Ngā mihi,



Darren Edwards
Chief Executive

Kāpiti Coast District Council