



Submission of Civic Trust Auckland

Waste Strategy: Taking Responsibility for Our Waste

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Civic Trust Auckland

Civic Trust Auckland (CTA) is a non-profit public interest group, formed in 1968, with activities and interests throughout the greater Auckland region.

The aims of the Trust include:

- Protection of natural landforms
- Preservation of heritage, in all its aspects
- Encouragement of good planning for the city and region.

We have submitted on the [Emissions Reduction Plan](#), on [Managing Microbeads in Personal Care Products](#), and the [Draft Auckland Waste Management and Minimisation Plan](#) (and many other submissions on a range of matters). We have read the Waste Reduction Work Programme, which we support, and we have read the consultation document: Waste Strategy: Taking Responsibility for Our Waste.

Our submission comments in general as well as on particular aspects of the Waste Strategy and answers some of the questions posed, the latter indicated by the use of *italics*.

We strongly support the government having a Waste Strategy and a series of supporting action and investment plans, and in general, we support the proposals in the document.

1. Food Waste

(a) CTA is of the view that measures to tackle food waste should be implemented as a priority. As noted on page 12 of the Waste Strategy, disposal of organic waste makes up 9% of Aotearoa New Zealand's biogenic methane emissions and 4% of total emissions. The recent Intergovernmental Panel on Climate Change report makes clear the urgency of reducing methane emissions as part of our response to the global climate crisis. We therefore need to reduce the amount of food waste that ends up in landfills and elevate recognition of the vital co-benefit from doing so.

(b) Much of organic "waste" is useable food, in large part, suitable for human consumption, with much of the rest suitable for consumption by other animals.

(c) There are many agencies as well as voluntary community groups working hard to redistribute edible food. This includes a number of community pantries and fridges around the country, such as those within the Pātaka Kai movement:

<https://www.patakai.co.nz/>

(d) These pantries could be better publicised, including on the GenLess website, so more individuals and businesses would know where they can donate their unwanted food, and more individuals/schools/churches/businesses would be able to set up their own pantry/fridge. This is a way of reducing waste as well as empowering the community, at little cost to the government and with much gain for the environment and the population.



(Image - Pātaka Kai)

(e) CTA agrees with banning key organic materials such as food, green, and paper waste from Class 1 landfills by 2030, as proposed in the Emissions Reduction Plan (page 103).

(f) We agree with changes to the waste disposal levy, which may reduce emissions by providing an economic incentive to reduce waste to landfill and divert and recycle organic materials (as per the Emissions Reduction Plan).

(g) CTA supports community education in order to reduce food waste from each household. It is unacceptable that one-third of all bought fruit and vegetables are thrown away. People need to be encouraged to reuse meal leftovers as well.

(h) Waste from places that sell food, such as restaurants, cafes and supermarkets, should be made available for human consumption (or other animal consumption if not suitable for humans). We support this petition to this effect, which has recently been launched by a community group that feeds homeless people:

https://www.parliament.nz/en/pb/petitions/document/PET_116692/petition-of-sunday-blessings-implement-legislative-policy

2. Education

(a) As signalled on page 17 of the Waste Strategy, much material (in addition to food) sent to landfills would be relatively easy to reuse or recycle, and initiatives to do this should be publicised and supported. This includes hospice shops, garage sales, and market stalls selling second-hand goods. Councils and businesses could be

encouraged and incentivised to support reuse and recycling, such as local boards supporting a second-hand goods stall at markets.

(b) We suggest that the GenLess site needs more publicity so that more people will be able to access the practical tips about reducing waste.

3. Initiatives, Vision, Principles and Priorities

(a) CTA supports the key initiatives on page 20, namely:

- investing in resource recovery infrastructure
- expanding the waste levy from \$10 to \$60 per tonne by 2024 for municipal landfills, and applying it to a wider range of sites
- publishing a National Plastics Action Plan and phasing out single-use and hard-to-recycle plastic products
- regulating product stewardship
- supporting industry and key sectors to reduce construction and demolition waste and divert material from landfill.

Question 1. Do you think changes are needed in how Aotearoa New Zealand manages its waste? Yes, definitely.

Question 2. Do you support tackling our waste problems by moving towards a circular economy? Yes, absolutely.

Question 3. Do you support the proposed vision?

Yes, we strongly support the proposed vision as outlined on pages 25, namely:

- A circular economy for Aotearoa New Zealand in 2050
- We look after the planet's resources with care and responsibility
- We respect and understand our inseparable connection with the environment
- A land where nothing is wasted.

Question 4. Do you support the six core principles or would you make changes?

We strongly support the six core principles outlined on pages 26-27, namely:

1. Design out waste, pollution and emissions, and unnecessary use of materials.
2. Keep products and materials in use at their highest value.
3. Regenerate natural systems, so the environment is healthy for future generations.
4. Take responsibility for the past, present and future condition of our natural environment.
5. Think in systems, where everything is interconnected.
6. Deliver equitable and inclusive outcomes.

(b) We also support the main priorities proposed on pages 31-32, which do need the targets (Table 1, page 38) to assess progress, as, in general, the priorities are not specific or concrete.

(c) We feel that the wording of the priorities could perhaps reflect the fact that some individuals and organisations (including businesses) are already doing very good work with regard to waste and that perhaps these good examples could be regularly publicised in the media. For example, “Change social and cultural attitudes” (page 32) would perhaps be better as “Change social and cultural attitudes where necessary.” Also, we note that the use of the idiomatic phrase “Break the back” would not necessarily be understood by those for whom English is not their first language.

Question 5. Do you support the proposed approach of three broad stages between now and 2050, and the suggested timing and priorities for what to focus on at each stage? Yes, we do.

4. Recycling

(a) The headline action of “Introduce consistent labelling standards to make it easy for people to know what to do” with regard to recycling would seem to be practicable and important, as there is a lot of willingness to recycle but often confusion about what should go in which bin, both for domestic waste and the public bins around the country. However, we caution against standardising residential kerbside collections if this would mean replacing some bins with new ones and lead to more waste and unnecessary use of resources.

(b) Managers/bodies corporate of multi-unit housing like apartment buildings should be encouraged/incentivised to have food waste bins and shelves for unwanted items in their rubbish/recycling areas. Some do and others can learn from them. There needs to be support, perhaps in the form of posters with pictures rather than words which clearly show what goes in the different bins.

(c) CTA agrees that it is important to encourage the development of uses and markets for recycled material, so resource recovery and recycling become financially sustainable.

(d) We support resource recovery centres and think there is more scope for support of them by local boards. Such centres enable items to be reused and recycled, preventing them from going into landfill.

5. Building Waste

(a) We support requiring waste minimisation plans as part of the consenting process for building and development projects. Instead of sending buildings to landfill and building new ones to replace them, they should be refurbished, retrofitted, and their lives extended, for example, by having more storeys built on top of them or being lifted up so there can be more floors underneath them. As well as saving waste from demolition, this saves on materials for building new houses.

(b) New Zealand has a long history of relocating buildings. Rules to require relocation as a condition of consent for a new build should be instigated. Too much practically useful building stock is going to landfill, and it is unacceptable that, in many cases, these are beautiful native timbers.

(c) The lifespan of buildings should be prolonged by designing them so that they can be easily repaired: by using modular components, designing for disassembly, making use of extended producer responsibility agreements, and ensuring smart, performance-based maintenance schemes. Buildings should be designed to stand for hundreds of years rather than decades, as is currently the case.

(d) CTA would like to emphasise that adaptive reuse of heritage buildings, as well as buildings in general should also be considered in the first instance.

6. Stage One Actions

Question 8. What are the barriers or roadblocks to achieving the stage one actions, and how can we address them?

A barrier is lack of awareness and understanding, and the strategy does include education campaigns, which are very necessary. These could be through media stories and through schools, and government websites such as GenLess. Another barrier is the type of advertising that encourages people to buy goods that are not necessary. Credit cards can also be a problem, enabling people to impulse buy and purchase things they do not need.

Question 9. Do the strategic targets listed in Table 1 focus on the right areas?

We think the targets focus on the right areas but to reduce waste generation by 5-10% per person by 2030 seems a very low target.

Question 10. Where in the suggested ranges do you think each target should sit, to strike a good balance between ambition and achievability?

Without suggesting numbers, CTA would like to see the targets set as high as possible.

(a) As regards whether there should be, rather than a separate, dedicated waste management and minimisation plan, a plan included as a specific component in long-term plans, we think local authorities should have a say on that, as they will know what would work best for them.

(b) We think that local authorities are best placed to provide collection and recycling services and disposal facilities and how they should be delivered, and that this is something they should be doing, while central government focuses elsewhere.

Questions 11 & 12. Do you think the new legislation should require the government to have a waste strategy and periodically update it?

Yes, we definitely think there should be a waste strategy and that it should include monitoring and a performance review, and that it should be reviewed at least every three years. We would like to think that it would survive any change in government.

7. Litter

(a) The Litter Act enforcement provisions could be strengthened, and if other countries have had good results from encouraging members of the public to report waste offences, then this would presumably also work in Aotearoa New Zealand.

(b) It does not make sense that the process and maximum penalty in the WMA are the same for someone providing a banned plastic shopping bag and a landfill facility deliberately misreporting its tonnages to evade waste levy obligations. We agree that the range of offences and penalties needs to be wider. We support expanding the tools to manage non-compliant behaviour to include statutory warning letters, enforceable undertakings, infringement processes, restorative justice approaches and a range of low- and high-level offences.

(c) We support banning placing flyers on cars, the phasing out of junk mail and the cessation of the practice of labelling individual pieces of fruit and vegetables.

(d) CTA supports strengthened legislation and compliance monitoring and enforcement tools, phasing-out – sooner rather than later – hard-to-recycle and single-use plastics, regulated product stewardship schemes and a container return scheme.

(e) As for penalising companies when packaging from their products has become litter, potentially through a fine, we suggest the fines could depend on the type of packaging. It would seem unfair to fine a company that uses biodegradable packing but ends up as litter due to irresponsible consumers.

(f) We note that the approach to littering from a vehicle in New Zealand used to be that the owner of the car would be posted a litter bag to use in the car. (Unfortunately, in those days, the bags were made of plastic; these days, if the practice is reintroduced, the bag should be made of some other material.)

(g) We support the basic obligation on all people to dispose of waste appropriately (page 55). We note that cigarette butts should become much less of a problem once Aotearoa New Zealand becomes smokefree in 2025 and that with the intention to reduce packaging and single-use items, the scale of littering should decrease.

(h) We recognise unlawful dumping as a problem that not only means a territorial authority must do a cleanup, but, depending on where the dumping takes place, it can be a blot on the landscape that can also affect tourism, or a constant stress and cost for business, community groups and households to have to regularly dispose of someone else's rubbish.

(i) As per page 55, if international research shows the most effective way to reduce litter is to change attitudes, awareness and behaviour through education, incentives, building community engagement and ownership of the problem, then that is what Aotearoa New Zealand should do too.

Question 20. Do you see benefit in adapting the United Kingdom's duty-of-care model for Aotearoa New Zealand's waste legislation, supported by appropriate offences and penalties?

Yes, if it works in the UK, it should work in Aotearoa New Zealand.

Question 21. Do you support strengthening obligations around litter by creating an individual 'duty of care' to dispose of waste appropriately?

Yes.

Question 22. What else could we do so that litter is taken more seriously as a form of pollution?

Run TV ads and bus shelter ads to this effect.

8. Obligations and Regulations

(a) CTA strongly supports introducing duty-of-care obligations as the foundation of a new regulatory regime for waste.

Question 23. Do you support a nationwide licensing regime for the waste sector?

Yes. We think it is important that all operators in the waste management system be licensed so that there is monitoring of their practices, and for the other reasons set out on page 53.

Question 25. What aspects of the proposals for regulating the waste sector could be extended to apply to hazardous waste?

We support the regulatory tools listed on page 56 to cover hazardous waste and other parts of the waste sector.

9. Product Stewardship Schemes

(a) In CTA's view, if internationally, product stewardship schemes are important tools for transitioning to a circular economy and the model for how they work is already in place, Aotearoa New Zealand should adopt them too, and we are in favour of improving legislative support for these schemes.

(b) We support improving the accreditation process for both voluntary and mandatory schemes, especially towards broader circular economy goals, for the reasons stated on page 58.

(c) Plastic products need to be more expensive than their counterparts packaged in alternative materials, such as glass or cardboard. For example, mineral water in a plastic bottle should be more expensive than the same mineral water in a glass bottle.

Questions 26. Should the new legislation keep an option for accreditation of voluntary product stewardship schemes?

Yes. As there are already 12 voluntary accreditation schemes in place in Aotearoa New Zealand, this would seem to be a useful part of the system.

Question 28. How else could we improve the regulatory framework for product stewardship?

As mentioned in the strategy, we can learn from overseas experiences.

(d) CTA strongly supports nationally consistent labelling of products for recycling, so that consumers know whether and how an item can be recycled.

(e) We are in favour of deposit return schemes, which have been used before in Aotearoa New Zealand, and which keep containers in circulation, embed the idea that packaging need not and should not be single use, and enables community groups to do some fundraising.

(f) We support central government creating national standards on matters relating to waste, recycling and resource recovery, as long as this does not waste resources already in use.

(g) CTA supports requiring a proportion of recycled content in specified products to encourage the development of a market for recycled material and requiring local authorities and waste collectors to provide recycling services for specified materials.

(h) We support using the law to make manufacturers and retailers confront the financial and environmental cost of disposal and encourage them to minimise packaging, increase reuse and recycled content, ensure recyclability and taking large amounts of packaging back when a customer returns it, with the aim of reusing the packaging.

(i) We support the Imports and Exports (Restrictions) Act 1988 being linked more closely to the other WMA powers and expanded to other goods that create problems for waste minimisation and management, in order to ban those that cause waste/emissions problems. Likewise, we should not be exporting products that cause problems for other countries.

Question 31. Would you like to see a right to return packaging to the relevant business?

Yes, along with some commitment to such a scheme by the business concerned.

10. Reuse and Repair

(a) As noted on page 13 of the Waste Strategy, consumption and replacement of short-lived products is currently normalised over reuse and repair. We support the shift toward a circular economy and education to this end.

(b) Aotearoa New Zealand could follow the European Union in implementing rules requiring manufacturers to make spare parts available and improve design of major appliances, and the accompanying implemented eco-design requirements, as well as the French legislation setting requirements for labelling product durability.

(c) CTA supports expanding the legal requirements for the right to repair through new waste legislation, including requiring manufacturers of certain products to provide manuals, provide spare parts within a certain amount of time, and label products for repairability and durability.

(d) We support a regulation-making power providing the ability to define the length of time a particular product should remain fault free and the reasonable period for repair, and that such a repair should be possible in terms of the availability and replaceability of substantive component parts.

(e) We support requiring retailers and manufacturers to attempt practicable repair of a product before a replacement is made.

Question 32. Would you like to see more legal requirements to support products lasting longer and being able to be repaired?

Yes. Having mobile phones made so that their batteries can be replaced is an example of such a need.

Question 33. Is there a need to strengthen or make better use of import and export controls to support waste minimisation and circular economy goals? For example, should we look at ways to prohibit exports of materials like low-value plastics?

Yes. We should not export our waste. We should take responsibility for our own waste. As per page 18, we need to find viable onshore solutions for our waste. These may, in future, where practicable, include the conversion of waste into some reusable energy source.

Question 39. How should waste levy revenue be allocated between territorial authorities?

It makes sense to take into account visitor populations as well as resident populations.

11. Learning from Other Countries

(a) We encourage our government to learn from the countries that already have strategies, policies and legislation to support this transition, such as those mentioned in the Waste Strategy, for example, the Environmental Protection Act 1990 and associated regulations in the UK that are referred to on page 51, and the Australian Government's biennial National Waste Report and annually updated National Waste Database (page 63).

In closing, Civic Trust Auckland has made a number of submissions on matters of waste management and we appreciate the opportunity to comment on the government's Waste Strategy. We look forward with hopeful optimism to seeing some changes to the way Aotearoa New Zealand deals with the important matter of our country's waste.

Date of submission: 10 December, 2021



Signature:

A handwritten signature in black ink, which appears to read "Audrey van Ryn". The signature is written in a cursive, flowing style.

Audrey van Ryn
Secretary, Civic Trust Auckland