

Response ID ANON-JAU1-3TTJ-P

Submitted to Detailed submission - Transforming recycling

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Your details

1 What is your name?

Name:

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2 What is your email address?

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3 Which region are you in?

Select your region:

Canterbury | Waitaha

4 What is your local council?

Select your local council:

Christchurch City Council

5 What type of area do you live in?

An urban area – a town with more than 1,000 people

6 Are you submitting as an individual or on behalf of an organisation?

Organisation

7 If on behalf of an organisation, what is its name?

Name of organisation:

Sustained Fun Limited (EcoSplat)

8 If on behalf of an organisation, what type is it?

Business

Other: please specify here:

Consent to release your submission

1 Do you consent to your submission being published on this website?

Yes

2 If yes to the above, clearly state if there are parts of your submission that you do not want published.

If yes to the above, clearly state if there are parts of your submission that you do not want published.:

Introduction

Read information from the Introduction - HTML format

Part 1: Container Return Scheme (NZ CRS)

Read information from Part 1: Kaupapa Whakahoki Ipu | Container Return Scheme (NZ CRS) - HTML format

Read information from Proposals for a NZ CRS - HTML format

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

Yes

Additional comments (optional):

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

Yes

Additional comments (optional):

Technical specifications should be included in the definition to eliminate confusion or writing off details by companies/manufacturers.

Single use coffee cups should eventually be considered for end of life plans. These are a significant issue - both in contributing to single use mentality and littering. Overseas, organisations are increasingly recommending that, where disposable takeaway cups aren't banned, they should be included in deposit return schemes.

[Read more information from Part 1: Kaupapa Whakahoki Ipu | Container Return Scheme \(NZ CRS\) - HTML format](#)

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

Yes

Additional comments (optional):

Yes. Twenty cents is the minimum refund amount the Government should consider.

Overseas evidence shows that setting the deposit too low can lead to disappointing return rates. Furthermore, once set low, it can become difficult to lift, even when schemes underperform. For example, in Australia, where schemes have a low 10c refund amount, recovery rates are not as high as they could be - the best performing scheme (South Australia) is still only at around 76% returns. For New Zealand, setting a rate any lower than 20c would likely require a deposit level increase in the short term to achieve the 85% minimum return rate.

We suggest building a periodic review for the deposit refund amount into the scheme, e.g. once every 5 years. If return rates are low or falling, the deposit amount should automatically be lifted.

4 How would you like to receive your refunds for containers? Please answer all that are relevant and select your preference.

Q4: How would you like to receive your refunds for containers? - Cash:

Strongly preferred

Q4: How would you like to receive your refunds for containers? - Electronic funds transfer (eg, through a scheme account or mobile phone app):

Strongly preferred

Q4: How would you like to receive your refunds for containers? - Vouchers (for cash or equivalent value product purchase):

Preferred

Q4: How would you like to receive your refunds for containers? - Donations to local community organisations/charities:

Preferred

Q4: How would you like to receive your refunds for containers? - Access to all options:

Strongly preferred

Q4: How would you like to receive your refunds for containers? - Other:

Other: please specify here:

It should always be possible to receive a deposit in cash and electronic funds transfer. So long as this option is always available, the other options (eg vouchers or donating to charity) are also suitable, but shouldn't be required of all return points.

[Read more information from Part 1: Kaupapa Whakahoki Ipu | Container Return Scheme \(NZ CRS\) - HTML format](#)

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

Yes

Additional comments (optional):

Yes, we strongly support variable scheme fees based on how much it costs to collect, transport, and reuse or recycle a package. It is fair that producers who choose packaging that is more costly to collect, transport and process should pay more to cover that extra cost.

We also support eco-modulation of fees to reflect the environmental impacts of different packaging types and thus incentivise use of more reusable and more recyclable packaging. In relation to recycling, we support the distinction between closed-loop/container-to-container recycling (more desirable) and downcycling (less desirable), being reflected in the scheme fees. Eco-modulation should also be sensitive to design features that hinder recyclability, such as colouring in PET bottles. Ensuring products and materials that are downcycled attract higher scheme fees will incentivise producers to shift to packaging that is more circular.

We strongly support the CRS building in financial incentives to drive an increase in reusable packaging. We would like more information as to why these cannot be designed to incentivise reusable packaging from the outset (i.e. why it is necessary to wait for "the future"). We support the inclusion of a standalone, per container single-use packaging levy from the outset, to accelerate the transition to reusable packaging.

[Read more information from Part 1: Kaupapa Whakahoki Ipu | Container Return Scheme \(NZ CRS\) - HTML format](#)

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

Yes

Additional comments (optional):

Yes, we support a comprehensive beverage container return scheme that includes all materials and beverage types. This means that if any beverage is sold in New Zealand, then the container it is sold in should be included within the scheme.

A comprehensive scheme with no exemptions reduces complexity, increases overall cost-effectiveness and efficiency, and avoids the risk of free riders (i.e. producers shifting to excluded materials/containers to avoid regulation/scheme costs).

The consultation document also sets out the Government's reasoning for proposing to include glass, which we also agree with.

We feel that it is still important to incentivize companies to swap to easy to recycle materials from less desirable (tetrapacs etc).

We support excluding compostable plastic containers, pouches or other novel/niche materials if their exclusion means they could not be put on the market. We believe some of these should be banned outright due to their misleading and unhelpful claims (ie PLA bottles).

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.

Additional comments (optional):

[Read more information from Part 1: Kaupapa Whakahoki Ipu | Container Return Scheme \(NZ CRS\) - HTML format](#)

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

Yes

Additional comments (optional):

Yes. We support the idea that excluded packaging types cannot be put on the market, but leaving the door open for flexibility in the case of a novel material or packaging type that can prove itself in terms of circularity. In most cases this will operate as a de facto ban on excluded materials.

At the very least, we note that all eligible materials and packages must be recyclable and designed for recycling. Alternative container types should also comply with the technical specifications for eligible containers that we mention in Q2.

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

No

Additional comments (optional):

No, we strongly disagree with this proposal.

Beverage container return schemes work best when they are simple and comprehensive, without exemptions. The proposed fresh milk exemption will weaken the scheme by making it less simple for consumers, creating unfairness and inefficiency, and reducing its efficacy. Exempting milk also misses the opportunity to level the playing field between single-use and reusable bottles in the one part of the beverage industry where reusables are seeking to gain a stronger foothold.

Single use milk containers represent a high priority for consumers we have spoken to.

Exempting milk creates an unfair system: Exemptions poke holes in the scheme's integrity and make it unfair and inefficient. Allowing milk to sit outside the scheme will give the dairy industry a free ride that no other beverage producer gets. Producers (and consumers) of alternatives to fresh cow's milk, such as plant or goat's milk, would be specifically disadvantaged.

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It is simpler and more efficient to include all beverage containers in the same scheme. Exempting milk bottles will result in national return rates of milk bottles remaining low. Regardless of current household return rates, the hospitality industry and other workplaces are major users of milk and often lack the recycling services that households have. Many businesses and organisations currently do not recycle milk bottles. Voluntary or alternative measures (whatever they may be) are unlikely to be any more effective than the status quo (which is why a CRS is being proposed for other beverages).

Including fresh milk containers in the CRS would shift the cost from ratepayers and councils to producers and consumers. If milk is exempt, even if recovery rates for milk are high or lift, the costs of collecting, handling and processing these bottles will continue to be paid for by ratepayers, rather than producers and consumers. A CRS is a product stewardship scheme - the goal of product stewardship is to shift costs away from the wider community and onto the people who make, sell and buy a product.

Exempting milk removes one important stepping stone to refillables: In relation to milk packaging, the consultation document says that "Refillable glass containers are also making a come-back, which is positive given refillable containers typically have a much lower carbon footprint than single-use containers as long as they are refilled many times." (42). However, the Government's proposal to exempt milk actually works against those milk providers that have already made (or plan to make) the switch to refillable packaging. This is because a CRS for single-use packaging (even if reusables are not included) goes some way to levelling the playing field between single-use and reuse by internalising the costs of collecting and recycling single-use bottles. By exempting milk from the scheme, the Government is missing the opportunity to level the playing field and support existing and future milk producers who are considering reusable packaging.

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

No

Additional comments (optional):

We do not support the exemption of milk from the CRS. This creates an unfair and inefficient system. Attempting to paper over this by investigating other means of recovering commercial milk bottles simply wastes time and creates duplication. Consumers deserve a simple, straight forward and easy to use system.

However, one option to reduce commercial milk bottle wastage would be to require hospitality outlets to switch to reusable milk packaging or kegged milk (as some are already doing). This could be achieved by setting a reusable milk packaging target of 70% for hospitality outlets by 2025. Servicing the demand created by such a target would facilitate the growth of refillable beverage packaging across the economy more generally.

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

No

Additional comments (optional):

No. We do not support this approach, the 183 million single-use fresh milk containers should simply be included in the CRS, which is already a product stewardship scheme. It makes no sense to silo one lone beverage product into another product stewardship scheme, separate to all other beverages. This will create unnecessary complexity, inefficiency, and subsequently increased costs.

The simplest, most cost effective approach, for consumers, producers, retailers and hospitality, is to treat milk containers like every other beverage container, enabling them to go through the same shared infrastructure, and be supported by the same shared managing agency, logistics, return points, collection system & services, to be funded through the same financial mechanisms.

Apart from increasing complexity and cost, including milk bottles in another product stewardship scheme also sets a precedent to pursue for producers of other beverages/container materials that do not want to be included in the CRS (or whose alternative beverage container material is currently proposed for exclusion on the grounds of it being difficult to collect and/or process). This runs the risk of proliferating the number of schemes that apply to beverages, creating more unnecessary confusion and inefficiency.

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

Additional comments (optional):

Rather than a blanket exemption of reusable packaging from the CRS, we urge the Government to consider an opt-in provision that allows producers offering reusable bottles to choose to be a part of the CRS in order to access the returns network. Any reusable operator opting in to the CRS would be required to pay the deposit and scheme fees just like any other producer.

Access to the scheme could make the world of difference for emergent players who would otherwise have to establish their whole returns and logistics network on their own. Most would struggle to compete with the convenience of the CRS network and may never be able to gain a foothold from which to scale. The purpose of allowing reusable operators to be a part of the CRS would be about enabling them to scale and service a wider segment of the market, rather than remaining niche.

Whether reusables are included or not, a clear regulatory, policy and investment plan is still needed to ensure that the market share for refillables will grow (see the measures listed for Q13 and 14). Exempting reusables from the scheme should not mean that the scheme is not designed to achieve the outcome of increasing reusable packaging.

Furthermore, whether reusables are included or not, greater clarity is needed about how the Government will determine whether a particular beverage is in reusable packaging or not. As it currently stands, whichever decision is taken (e.g. exempt refillables or include them) could detrimentally affect the reuse operations of at least some companies.

For example, many beverage companies do take their packaging back for reuse and operate washing infrastructure. However, they do not operate collection or deposit systems due to the complexity and cost of doing so as a vertically integrated company. Instead, they rely on customers to voluntarily return the packaging for reuse. As a result, they likely have low return rates that could mean in practice that most of their bottles are only filled once (through no fault of their own, due to lack of supporting infrastructure).

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

Yes

Additional comments (optional):

Yes, we strongly support binding targets for reusable beverage packaging being included in the CRS legislation from the outset.

Reusable beverage packaging targets must be designed carefully in order to achieve the goal of increasing the market share for reusables. A single global refillable beverage target, even if ambitious, is not sufficient to create accountability. Targets must apply to all beverage companies individually (potentially at different rates for different beverage categories), and there should also be targets for retailers and hospitality to stock a certain percentage of beverages in reusables.

Reusable targets for retailers and producers could be signalled in the legislation from the outset, but come into force after the implementation date of the scheme for single-use containers. For example, in 2028. This gives the industry and retailers time to adapt, and also creates greater certainty to drive investment towards new washing infrastructure, reverse logistics and reusable fleets.

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?

Please explain your answer here:

An 'eco levy' on single-use containers and virgin material.

Binding refillables quotas or targets.

Managing Agency required to invest in washing facilities for bottles, and collect reusables through the CRS returns network.

Central and local government investment in reuse assets and infrastructure

Scheme logistics and infrastructure that preempt a future increase in refillables and thus ensure interoperability for both single-use and reusable containers.

Tax incentives or pilots for innovative reuse models.

Supporting development of standardised reusable bottles to reduce costs and logistical complexity.

Public engagement and communications around reuse.

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

No

Additional comments (optional):

[Read more information from Part 1: Kaupapa Whakahoki Ipu | Container Return Scheme \(NZ CRS\) - HTML format](#)

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

Yes

Additional comments (optional):

We also support subjecting the 1% of containers above 3L to some level of regulation, including data reporting.

[Read more information from Part 1: Kaupapa Whakahoki Ipu | Container Return Scheme \(NZ CRS\) - HTML format](#)

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?

Yes

Additional comments (optional):

Yes we believe the CRS would provide a useful vehicle for collection of lids. Many consumers already find it frustrating when there are lids-off systems for recycling as they still feel responsible for proper disposal with no satisfying options currently (other than local, small scale recyclers as is the case here in Christchurch).

Including lids would keep lids out of the environment, they are often an easy to recycle plastic so should also be seen as a resource, and they may keep container systems cleaner by capturing the contents before getting to the sorting facility.

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?

Yes

If yes, how should they be collected?:

Yes, lids should be collected alongside containers to ensure the waste created by companies and manufacturers is all included as their responsibility. Consumers will want lids to be collected separately if they are collected on containers.

[Read more information from Part 1: Kaupapa Whakahoki Ipu | Container Return Scheme \(NZ CRS\) - HTML format](#)

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

Additional comments (optional):

We support a hybrid returns network that combines retail-based collection points return-to-retail with a thriving network of resource recovery centre/zero waste hubs drop-offs.

We think the ratio of retail return points to depots is unbalanced. Leaving space for just 50 depots nationwide is unambitious and would be a major missed opportunity given that CRS depots could become the backbone of a thriving resource recovery network for a wider range of products and materials.

There is an existing network of resource recovery sites/

Zero Waste hubs across the country, with infrastructure, systems, staffing and community support. They are well-placed and ready to become CRS depots.

We do support a level of mandatory return to retail, but note that while the retail network will be ensured in legislation, the provisions around supporting depots are too weak. We would like to see proposals for how the depot network will be similarly guaranteed within the system.

For example, the procurement model for depots appears to be purely market-based and left to the scheme managing agency, with little indication of how community players and smaller enterprises might be supported to succeed in the tender process. We would like to see legislated social procurement requirements for depots, so that the managing agency must consider tenders through the lens of social, environmental and community outcomes, as well as the extent to which the depot's existence already supports the Government's wider goal of building resource recovery network (CRS provides a reliable resource stream to keep wider operations afloat).

20 Where would you find it easiest to return eligible beverage containers? Please answer all that are relevant and select your preference.

Q20: Where would you find it easiest to return eligible beverage containers? - Commercial recycling facility:

Preferred

Q20: Where would you find it easiest to return eligible beverage containers? - Waste transfer station:

Preferred

Q20: Where would you find it easiest to return eligible beverage containers? - Other community centres/hubs:

Strongly preferred

Q20: Where would you find it easiest to return eligible beverage containers? - Local retail outlet that sells beverages:

Strongly preferred

Q20: Where would you find it easiest to return eligible beverage containers? - Supermarket:

Strongly preferred

Q20: Where would you find it easiest to return eligible beverage containers? - Community recycling/resource recovery centre:

Strongly preferred

Q20: Where would you find it easiest to return eligible beverage containers? - Shopping centre/mall:

Strongly preferred

Q20: Where would you find it easiest to return eligible beverage containers? - Other:

Other: please specify here:

[Read more information from Part 1: Kaupapa Whakahoki Ipu | Container Return Scheme \(NZ CRS\) - HTML format](#)

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?

Yes

Over 100m² (many smaller dairies likely exempt)

Additional comments (optional):

We feel that some retailers may realistically not have capacity to take on a drop off.

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?

Yes

Over 100m² (many smaller dairies likely exempt)

Additional comments (optional):

Potentially, rather than setting differing floor thresholds for mandatory return-to-retail between rural and urban areas, the Government could consider an exemption to mandatory return-to-retail in rural areas if a depot is within a certain distance of the retailer.

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

Yes

Additional comments (optional):

Yes, if there are depot sites close by or the potential to establish a depot within a given timeframe, this would be a good criteria for exemption.

[Read more information from Part 1: Kaupapa Whakahoki Ipu | Container Return Scheme \(NZ CRS\) - HTML format](#)

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

Yes

Additional comments (optional):

Yes, we strongly support the proposed 'deposit' financial model, for the reasons outlined in the consultation document, which we also completely agree with. A deposit model has consistently been the model advocated for by New Zealand proponents of a container return scheme,

[Read more information from Part 1: Kaupapa Whakahoki Ipu | Container Return Scheme \(NZ CRS\) - HTML format](#)

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

No

Additional comments (optional):

We do not support an industry-led scheme and we do not believe the regulated framework (e.g. deposit model and mandatory return-to-retail) is sufficient to justify an industry-led scheme. The goals of the managing agency will be broader than achieving high return rates, and these broader goals demand independence. For example, procuring the depot network and supporting a marked increase in refillables. We would like to see an independent managing agency, which could even be for-profit.

[Read more information from Part 1: Kaupapa Whakahoki Ipu | Container Return Scheme \(NZ CRS\) - HTML format](#)

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

Additional comments (optional):

Yes, we strongly support the targets and the phased approach.

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

Additional comments (optional):

Yes, there has to be a legislated consequence if targets aren't met or maintained. Increasing the deposit level and reviewing the structure of return points are both powerful measures.

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

Yes

Additional comments (optional):

We strongly support the implementation of a CRS for New Zealand.

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).

Not Answered

Please explain:

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

If you have any other comments, please write them here:

Part 2: Improvements to household kerbside recycling

[Read information from Part 2: Te whakapiki i te hangarua paeara ā-kāinga | Improvements to household kerbside recycling - HTML format](#)

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

Yes

Additional comments (optional):

We particularly support standardising collections around materials that have reliable markets and closed-loop applications in order to send a signal to the market about appropriate packaging types. It is not appropriate for Councils to collect materials for 'recycling' that have barely viable end-markets. We agree with the consultation document's statement that "As a country, we need to be realistic that only materials that can be recycled now and those that are in demand should be collected." (p.63).

We also support standardisation if it will lead to greater transparency around what happens to recycle. From conversations our members have with the general public, it is clear that people want to know 'where our recycling goes', but that this information is not easily accessible. The lack of transparency plays a real role in the loss of public confidence in the entire premise of recycling.

Standardisation should also apply to a wider range of issues beyond materials. There should also be standardisation of collection (e.g. source separation, collection frequency etc.), and sorting quality (e.g. MRFs, resource recovery centres/zero waste hubs) in order to maximise recycle quality and diversion from landfill. In line with the waste hierarchy, we would like recycling and food waste collected more frequently than mixed solid waste collections.

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

Additional comments (optional):

We would like more clarity about the extent to which the problem of public confusion relates to variance in council practice, versus the extent to which it relates to a lack of effective local communication and connection between waste and recycling collection services and the community.

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

No, regulation is required

Additional comments (optional):

Our understanding is that councils collect different recyclables because they set up their own off shore sales channels. If a CRS incentivises manufacturers and producers to use certain types of materials (ie those easily recyclable/high offshore value), this problem may become moot. We do not want to see standardisation mean that materials that would have been able to be recycled in one area no longer collected due to the limitations of regulation. But overall, if a national consistency could have been achieved through voluntary measures, it would have already. We believe regulation is needed as businesses and some councils are likely waiting to see what they are told.

Read information on Proposal 1: Collecting a standard set of materials - HTML format

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, 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)

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

Please explain your answer here:

From our understanding, pizza boxes will contaminate high value recycling material and should be excluded. Also, they often contain PFAS. We support regulations that phase-out use of PFAS in packaging before pizza boxes are accepted for kerbside and/or accepted for organics recycling to ensure PFAS isn't being introduced to recycled paper streams, waterways and soil.

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

Please explain your answer here:

Read more information on Proposal 1: Collecting a standard set of materials - HTML format

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

Yes

Additional comments (optional):

Many things in this area change rapidly, including manufacturer/producer materials and supply chains for recycling. They system needs to have a viable feedback loop to ensure it remains useful and relevant.

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

Additional comments (optional):

We believe that a product stewardship scheme that fully internalises the costs is important to ensure a) materials that are recyclable are being incentives for producers and b) a standardised recycling system doesn't just become a glorified solution with wish cycling taking place.

39 Who should decide how new materials are added to the list?

Ministry for the Environment staff in consultation with a reference stakeholder group

Additional comments (optional):

Whoever it is will need to have good representation of organisations who actually operate kerbside collections and sort and process material. Material and packaging producers have a vested interest in their material/product being collected at kerbside and should not be in the position of deciding whether the materials are collected (although they can make applications). This could mean that the WAB is not the right choice because appointees represent different interests that are not necessarily appropriate for this particular decision-making process.

Whichever model is adopted, the appointment process for reference groups and independent boards needs to be transparent and the names of the people in the group should be published.

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

Additional comments (optional):

Yes, although the financial mechanisms need to be in place to make it economically viable for sites in this network to be able to provide these extra services, i.e. they need to be paid for by regulated product stewardship schemes. Govt needs to avoid the risk of creating a public expectation that sites such as transfer stations and depots will fill in the gaps of the kerbside system, if there is no obvious mechanism to make this financially viable.

Furthermore, more support and investment needs to be given to transitioning all packaging items, including these packaging items that are harder to recycle at kerbside (or harder to recycle at all), towards reusable systems. The easy and convenient drop-off network should be supported with financing and investment to offer 'preparation for reuse' services for this packaging, such as washing and repairing.

Read information on Proposal 2: All urban populations should have kerbside food scraps collection - HTML format

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

Yes

Additional comments (optional):

Yes. The practice of sending organic waste to landfill is completely unsustainable and we have to stop doing this ASAP. Organics in landfill represent not only a source of methane, but a loss of valuable nutrients and resources, and inefficiencies in systems of production and consumption. However, the goal of diverting from landfill is a low bar and this language doesn't reflect circular thinking. Organics need to be framed through a whole system lens that accounts for soil, food, biomass and ecosystems (rather than a waste lens) to articulate their real value, and reflect their fundamental contribution in the circular economy.

The goal is not just about getting food and garden waste out of landfills. Policy and practices aimed at capturing food and garden waste must follow the waste hierarchy and put equal weight on:

- a) preventing and reducing avoidable waste at source
- b) considering what should happen to unavoidable organic materials with clear plans for putting this resource to highest and best use.

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

Yes

Additional comments (optional):

Many people don't have access or ability to set up a home composting system. Christchurch is a good example of green waste collections being successfully used.

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

Yes

Additional comments (optional):

Yes - from our discussions with Christchurch central city residents, their inability to access the same urban collections as other suburbs has been a huge disadvantage. While setting up systems for these places is difficult (due to apartment complexes etc), the residents should have the same access. It may be that apartment wide systems be embedded in the infrastructure.

[Read more information on Proposal 2: All urban populations should have kerbside food scraps collection - HTML format](#)

44 Do you think councils should play a role in increasing the diversion of household garden waste from landfills?

Yes

Offering a subsidised user-pays green-waste bin?, Making it more affordable for people to drop-off green waste at transfer stations?

Other: please specify here:

Collections should be optional, but can be subsidised. Councils should focus on providing convenient drop-off locations at a network of resource recovery centres. Promoting low waste gardens is not a useful angle for this as we should be promoting native vs non-natives for local fauna

[Read more information on Proposal 2: All urban populations should have kerbside food scraps collection - HTML format](#)

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

Yes

Additional comments (optional):

Yes. A phased approach means that there is time to develop appropriate infrastructure for each area/community. There is a balance between urgency and the need to get it right. Too short a timeframe may result in perverse outcomes or investment in technology that locks us into a suboptimal system.

However, the phased approach should involve a wider and more detailed set of triggers, and should not rely on a large processing facility as the determinant of timeframe.

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

47 Do you agree that councils without existing infrastructure should have until 2030 to deliver food scraps collections?

No, it should be sooner

48 Are there any facilities, in addition to those listed below, that have current capacity and resource consent to take household food scraps?

Please explain your answer here:

The list that is provided here overlooks a number of smaller operators who are currently taking household food scraps and are consented to do so. As such, the list sends the message that only large processing facilities are viable or worth considering.

We urge the government to consider multiple systems and a decentralised network approach. This can operate in tandem with larger operators. There is enough organic waste in New Zealand for everyone, but all need to be acknowledged, recognised and supported to create a diverse system that reflects nature.

Community-scale operators are critical for resilience, connection to the communities they serve, and produce quality outputs with ecological benefits (soil restoration and carbon sequestration) - they aren't a nice to have, but a critical component of a climate-ready functional system.

Many of the smaller operators who exist already, and who have capacity and consent to take household food scraps, are also in the process of upscaling, and are also supporting others to establish. These projects are ripe for investment and provide a buffer rather than putting all the eggs in one large facility/organisation.

[Read more information on Proposal 2: All urban populations should have kerbside food scraps collection - HTML format](#)

49 Are there any additional materials that should be excluded from kerbside food and garden bins?

Please explain which ones and why:

We strongly support excluding compostable packaging from kerbside food and garden bins. We also support and greatly appreciate the Ministry's position statement on compostable packaging, which we believe sends a strong and important signal and respects the perspective of processors and soil health.

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.

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.

Please explain your answer here:

We encourage government to develop its position statement on compostable products into policies that strictly regulate/restrict the types and uses of compostables on the market. With the release of the position statement (the content of which we support), there is now a disconnect between the Ministry's stance on the appropriateness of compostables, and the range of products currently on the market.

Read more information from Part 2: Te whakapiki i te hangarua paeara ā-kāinga | Improvements to household kerbside recycling - HTML format

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

Yes

Additional comments (optional):

Like any system, an assessment of if it is doing what is expected is important to ensure considered use of resources.

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

Additional comments (optional):

The more data there is, the better a plan can be informed and adapted. Feedback loops are crucial in maintaining an appropriate system approach.

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

Yes

Additional comments (optional):

Transparency around our waste has been very limited to date and consumers are more and more interested in this. We believe that publicly available information would allow more useful insight from community groups and citizens.

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

Yes

Additional comments (optional):

Details should also be provided about where diverted materials have gone and the uses to which they have been put. This transparency is fundamental to public confidence in recycling systems and in ensuring accountability that will in turn lift performance outcomes.

Read information on Proposal 4: Setting targets/ performance standards for councils - HTML format

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

Yes

Additional comments (optional):

Yes, but we would like to see a wider range of performance standards beyond diversion rates. We would like to see performance standards that lift the bar on collected resource quality. For example

- ambitiously low contamination rates

- evidence of resources being put to highest and best use

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

No

Additional comments (optional):

We feel this is too low a minimum but we know that councils already struggle with contamination. A standardised system may mean this would be easier to be ambitious with.

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

No

Additional comments (optional):

This is still a wide time frame when we are looking at such significant climate change challenges in the near future.

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

Yes

Additional comments (optional):

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

Yes

Additional comments (optional):

It is better to aim for high diversion rates to aspire to.

61 What should the consequences be for territorial authorities that do not meet minimum performance standards? For example withholding levy payments or paying a fine.

Please explain your answer here:

Withholding levy payments seems the most obvious for this. But we feel that the REASONS for not meeting the minimum need to be assessed and a feedback loop be in play to provide authorities opportunities to implement different strategies if needed

Read information on Proposal 5: Separate collection of glass and paper/cardboard - HTML format

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

Additional comments (optional):

Glass has been shown to have much high recycle rates when collected separately and we would like to see this the standard.

63 If glass or paper/cardboard is to be collected separately, should implementation:

Begin immediately

Additional comments (optional):

Read information on Proposal 6: All urban populations should have access to kerbside dry recycling - HTML format

64 Should all councils offer household kerbside recycling services?

Yes

Additional comments (optional):

65 Should these services be offered at a minimum to all population centres of more than 1000 people?

Yes

Additional comments (optional):

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

Yes

Additional comments (optional):

[Read more information from Part 2: Te whakapiki i te hangarua paeara ā-kāinga | Improvements to household kerbside recycling - HTML format](#)

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

Please explain your answer here:

Most of what is collected at kerbside is single-use packaging. New business models, regulatory levers, strategic expenditure of the WMF and PIF, and behaviour change and information campaigns to enable the public to access unpackaged/reusable packaging options. The CRS is a great opportunity to educate people about reusables and the issues with single use.

[Read more information from Part 2: Te whakapiki i te hangarua paeara ā-kāinga | Improvements to household kerbside recycling - HTML format](#)

Part 3: Separation of business food waste

[Read information from Part 3: Te whakawehe i ngā para kai ā-pakihi | Separation of business food waste - HTML format](#)

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

Yes

Additional comments (optional):

Yes. We thank and support the government for proposing this important and well overdue action.

Many businesses we have spoken to have mentioned that they want to make sustainable changes but are essentially waiting to be told what to do by the government. This is an easy way for them to take steps towards reducing their carbon, acknowledging their impact and making further changes and offsetting.

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

Yes

Additional comments (optional):

There is so much waste from companies that does not seem to even be currently quantified. these timeframes could be set earlier with a more creative approach to developing processing infrastructure. More attention could be given to support existing and emergent processors to set-up and scale alongside businesses being required to separate food waste. By supporting the growth of processors, the lead in time for business food waste separation could be reduced. Diversity of processors (size and type) is also appropriate given the diversity of businesses.

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

Yes

Additional comments (optional):

Potentially. An additional and related important question is how to support areas with less access to suitable processing facilities to develop such facilities, and consider the relevance of a diversity of processors (type and scale) to service the growing need of businesses (of all different shapes, sizes and locations).

The framing of what constitutes 'suitable processing facilities' in this consultation is blunt and problematic. It largely assumes only large scale facilities are suitable. It assumes that processing cannot be done at multiple scales and via multiple methods. The focus should be on the diversity of processing systems to ensure highest and best use of organics (quality outputs - differing composts etc) that addresses community and commercial needs, rather than a blunt measure of diversion from landfill.

Govt also needs to rule out the possibility that a narrow diversion measure will see investment in problematic systems like MBRT systems that reduce landfill emissions, but create highly contaminated outputs

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

Yes

Additional comments (optional):

72 Should any businesses be exempt?

No

If so, which ones? Please explain your answer here:

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

Please explain your answer here:

This needs much more attention - education around the issues with food waste, easy access to resources, speakers from council to visit workplaces etc. Reducing waste is better than finding a way to dispose of. Many people are not aware of the issues around this.

Provide further feedback

Any general feedback on the consultation

Add your comments, ideas, and feedback here:

Upload supporting documentation

Upload documentation:

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