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Friday, 17 June 2022

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*Te Hui o Te Kaunihera ā-Rohe o Heretaunga*

**Hastings District Council**

**Joint Waste Futures Project Steering Committee Meeting**

*Kaupapataka*

# Open Attachments Under Separate Cover

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*Te Rā Hui:*

Meeting date:

**Friday, 17 June 2022**

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*Te Wā:*

Time:

**10.30am**

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*Te Wāhi:*

Venue:

**Council Chamber  
Ground Floor  
Civic Administration Building  
Lyndon Road East  
Hastings**

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**TE KAUNIHERA Ā-ROHE O HERETAUNGA**

ITEM	SUBJECT	PAGE
4.	<b>HASTINGS DISTRICT COUNCIL - WASTE MANAGEMENT AND MINIMISATION PLAN IMPLEMENTATION UPDATE</b>	
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# Waste Education and Engagement Strategy



## 1.0 Where are we now?

The Joint Waste Management and Minimisation Plan 2018-2024

Highlighted key waste issues for Hastings District and Napier City:

- Close to 50% of the material going to Omarunui Landfill can be composted or recycled.
- The other 50% contains more divertible items such as TV's, batteries, plaster board and other electronic waste, etc.
- Undesirable kitchen and garden waste makes up approximately a third of all waste entering Omarunui Landfill.
- Close to 80% of rubbish coming from householders can be diverted elsewhere.
- Bagged rubbish collection services pose greater safety risks to collectors compared to bins.
- Some residents and businesses are unaware of their waste options as educational/informative campaigns have had limited reach.
- Litter, and illegal dumping continue to occur despite fines, enforcement and education.
- A large number of rural residents have little to no access to proper waste disposal.

## 2.0 Where do we want to be?

### 2.1 Vision

A community that values resources and understands the impact of their choices. A community that feels empowered to make changes and actively works to reduce waste following the principles of the waste hierarchy.

### 2.2 Guiding Principles

These principles will help shape the actions delivered by the Strategy.

#### **Communication not information**

We want to move away from traditional information campaigns and move towards a more holistic approach where we have conversations with our community, co-design programmes so our journey to reduce waste becomes a shared goal.

#### **Empowering Hastings**

We can't do this alone and having a community that has the knowledge, tools and desire to reduce waste is essential.

#### **Respecting our heritage and embracing kaitiakitanga**

It is important that we care for Papatūānuku and call upon our community to understand our roles as guardians.

## 3.0 How Will We Get There?

**Goal 1 Create a better understanding of the impacts of waste, local waste management practices and the principles of the Waste Hierarchy.**

OBJECTIVES	
1.1	Help our community to better understand what happens to their waste and raise awareness of local waste volumes.
1.2	Promote the principles of the Waste Hierarchy, emphasising the need to move beyond recycling.
1.3	Develop community awareness of Local Governments' role and responsibility within the national waste and resource recovery context.

**Goal 2 Provide our community with the knowledge and tools they need to reduce waste.**

OBJECTIVES	
2.1	Work with our community to develop programs, workshops and campaigns to encourage the reduction, reuse, repair and recycling of waste.
2.2	Work with schools to promote waste reduction and recycling.
2.3	Encourage youth led initiatives, programs and campaigns to create change.
2.4	Develop a Business Program to provide guidance to businesses on how to implement changes to reduce waste.

**Goal 3 Increase resource recovery of waste through education and collaboration.**

OBJECTIVES	
3.1	Identify problem waste streams and promote preferred disposal options.
3.2	Establish Henderson Road Resource Recovery Centre as a point of resource recovery information for residents.

**Goal 4 Lead by example and promote best practice.**

OBJECTIVES	
4.1	Promote steps Council is taking to follow the principles of the Waste Hierarchy.
4.2	Promote community initiatives working to reduce waste.
4.3	Encourage businesses to share best practice.

**Goal 5 Help foster a community that cares about reducing waste and living more sustainably.**

OBJECTIVES	
5.1	Strengthen relationships with community groups, partners and local organisations so we can support each other on our journey towards Zero Waste.
5.2	Trial innovative ways of engaging with our community.
5.3	Encourage initiatives that use principles of the sharing economy.

## 3.1 Behaviour Change

Achieving the goals of the Joint Waste Management and Minimisation Plan and those of the Waste Education and Engagement Strategy are dependent on changing people's attitudes and behaviours towards waste.

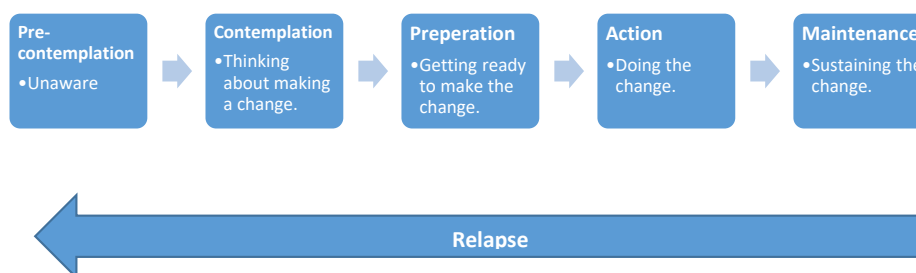
Human behaviour is incredibly complex and countless theories and models have been developed to explain it. These theories and models paint a picture of things that shape our decisions, the way we process information and the factors that can create sustained behaviour change. None of these are perfect but they do give us a really good insight into what can influence our decision making and can help us on our journey to change people's habits.

When implementing projects/programmes of the Waste Education and Engagement Strategy we will consider the context of what we are trying to achieve and use a mix of the theories, models and tools we have available to us.

### 3.1.1 Tools available

#### Stages of Change Model

A foundation for our thinking will be based on the Stages of Change Model - where the subject moves through five stages. The first three stages is where they start thinking about changing their behaviour before taking action and implementing the newly formed behaviour. Just as important is the ongoing maintenance of the behaviour until it becomes a habit. The arrow below shows that relapse can happen at any time. In reality it is likely that the change is not linear as depicted below but will hop up and down between the stages.

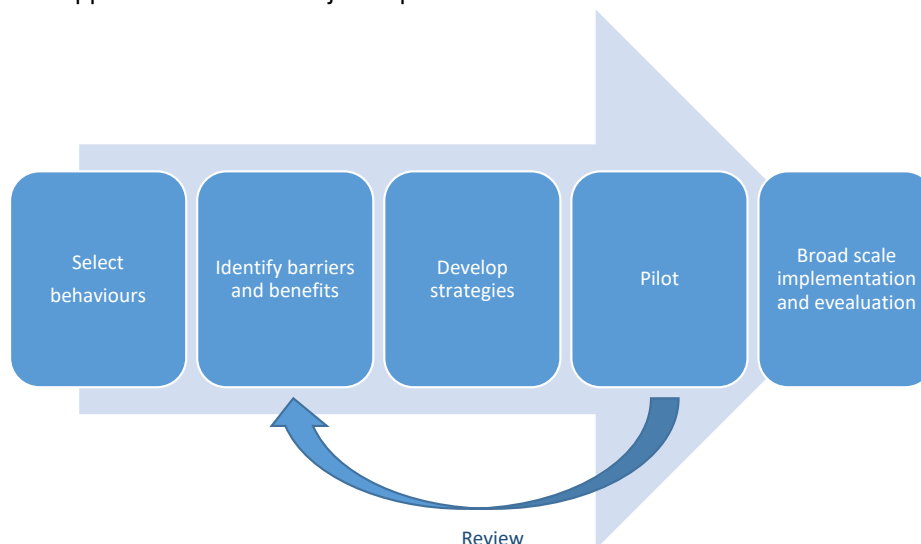


Stage	Our Community	Example Community Engagement Tools
<b>Pre-contemplation</b>	Is our community aware? What do they know? What do they not know?	Surveys Waste Audits Kerbside Contract Data Focus groups
<b>Contemplation</b>	Do they understand? Do they believe in it? How do we better inform them?	Focus groups Surveys Interviews Partner feedback Sharing data Fostering social norms Pop-up stalls Talks Cinema screenings Digital/print media Videos Exciting online resources Case studies Community champions Social Media Facility Tours Trusted Voices Simplify messaging
<b>Preparation</b>	Do they have the tools/ infrastructure/ knowledge to do this? What are the barriers and how can we remove them?	Workshops Access to disposal facilities Promotion of A-Z Partnerships
<b>Action</b>	How can we make it easy to follow through with the action? Can we help make this a habit?	Prompts Celebrating success Community network Set the right 'Default' Reduce choice overload Use commitments
<b>Maintenance</b>	How can we continue to support and encourage our community to continue?	Regular communication Follow up surveys Community feedback Community network Encouraging transition to community advocate

### Community Based Social Marketing

One of the tools that we will use is Community Based Social Marketing, developed by Doug McKenzie-Moh, it has been proven to be effective method of fostering sustainable behaviour change.

This approach involves 5 major steps.



The process focuses on removing barriers whilst simultaneously enhancing motivation through social influences. Community involvement is key throughout the stages from problem definition to evaluation.

### Auckland Councils' Behavioural Insights Toolkit

Designed by the Auckland Research and Evaluation Unit the behavioural insights toolkit is a step-by-step process for building a behavioural intervention. The toolkit consists of a template that helps you identify the behaviour you want to change, brainstorm ideas for promoting the desired behaviour and then move on to test, learn and adapt these to find the most successful intervention.

The kit also includes a set of behavioural insights cards to use during the brainstorming section. Each card describes a behavioural principle, gives examples, suggestions and explains how to apply the principle.

See Appendix 1.0 for the template and an example card.

### A Palette of Possibilities for Environmental Action Projects

Written by the Australian Association for Environmental Education, A Palette of Possibilities provides a framework for developing 'action projects' defined as a project whose aim is to influence the choices and actions of human beings.

It is built around doing human-centred research from which you develop a 'theory of change'. This 'theory of change' is made up of a mixture of systemic and behavioural strategies.



Figure xx Example of Systemic and Behavioural Strategies

#### A 'theory of change' format:

Problem: ..... [measurable] Location: ..... [specific]



#### Examples:

Problem: dog attacks on Little Tern breeding sites. Location: Bongil Beach, Sawtell.

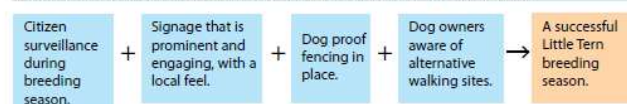


Figure xx Example of 'theory of change' format



## Action Plan

### Key

Waste Community Engagement Advisor – WCEA

Waste Minimisation Office – WMO

Senior Waste Minimisation Officer – SWMO

Waste Planning Manager - WPM

**Goal 1 Create a better understanding of the impacts of waste, local waste management practices and the principles of the Waste Hierarchy.**

	Action	Evaluation Measures	Officer/s Responsible	Timeframe
1.1	Help our community to better understand what happens to their waste and raise awareness of local waste volumes.			
A	Regularly review waste website pages to ensure information is relevant and up to date.	Monitor number of CRMS/internal requests to update or remove information. Page Hits. Hazmobile and Collection Day Changes to be on the website 1 month prior.	WCEA	Every 6 months.
B	Create a video series on the journey of our waste and recycling. From the	Videos created. Feedback from community.	WCEA, SWMO	Completed by December 2022.

	doorstep to the recycling facility and doorstep to landfill.	Engagement levels – views, reach, shares through social media and on website. Target views 1000? Think about views in distribution.		
C	Investigate the creation of a Virtual Reality tour of the landfill.	Report findings. Evaluate cost vs. benefit.	WCEA, SWMO	Report to be completed by December 2022
D	Investigate the option to add a counter onto the website that can track tonnages of waste to landfill.	Report findings. Is it possible? Evaluate cost vs. benefit.	WCEA	Report to be completed by December 2022
E	Create infographics that easily show what happens to our waste.	Gather feedback from the community on how easy our comms are to understand.	WCEA	Ongoing
F	Promote our yearly waste figures and quantify them in terms that are local and can be easily comprehended e.g we create so much waste it would fill the Mitre 10 Sports Park x amounts of times.	Yearly figures should be easy to find on website, and easy to comprehend. Create reference sheet for tonnage comparisons.	WCEA	Yearly
<b>1.2 Promote the principles of the Waste Hierarchy, emphasising the need to move beyond recycling.</b>				
A	Embed the principles of the Waste Hierarchy into talks, workshops and programs we create.	Our website, communications and events should reflect this. A check should be carried out to see if, where possible, this has been applied. Waste Hierarchy video series! Comms Plan – resources. Repair it month.	Whole Team	Ongoing

1.3	Develop community awareness of Local Governments' role and responsibility within the national waste and resource recovery context.			
A	Create a section on the website that explains our own responsibilities and sets out what is happening at a national level.	Section created. Page views.	WPM	December 2022
B	Promote relevant MFE consultations on our website and through the newsletter and in our 'Waste Wednesday' social media posts.	Consultations shared through social media, newsletter, website and where possible My Hastings. Where appropriate feedback collected from the community. Monitor reach of campaign.	WPM	Ongoing
C	Work with our partners in the community to encourage residents to respond to consultations and contact their Councillors and MPs to advocate for waste reduction policies.	?	Whole Team	Ongoing

**Goal 2 Provide our community with the knowledge and tools they need to reduce waste.**

	Action/mode of engagement	Evaluation Measures	Officer/s Responsible	Timeframe
2.1	Work with our community to develop programs, workshops and campaigns to encourage the reduction, reuse, repair and recycling of waste.			
A	Develop and pilot a 'Slim Your Bin' program working closely with approximately 10 households to reduce their waste by 30%. This would include waste audits, workshops/guides and a video series.	Participants to reduce waste by 30%. Online program carried out by 500 households.	SWMO	July 2023
B	Create a quarterly social media plan.	Plan created. Reach of messaging.	WCEA	Every 3 months
C	Investigate other online platforms to engage with our community.	Report on other platforms, identify any to trial.	WCEA	December 2022
D	Create a calendar of events for the team to attend.	Calendar created and maintained. Aim to attend and run a variety of diverse events across the year.	WCEA	Ongoing
E	Promote key national campaigns such as: Recycle Week, Plastic Free July	Establish baseline for reach of campaigns. Promote 3 national campaigns. Internal 4 vs external 3.	WCEA	Ongoing

2.2	Work with schools to promote waste reduction and recycling.			
A	Develop or engage/contract a programme for schools that compliments and builds upon existing services. E.g. Enviroschools and Landfill Tours	Programme created. Schools on board grows year on year. First year - 5 schools. Second Year 10 schools. Third Year – 15 schools.	SWMO	
B	Create a suite of resources available on our website for Teachers to use.	Resources Created. Download stats. Positive feedback from schools.	SWMO, WCEA	
2.3	Encourage youth led initiatives, programs and campaigns to create change.			
A	Offer help and guidance to the Youth Environment Council to develop campaigns.	Set schedule to meet up with YEC and HYC.	SWMO	
B	Promote the Waste Contestable Fund to youth programs to encourage the development of waste reduction initiatives.	At least 1 applications from youth based projects.	SWMO	
2.4	Develop a Business Program to provide guidance to businesses on how to implement changes to reduce waste.			
A	Develop a business program that works with businesses year on year to reduce their waste. Starting with an initial waste audit, then working with staff to identify barriers to waste reduction and creating a plan together.	Program created. Year 1 – work with 5 businesses. Year 2 – work with 10 businesses. Year 3 – work with 15 businesses.	WMO	

B	Create resources for business on simple steps to reduce waste, and a guide on how to organise a waste audit.	Resources created and feedback received from businesses was positive.	WMO	
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**Goal 3 Increase resource recovery of waste through education and collaboration.**

	Action/mode of engagement	Evaluation Measures	Officer/s Responsible	Timeframe
3.1	Identify problem waste streams and promote preferred disposal options.			
a	Identify problem waste streams through, SWAP survey, visual inspections of loads at Henderson Road and feedback from the community.	SWAP carried out. Problem waste streams identified. Plans developed to tackle problem waste stream.	WMO	
B	Promote the Waste A-Z as the go to guide for disposal. Keep it up to date and add new items as suggested. Look at ways to increase awareness of the A-Z.	10 % Increase in website traffic. New suggestions added within 10 days.	WMO	
3.2	Establish Henderson Road Resource Recovery Centre as a point of resource recovery information for residents.			
A	Create a dedicated space for information on waste reduction, repair and recycling.	Space is accounted for in planning and design of the new Resource Recovery Centre.	WPM	
B	Upskill staff to be confident giving advice on how to sort loads to reduce	Customer satisfaction survey. Mystery shoppers.	WMO	

	waste and guide customers to offload items in different areas for recycling.			
C	Create short repair guides, and videos.	Guides created. Baseline viewing figures built on by 10% each year.	SWMO	

**Goal 4 Lead by example and promote best practice.**

	Action/mode of engagement	Evaluation Measures	Officer/s Responsible	Timeframe
4.1	Share steps Council is taking to follow the principles of the Waste Hierarchy.			
A	Review internal practices and provide staff education on waste reduction initiatives.	Recycling week comms. 3 internal waste stories each year. 2 waste workshops held each year.	WMO	
B	Promote work Council is doing to reduce waste e.g. deconstruction of buildings, progressive procurement	Dedicated section on our website promoting what Council is doing to reduce waste.	WMO	
4.2	Promote community initiatives working to reduce waste.			
A	Share community initiatives to reduce waste through our website, newsletter and any other opportunities.	Section on the website developed.	WCEA	

B	Promote the initiatives carried out from the Waste Minimisation Contestable Fund.	Waste Minimisation Contestable Fund activities promoted. Increase in applicants seen. Targeted promotion to Maori and Pacifica communities.	WMO	
4.3	Encourage businesses to share best practice.			
A	Establish or support industry groups to share best practise.	Tradie Breakfast Sustainable is Attainable	WMO	
B	Continue to create videos showcasing local businesses working to reduce waste.	5 videos created each year. Shared on our website and newsletter.	WMO	
C	Create a section of our website for local business best practice case studies.	Section of website created.	WMO	

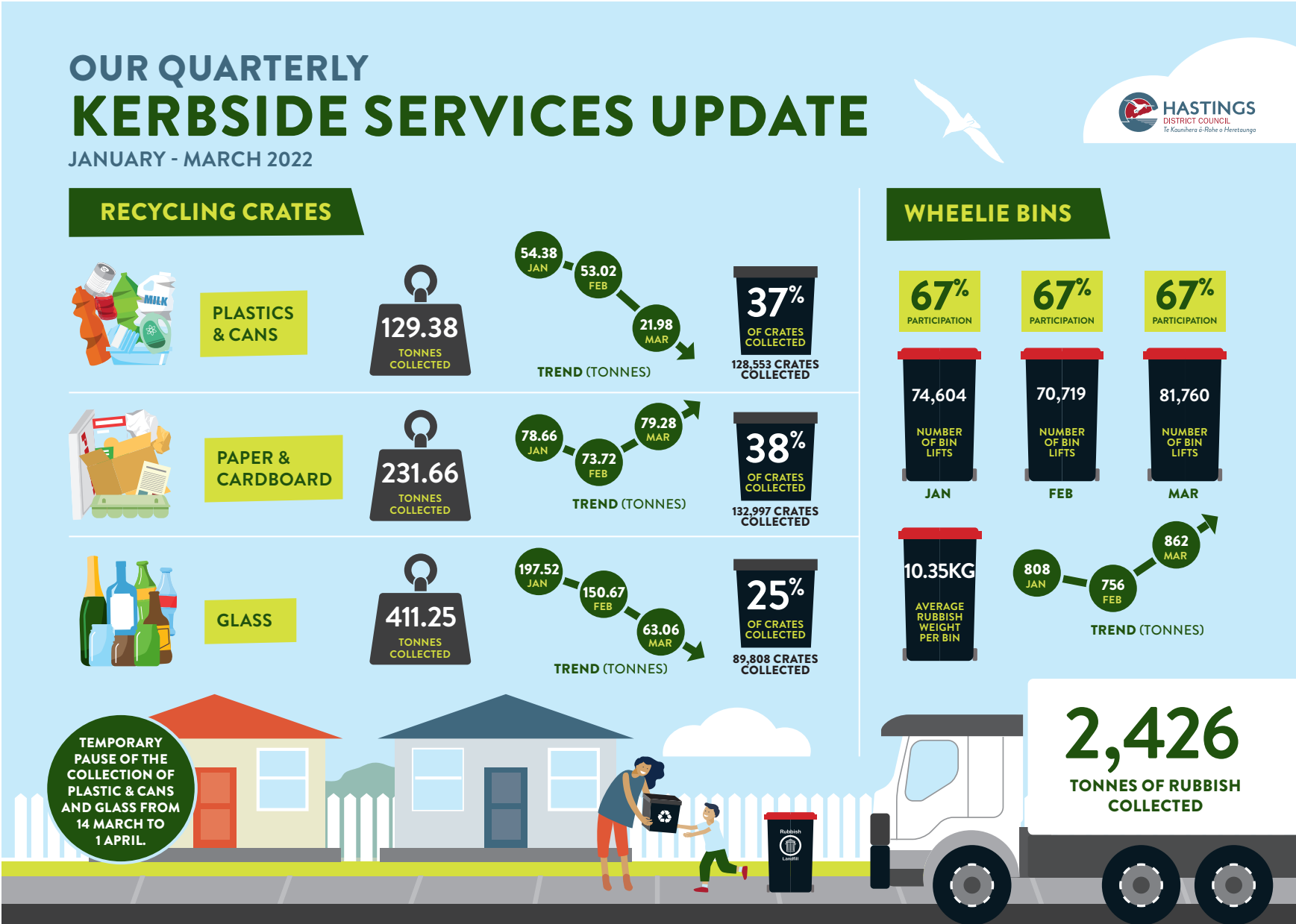


**Goal 5 Help foster a community that cares about reducing waste and living more sustainably.**

	Action/mode of engagement	Evaluation Measures	Officer/s Responsible	Timeframe
5.1	Strengthen relationships with community groups, partners and local organisations so we can support each other on our journey towards Zero Waste.			
A	Arrange regular meetings with partners to keep each other well informed and identify opportunities to work together.	Monthly meetings with Environment Centre, EnviroSchools and Para Kore.	SWMO	
B	Reach out to local community groups to see if there is a desire to deliver waste reduction education and workshops.	5 workshops delivered yearly to community organisations.	SWMO	
5.2	Trial innovative ways of engaging with our community.			
A	Research successful waste reduction engagement campaigns to inspire us to think differently.	To meet annually to discuss these.	SWMO, WCEA	
B	Work with local artists to develop ways of connecting with our community about waste reduction through art. E.g. installations, murals	One project to be delivered each year with the artistic community.	SWMO	
C	Investigate the possibility of holding a show about waste at Toi Toi.	If the show is economically viable. Attended by 200+	SWMO	
5.3	Encourage initiatives that use principles of the sharing economy.			

A	Support local projects that promote sharing e.g. community compost hub	Tools used to promote and support. Dates. Reach/support given.	SWMO	
B	Promote websites that align with the Waste Hierarchy through sharing e.g. Sharewaste and flack.co.nz	Updated links to resources on website. Tools to promote it.	WCEA	







If calling ask for Angela Atkins

File Ref: SW-29-2-22-62

18 May 2022

Transforming recycling consultation,  
Waste and Resource Efficiency Division,  
Ministry for the Environment (MfE)  
PO Box 10362  
Wellington 6143  
*Uploaded as a file via the MfE Citizen Space consultation hub*

**Submission Regarding - Te panoni i te hangarua | Transforming recycling**

Company name: Hastings District Council  
Contact person: Angela Atkins, Waste Planning Manager  
Address: Private Bay 9001, Hastings 4156  
Region: Te Matau-a-Māui, Hawke's Bay  
Phone: 06 871 5000  
Email: [reducewaste@hdc.govt.nz](mailto:reducewaste@hdc.govt.nz)  
Submitter type: Local Government

This submission has been compiled by Officers from Hastings District Council (HDC). It is based on their understanding of the Hastings district community and the benefits and impacts that the proposals in the "Te panoni i te hangarua | Transforming recycling" consultation document would bring to our region.

The short consultation period and existing work commitments of the team has meant that this submission has only been informally shared with elected members. Input from elected members was collected via a workshop held in early April.

As mentioned in previous submissions, longer consultation periods are required to obtain formal Council endorsement. Consultations like this could potentially have a significant impact on local government and elected members are therefore considered key stakeholders. The Ministry for the Environment (MfE) need to be aware that meeting schedules are set well in advance and it is extremely difficult for Council Officers to get important information, such as contained in this consultation, before Council on short timeframes. Financial impacts from the proposed Container Return Scheme (CRS) and food scraps collection will need to be considered by Territorial Authorities (TAs) via Long Term Plans (LTPs).

The submission is based on staff knowledge, feedback received during our Waste Management and Minimisation Plan review in 2018 and a recent short community survey.

HDC waste minimisation staff undertook a survey so that the views of the community could form part of this HDC submission. The survey was shared with the community via the HDC's monthly community newsletter and Facebook posts and was open for two weeks in early April 2022. All of the responses received are attached in Attachment 1. 96 people responded to the survey with a large percentage supporting the proposals. Information from the survey has been included in this submission, including

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breakdowns of stances and comments. The majority of the respondents live in the urban Hastings area (82%), Rural Hawke's Bay (12%), Napier (5%) and one respondent lived elsewhere in NZ.

In general terms we are supportive of the submission made by the Waste Management Institute of NZ (MINZ) Territorial Authority Officers (TAO) Forum. All references to the TAO Forum submission are documented in *italics* and smaller font for ease of reading.

This submission provides comment to the questions posed in the consultation document – “Te panoni i te hangarua | Transforming recycling”.

We do not object to the release of any information contained in this submission.

### **Consultation Feedback and Question Responses**

#### **Part 1: 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.

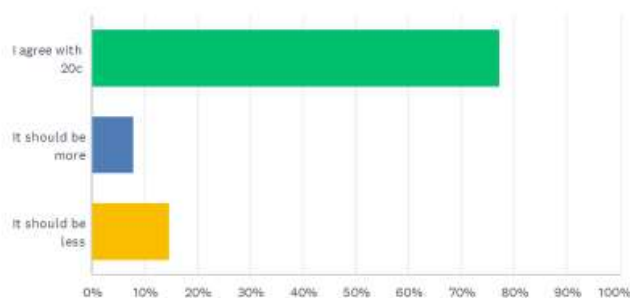
Limiting the scheme to ‘beverage containers’ narrows the scope unnecessarily. The scheme should have a medium term vision to include other containers such as ice-cream containers and jam jars. From the consumers point of view, they’re all just packaging containers, so why not make a scheme that covers them all? The restriction to beverage containers seems to be a way to hold onto the old 1970’s scheme, but has little relevance when starting a scheme from scratch in 2025. It’s important we be reflective of where we are at now in 2022.

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

Yes, and this value is also supported by the respondents of our community survey (see below). 20 cents should be the minimum value at which the scheme commences. There should be a mechanism to review and increase the value to ensure the scheme is achieving the desired outcomes where the refund value is the appropriate mechanism to influence these outcomes.

## Q2 Do you support the proposed refund amount of 20 cents?

Answered: 88 Skipped: 8



ANSWER CHOICES	RESPONSES	
I agree with 20c	77.27%	68
It should be more	7.95%	7
It should be less	14.77%	13
TOTAL		88

### Community comments received via our brief community survey

- \$0.00 x3
- 5c
- 10 cents x 8 - similar to how Australia operates.
- At least 30c x2
- 50c x4 - would be more enticing
- \$1
- NSW Australia set theirs @ 10c, Alberta Canada set theirs @10c for containers < 1L and 25c for containers > 1L
- I don't agree with scheme. It unfairly discriminates against disabled people currently relying on kerbside collections to recycle
- Is it 20c per bottle/item? Where is this refund coming from? Are you going to add a cost to something else rate payers already pay to compensate this refund?
- 10 cents because where does the money come from?
- What about use rural people eg on tukituki rd
- New Zealand loves to promote the 100% PURE NZ. Yet they are so horrible at recycling. We are 30 yrs behind developed worlds. we should be ashamed

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)

We don't feel that it is appropriate to provide direction on this question and agree with the comments of the TAO Forum submission - 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, this is crucial to drive more sustainable packaging design decisions. The use of an eco-modulation/variable scheme fees will ensure the producers/users of materials that are more expensive to reprocess, will pay the true costs. We also support the comments made by the TA forum.

*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, and we also support the use of the materials collected used in the bottle to bottle recycling/use.

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

Pouches and bladders (like drinkable yoghurts) should also be included, industry doesn't have time to design them out. This would then allow the scheme to be expanded in the future to include other bladder packaging like baby food.

For those pouches and bladders that are made of multiple materials, the eco-modulation/variable scheme fees will drive change if the industry is unwilling to pay this additional cost. This is no different to liquid paperboard cartons.

It needs to be acknowledged that the use of pouch and bladder packaging is well established in response to a packaging need being much lighter and probably easier and more economical to transport. This means that they are unlikely to be dropped as a packaging type.

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, and we support the comments made by the TAO Forum.

*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, and we support the comments made by the TAO Forum. Having fresh cow milk as a special case is confusing and adds complexity to the scheme unnecessarily. If fresh cow milk bottles are not in the scheme, how will their collection and processing be paid for? The scope should be wider and the scheme must include all beverage containers sold in New Zealand, including milk bottles.

*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, if there is going to be a CRS, then it should cover everything and we support the comments made by the TAO Forum.

*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 (e.g. plastic milk bottles and liquid paperboard containers) a priority product and thereby including them within another product-stewardship scheme?

No, and we support the comments made by the TAO Forum.

*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 scheme should find a way of subsidising the use of refillable containers. If they are not subsidised then their use will be very limited.

New Zealand needs to foster the uptake in the use of reusable alternatives and refusal towards the production of single use items, this includes packaging. The CRS could be seen as starting at the wrong place - as it doesn't drive change away from single use packaging. We are still incentivising producers to put things in bottles, and then expecting consumers to pay to recycle them. We should be encouraging refilling. We would prefer a strategy that is driving change towards refilling and discourages the production of more plastic.

We also support the comments made by the TAO forum.

*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 (e.g. a refillable target)?

Yes, and we support the comments made by the TAO Forum.

*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?

The use of financial incentives for businesses to convert to refillable containers and national behaviour change campaigns funded from the profits that the scheme makes. Rather than returning these profits to the producers. We also support the comments made by the TAO Forum.

*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, at a minimum 5 litres or smaller should be the size of the eligible containers. There is a wider range of water containers and others (non-beverage containers like cooking oil that could be included in the future). We support the comments made by the TAO Forum.

*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, as it will lead to liquid being collected as bottles will not be fully emptied. We also support the comments made by the TAO Forum.

*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(s) for lids. We would like to emphasize the need to expand the scheme to include difficult to recycle items like soft plastics sleeves.

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, and the "Not for profit managing agency" should own and operate all CRS return machinery. Site safety needs to be considered for retail participation, e.g. small stores may only have staff member working, leaving the store unattended while processing returned containers.

We support the comments made by the TAO Forum.

*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)

Consideration needs to be given to rural communities e.g. here in Hastings, Maraekākaho and Kereru have a successful convenient rural recycling station for this rural community. Rural communities will need to take their containers further afield and make it more complicated for them. We could rely on a school as a hub, but this facility will need administration, it adds a security risk for the school, etc.

We also support the comments made by the TAO Forum.

*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)

Yes, but it should be acknowledged that not all small dairies and some larger retailers have sufficient floor area or storage space to securely store the returned containers. Exemptions may be required in this circumstance. In an ideal world the scheme would have all beverage retailers participating as return points, this is not likely in reality.

*The Forum recommends that all retailers that sell beverages be regulated as part of the scheme however understand this may not be feasible from the onset.*

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)

Yes, acknowledging that there needs to be rural access to the CRS but this could take many forms, and the onus should not be on a small retailer that may not have a secure storage space. There could be the potential to run a mobile collection service in remote rural locations, with a portable reverse vending machine. Schools and other organisations may want to step in to collect the containers back.

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, a minimum volume of beverage containers sales could be another exemption for small retailers along with site security concerns raised above. We support the TAO Forum comments also.

*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, and we support the comments made by the TAO Forum.

*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?

Yes, and we support the comments made by the TAO Forum.

*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 will have broader goals than simply achieving high return rates for example procuring the depot network and supporting the refillables market. 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, but the regulations need to outline the required actions/penalties of not meeting those targets and what are the medium and long term options for broadening the scope of eligible containers. Long term the CRS should be seen as a replacement to kerbside collections for all containers with the possible exception of fibre.

*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, and we support the comments made by the TAO Forum. Collection methodology could definitely be a barrier in rural locations. Before increasing the deposit we would want to see that a review of collection methodology had taken place.

*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, we are supportive of a CRS, if it also supports refilling, progression up the waste hierarchy and there is an agreed approach to expand the scheme in the future to include all containers, so that a CRS does not leave stranded materials and streams for Councils to collect.

Council's position is to do it consistently and over the widest possible range of products/materials (beyond bottles).

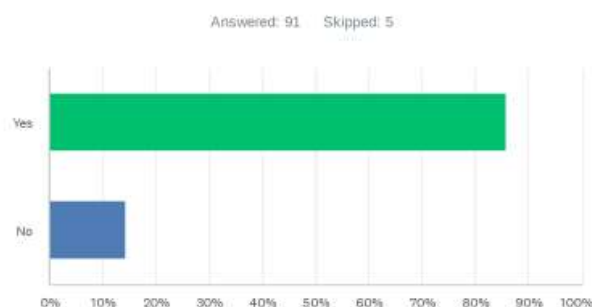
We do have concerns it will create a parallel recycling collection system that will make the existing kerbside services expensive and difficult to manage for the abandoned materials. The CRS proposal is silent on the impact that CRS will have on kerbside services and the consultation period does not allow for Councils to undertake financial impact assessments. The last minute extension has only provided more time to complete a written submission rather than undertake any impact assessment(s).

We also request that detailed work is undertaken to cover the dis-benefit of scavenging of containers from collection services. Scavenging already occurs of aluminium cans from our kerbside recycling collection. The volume of the cans collected can be significant as it is relative to the high value of aluminium. This aspect should be included in the regulations.

Council Officers have received comments from members of our community who live with disabilities and the concern that they will not easily be able to access the scheme as they currently rely on the kerbside collection service. We request that input is obtained from the disability sector prior to the scheme being finalised.

The respondents to our brief community survey were also supportive (in principle) of the implementation of a CRS scheme.

#### Q1 In principle would you support the implementation of a Container Return Scheme for New Zealand?



ANSWER CHOICES	RESPONSES	
Yes	85.71%	78
No	14.29%	13
TOTAL		91

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?

The success of the CRS relies on the assumption that range of eligible containers is extended. If not, NZ will be running two systems (CRS and kerbside collection), where councils are left to collect a stranded stream via a very ineffective service model, both financially and environmentally expensive. Although MfE assumes that the CRS fees will offset some of the cost to continue to provide a kerbside recycling service.

If the scheme is not easy to use, we risk having a double cost on people. Where they continue to rely on kerbside recycling collections. There needs to be more emphasis and public awareness of the fact people are already paying to get rid of stuff - kerbside collection is a cost & rubbish disposal has a cost.

If Council doesn't collect the "stranded" stream, these items will more than likely end up as general rubbish and disposed of at a landfill.

No detailed assessment on how CRS will affect viability of kerbside collections services has been provided to Councils and the limited time to prepare a submission did not leave sufficient time for this work to be undertaken by TAs. We too have requirements under the Local Government Act requiring Councils to consult with their communities on services that will impact them.

If Council runs a depot (large volume drop off), will every bottle need to be identified? The scheme will need to cover this cost and risk, not the Council or the MRF.

We also support the comments made by the TAO Forum.

*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, we have achieved this in Hawke's Bay and this approach was supported by our survey respondents. Consideration needs to be given to smaller Councils who may not have the funding or resourcing available to implement this change quickly as the CRS is likely to impact the volumes that they collect and the services they continue to deliver. It should be acknowledged that CRS may make it uneconomical to provide kerbside recycling services. So is this the right time to be reviewing this if kerbside collections are made redundant through a broadened CRS

Alternatively the collection and processing could be funded by retailers, producers and importers under a product stewardship scheme. Thus removing the burden from rate payer, especially those that are low users due to lifestyle, e.g. elderly, low waste producing households, low occupancy households.

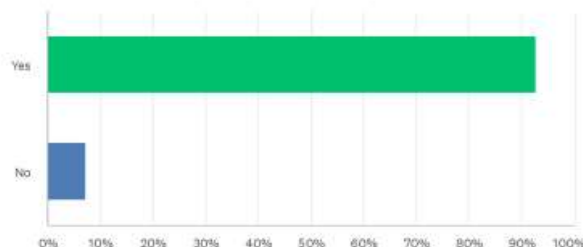
We also support the comments made by the TAO Forum.

*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.*



Q4 Do you agree in principle that all Councils across Aotearoa New Zealand should collect the same items for recycling?

Answered: 83 Skipped: 13



ANSWER CHOICES	RESPONSES	
Yes	92.77%	77
No	7.23%	6
TOTAL		83

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, and we support the comments made by the TAO Forum should it be viable for kerbside collections to continue past the introduction of CRS.

*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 unfortunately not, the sector has attempted to encourage a voluntary approach to bring consistency amongst Councils services - but this has been difficult on many levels as each Council has different drivers and pressures. We support the comments made by the TAO Forum.

*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).

All materials.

*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, 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?

No, TAO Forum has highlighted that some Councils struggle to find markets for pizza boxes and coloured PET. HDC doesn't have issues with pizza boxes as they are accepted by our local end user, Hawk Packaging. We are aware of a local end user of coloured PET in Hastings but the challenge to getting the post-consumer material to a quality for them to reuse it. Our understanding is that they could use a good proportion, if not all of the NZ post-consumer coloured PET but the lack of intermediary processing is prohibiting this. This infrastructure gap needs to be addressed with urgency. It has been talked about for many years with no action.

*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?

We are uncomfortable about aerosols being excluded. The collection of aerosols is working now being included in kerbside collections, surely MRFs could separate them out further as to not contaminate other metals. People will not take them to a recycling depot and they will end up in the rubbish bins. The exclusion of aerosols is likely to result in strong criticism for the community making recycling too hard.

Materials like soft plastics and Liquid Paper Board should be collected via a product stewardship scheme where producers pay the full cost for the material.

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

Yes, and we support the comments made by the TAO Forum.

*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*

Plus the location of any required processing facility and mandatory financial input from the producers/importers to offset collection and processing costs.

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).

*We support the view of the TAO Forum - 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, and we support the comments made by the TAO Forum.

*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, in principle, we are supportive of reducing food waste, where possible and in compliance with bio-security rules and public health protocols. Landfills are often required to dispose of imported food stuffs (biosecurity risk) and processed food (public health risk). These materials should be able to be

diverted to other processing facilities in the future, but will require strict controls to prevent potential breaches.

We would like to better understand the infrastructure investment from government to provide facilities, or alternatively, invest in existing infrastructure to ensure we don't end up in a situation where processing sites are non-compliance and material can no longer be treated.

If government want food scraps collection they need to be responsible for the full service, including collection, processing and reuse of.

Based on the information provided our councillors are hesitant to support the collection of food scraps.

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?

No, Central Government should cover the costs of an opt-in food waste service. The collection should not affect rates and could be paid for through the Waste Minimisation Fund via large national contracts. Many residents already manage their food and garden waste at home. If it was a free service you would get residents who want to manage their food scraps signing up to it. Which means you can optimise routes for collection. Contamination is a big issue for food waste, so having those that are committed to it will help collections. You would expect with ongoing behaviour change education, that you would see an increase in uptake of the collection over the coming years. But a blanket service for a majority that doesn't want it seems wasteful - extra bins and extra trucks, extra emissions.

There was a low level of support from our brief community survey supporting a Council provided food scraps collection. Officers were also contacted by elderly residents who were concerned they would be burdened with an additional cost they didn't need, like this example from a Hastings resident:

*I just wanted to say that I strongly oppose the mandatory kerbside collection of food scraps if it means that councils will just add this cost to the rates bill. I compost all my food and greenwaste scraps for a family of 4 on a 700sq m section in parkvale. While I understand that some people are not in a position to be able to do this, there are a lot who are but choose not to. Why should I make the effort if I am going to be charged for everyone else's waste management?*

*If there is a local council scheme to opt in / out then I'm all for it, but a blanket fee added to everybody's rates is unfair. Using this scheme as a 'feel good' approach to reducing climate change is a bloody joke when in 2020 we IMPORTED over a MILLION TONNES of coal - primarily for electricity generation. I don't have the figures for last year but it was projected to be 15% higher.*

*Don't punish the people who are trying to do the right thing.*

There are other options for diverting food scraps in provincial New Zealand, including allowing the private sector to cover this.

With Long Term Plans (LTPs) only set in June 2021, many Councils have already set their services for the next three years and another kerbside collection service will be significant increases to rates for many. This will be juggled with other competing infrastructure investment and inflationary pressures at the time that the next LTP is adopted.

There are many other organic materials being disposed of to landfills, such as timber and fibre, so why aren't these materials also being included or at least acknowledged in this consultation.

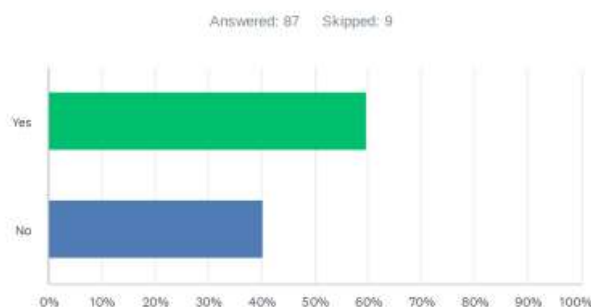
We also support the comments of the TAO Forum.

*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.*

#### Q5 Do you agree in principle that all councils should provide a mandatory weekly kerbside food scraps collection to divert as many food scraps as possible from landfills?



ANSWER CHOICES	RESPONSES	
Yes	59.77%	52
No	40.23%	35
Total Respondents: 87		

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?

No, as per question 42 and we acknowledge the comments made by the TAO Forum. Another way could be a minimum percentage measured via SWAP surveys as a trigger.

*The Forum supports mandatory collections in urban areas if sufficient investment and time is provided to TAs to incorporate this service. The Forum 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, even if they currently provide kerbside collections. There are significant funding issues for additional rural kerbside services due to the large distances involved. Alternative approaches should be explored and supported for local solutions in these communities.*

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, and we, along with many other Councils already provide many of these incentives to our community. Green waste drop off at our Transfer Station is \$117.30 per tonne compared to \$295.55 per tonne for general rubbish. Bio Rich also offer a green waste drop off facility priced at between \$10-\$20 for a car or trailer load. HDC would be happy to promote and educate but don't see it the role of Councils to collect or fund garden waste collections. We support the comments made by the TAO Forum and feedback from our community highlights that they can manage their green/garden waste other ways. The results in our short community survey indicate that two thirds of our community have their garden waste managed already. These results are similar to the results that we gained from our 2018 WMMP consultation which received over 6,000 across Hastings and Napier regarding proposed kerbside services.

This is also backed up by the research collected by MfE in March 2022 looking household disposal of garden waste. Where only 12% of respondents use their rubbish bin as the main way to dispose of garden waste.

*If you place your garden waste in your rubbish bin, why do you do so?*

	Frequency	%
<i>I have very little garden waste</i>	224	19.3 %
<i>It's too expensive to hire a green waste bin</i>	96	8.3 %
<i>I don't have room to compost</i>	87	7.5 %
<i>You are not supposed to compost this type of waste e.g., infected fruit, weeds</i>	104	9.0 %
<i>Other</i>	34	2.9 %
<i>I don't place garden waste in a rubbish bin</i>	734	63.2 %

Source: <https://environment.govt.nz/facts-and-science/waste/research-into-attitudes-to-waste-and-recycling/#household-disposal-of-garden-waste>

When looking into why households do this, if you remove the responses for – “I don't place garden waste in the rubbish bin” – you get this:

	Frequency	%
I have very little garden waste	224	41
It's too expensive to hire a green waste bin	96	18
I don't have room to compost	87	16
You are not supposed to compost this type of waste e.g., infected fruit, weeds	104	19
Other	34	6

From this you can see that 60% of respondents using the rubbish bin have very little garden waste or are doing so because you are not supposed to compost this type of waste. There is 6% other. Then of the remaining 34%; 16% don't have room to compost and are unlikely to have room for another bin and 18% can't afford it.

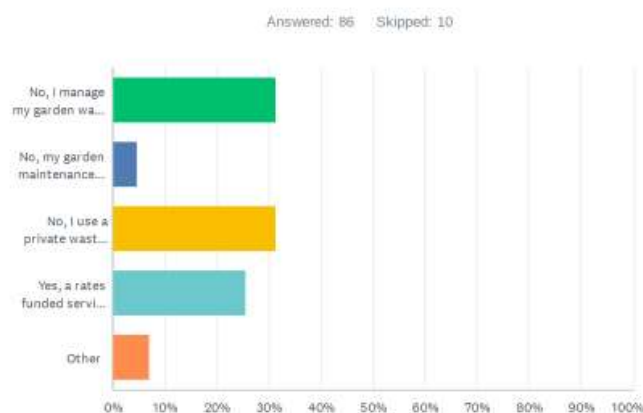
Really this shows that the only gains to be had is from a small percentage of people who can't afford another service and people who likely don't have room. Overall, it looks garden waste is being managed well by the services currently available.

*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.*

**Q6 The Joint Hastings and Napier Waste Management and Minimisation Plan and Council's position is to leave the service provision of green waste services to the private sector. The Government's consultation documents do however consider other scenarios in managing this waste. How do you think it should be managed, if at all?**



ANSWER CHOICES	RESPONSES	
No, I manage my garden waste myself already	31.40%	27
No, my garden maintenance service does this for me	4.65%	4
No, I use a private waste operator and this meets my needs	31.40%	27
Yes, a rates funded service for all urban residents	25.58%	22
Other	6.98%	6
TOTAL		86

*“Other” answer comments from the community survey*

- *A rates funded service AND private waste services.*
- *Our household composts as much as possible but a private waste operator takes grass clippings and small branches.*
- *I currently pay for my own green waste bin, a subsidy would be great but not everyone needs it*
- *Leave for the green waste collection i.e. service with the private sector businesses*
- *We have always composted food scraps & believe that everyone should try to do that if not in their own home, perhaps a community based garden compost bin. We also pay for a private green bin collection for large garden pruning etc. Still happy continuing that. I do not want to pay for the Council or believe the Council needs to take food waste on - people should buy less, use more carefully & take responsibility for their own food/ green waste. Thank you*
- *It should be possible to opt in or out of any council waste service. Pay by use schemes should be available. I would want to know the costs of a council scheme and have the right to choose the cheapest option.*

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?

No, and we don't support Councils providing a rates funded food scraps collection service.

It needs to be noted that 2025 would be too soon for Councils who have access to existing infrastructure but have not started the process to provide a kerbside food scraps collection service. This service has not been included in Councils LTP process (1<sup>st</sup> step) and the next opportunity for this is in 2024. The next LTP would be adopted in June 2024, 12 months would then be required for the procurement processes (2<sup>nd</sup> step) required. Then an additional 12 months for the successful provider to get the trucks and bins arranged (3<sup>rd</sup> step). The earliest that a food scraps services could commence in this situation (for Hastings District Council) is July 2026 should the Council agree to this service.

We also support the comments made by the TAO Forum.

*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.

No, as above that is not enough time.

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, and we support the comments made by the TAO Forum.

*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.

The Ministry for the Environment have been contacted by Biorich who have advised they have resource consent, capacity and interest in accepting waste from household food scraps collections. As Hastings District Council falls within a 150 km radius of their facility, this means that under the current proposal HDC would have until the end of 2025 to roll out a food scraps collection. As commented in Q45, this does not give us enough time to plan, set-up and roll out a food scraps collection.

We also support the comments made by the TAO Forum - *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 – coffee bags (similar to tea bags) and we support the comments made by the TAO Forum. Consideration should be given to the ease of use by residents of a food scraps collections, e.g. could the use of a sheet of newspaper or a paper towel be used to line a bin to ease with the free-flow of the material when collected, making the bin easier to clean and a more appealing to use.

*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 taking non-food products will lead to confusion and contamination of the compost product.

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.

No

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

Yes, and we support the comments of the TAO Forum.

*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, and we support the comments of the TAO Forum. There will be challenges in reporting this level of data where a collector works across political boundaries and sectors. Here in Hawke's Bay many of the operators (who provide wheelie bin collections) service both Hastings and Napier addresses and both commercial and residential bins in the same truck, on the same run. All of the combined rubbish is disposed at landfill at the end of the run in one load. There would be no way to record this data accurately until pay by weight/on-board truck scales are developed and their use is wide spread. This technology was not readily available in Europe in 2019 when Hastings tendered the new kerbside collection contracts.

The responsibility for compliance of the private sectors reporting needs to sit with MfE not Councils.

*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, and we support the comments of the TAO Forum.

*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, as commented by the TAO Forum.

*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)?

In principle we support reporting and minimum standards, however it needs to be acknowledged that smaller rural Councils are probably not resourced sufficiently to undertake regular reporting. The use of waste levy money allocated to Councils should be made available under the legislation to be permitted to be spent on employing permanent staff to meet such resourcing needs as this. Some Councils may struggle to resource this area otherwise. It will also be hard to measure as there are so many different services throughout Aotearoa New Zealand.

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

The proposed formula for measuring diversion rate doesn't seem to take into account households that are actually trying to move up the waste hierarchy. Those that may be managing all their food waste at home, refilling and reusing containers instead of putting out lots for recycling. Just putting out a bag of rubbish. There needs to be a clear idea of what will happen when CRS comes into effect and takes a lot of weight out of the recycling as the diversion rates would drop. Ideally SWAP surveys should be used as a better barometer of where we are. What's left in the rubbish that could be diverted?

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?

It depends on what the target is and the agreed formula post consultation, as the proposed formula is flawed. We also support the comments made by the TAO Forum.

*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?

We are unsure a target alone would encourage best practice. It would be good to understand what the definition of best practice includes and the reward(s) for achieving and maintaining this target. We also support the comments made by the TAO Forum.

*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, and we support the comments of the TAO Forum.

*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?

Unsure, and support the comments of the TAO Forum. Another option could be for a government agency to temporarily take on the service delivery to get it to a point where it meets the set standard.

*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, we support the collection of materials separately, this is the collection methodology currently used by Hastings District Council for both kerbside and drop off recycling services. It could be that in the future there will be no glass kerbside collection if the CRS is successful and expanded. This would void the suggested requirement.

We also support the comments made by the TAO Forum - *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.

This is okay for HDC as we already separate, but an unreasonable request for those that aren't currently separating as there is a big risk with the unknown impact of the CRS. The CRS should contain a phasing to be expanded to include all packaging with the exception of fibre which could be covered by a producer funded collection service, possibly still kerbside.

If a CRS is introduced HDC may reduce kerbside recycling to fibre only due to the potentially uneconomical situation with low volumes of other recyclables to collect.

We also support the comments of the TAO Forum.

*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?

In principle yes, but how are MfE proposing to require Councils to fund services that the elected members might not want to fund? It will vary dramatically from Council to Council in ability and capability to do this.

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

In principle yes, but consideration needs be given to remote locations where collection costs for 1000 people could potentially be very high. These smaller Councils also have less waste levy funds to use to possibly offset the costs from rate payers.

We also support the comments of the TAO Forum.

*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?

In principle yes, depending on the adoption of the following LTP (also as mentioned by the TAO Forum) and procurement/resourcing timeframes. It will vary dramatically from Council to Council in ability and capability to do this.

*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?

We support the ideas of the TAO Forum detailed below.

*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**

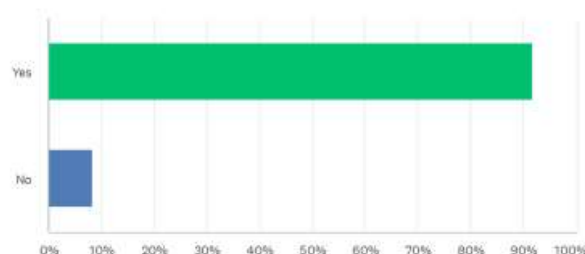
68. Should commercial businesses be expected to divert food waste from landfills as part of reducing their emissions?

Yes, this will align the business sector with the residential sector and was supported by our brief community survey. Additionally there needs to be a requirement for all businesses to recycle dry recyclables as well. Discussion on the subject remains silent.

We also believe that schools should be included in the requirement to divert food waste. Schools need to be provided with funding so that they can divert recycling and food waste from landfill. Currently many schools in our area cannot offer these options because of a lack of funding. It makes sense to have a national programme to fund recycling and organics in schools. Contracts could be managed regionally at an Ministry of Education Officer level, with support from local TAs.

Q7 Do you agree in principle with the proposal that commercial businesses be expected to divert food waste from general waste?

Answered: 84 Skipped: 12



ANSWER CHOICES	RESPONSES	
Yes	91.67%	77
No	8.33%	7
TOTAL		84

This is supported by feedback from a local resident:

*I work in the Early Childhood Education sector and consider my role is to educate the tamariki about respect, and to encourage our young tamariki to become guardians of Papatūānuku, Ranginui and Tangaroa. Yet, everyday I see kilo's of food waste from our kitchen, where the daily meals are prepared, going into the bin. What is this teaching our tamariki? I feel this scenario is happening in many ECE centres across the region. As with so many businesses, we are burdened with Health and Safety policies, and recycling and reducing waste is in the 'too hard basket!*

*Also, our kaiako make little effort to recycle and reduce, and it is only recently, upon my purchase of recycling bins, that some of our paper, cardboard and plastic waste is being separated from the bins that go to the landfill. I am on a mission to better educate our kaiako so that they can become role models to the tamariki, but it is a huge undertaking and one, I feel, I can't do on my own.*

*Therefore, the easiest way forward would be the provision of food waste bins and support in training staff. Let us show the way for our children - who are our future. As our Curriculum Te Whāriki is underpinned by the vision that children are "competent and confident learners and communicators, healthy in mind, body and spirit, secure in their sense of belonging and in the knowledge that they make a valued contribution to society." That contribution could make all the difference to the district of Heretaunga and the wider world.*

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

Yes, and we support the comments made by the TAO Forum.

*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, as commented by the TAO Forum.

*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?

Yes, and for this question our views differ to that of the TAO Forum. Hawke's Bay is home to large food producing companies and the volume of food waste that is landfilled by these businesses would be reduced/eliminated if there was a national requirement to divert this material to other beneficial reuse options/facilities. At the moment landfill is the cheapest option and the infrastructure is limited to de-package.

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

No, and we support the comments made by the TAO Forum.

*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 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?

We support the comments made by the TAO Forum.

*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.*

Nāku iti noa, nā

Nigel Bickle  
Chief Executive



Transforming  
Recycling Consultatio