

MAKING A POSITIVE IMPACT ON AOTEAROA NEW ZEALAND IN THE WASTE, RESOURCE RECOVERY AND CONTAMINATED LAND SECTORS

BRIEFING PAPER FOR THE INCOMING
GOVERNMENT AND MINISTER FOR
THE ENVIRONMENT

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About WasteMINZ

WasteMINZ, formed in 1989, is the largest representative body of the waste, resource recovery and contaminated land sectors in Aotearoa New Zealand. Our aim is to make a positive impact on Aotearoa New Zealand by:

shaping relevant legislation and policy so we can reduce the amount of waste and the impact of it on our environment

advocating to central government on improvements to policy needed in the waste, resource recovery and contaminated land sectors

providing learning and development opportunities and creating best practice guidance for our sectors to help our members do the best they can for the environment and communities of Aotearoa New Zealand.

WasteMINZ's strength is in the diversity of the membership, the different perspectives each member brings, and the voice that we give to all our members. WasteMINZ has more than 300 member organisations, including:

government agencies such as the Ministry for the Environment, the Environmental Protection Authority, and the Department of Corrections

major waste and resource recovery facility operators, including composters

consultants who provide services to private sector businesses

local and regional councils

contaminated land management specialists

supermarkets and food rescue organisations

behaviour change specialists

community groups with a focus on waste and resource recovery

We provide eight different sector groups that focus on the key issues in the waste, resource recovery, and contaminated land management sectors.

Each of these groups work towards reducing the impact of waste on the environment by providing best practice guidance, thought leadership and resources on some of Aotearoa New Zealand's pressing waste, resource recovery and contaminated land issues – such as the circular economy, right to repair, lead contamination in residential properties, kerbside collections, a container return scheme and food waste.

Our aim is to ensure an evidence-based approach to addressing these challenges which allows Aotearoa New Zealand to thrive.

Key waste, resource recovery and contaminated land management issues in New Zealand

Waste, resource recovery and contaminated land management in New Zealand is complex and key issues include:

A legacy of focusing on disposal to land and recycling, rather than addressing the overproduction and overconsumption of goods that become waste.

The lack of a nationwide infrastructure network to process and recover a wide variety of products and materials onshore.

A lack of incentives for manufacturers to create products or materials that last or can be repaired easily.

A low and differential waste disposal levy, which does not act as a deterrent to dispose of material at landfills that could be re-purposed, re-used or not produced in the first place.

An increase in extreme weather events, which produce huge amounts of materials that typically end up in landfills.

An increase in greenwashing claims by packaging companies, in relation to the end point for their products, leading to consumer confusion.

A lack of effective management and solutions for the increasing amount of hazardous waste.

A lack of reliable, national data on material flows and waste which makes it difficult to measure the extent of the issue and the progress which has been made.

A lack of regulated product stewardship schemes. These schemes put the onus on producers and sellers to pay for the lifecycle of a product, whereas the current system puts the onus of disposal on householders.

An excessive volume of soil sent to landfill – over 40% of all waste.

A disjointed environmental regulatory system for waste and contaminated land split across MfE, the EPA, regional councils and local authorities.

Te rautaki para | Waste strategy

The release of Te rautaki para | Waste strategy, gave WasteMINZ members a direction to strive towards; confidence that waste was being treated as a matter of national significance, and that our services and the associated infrastructure are classified as essential. Our priorities are framed around the eight goals as set out by the strategy.

Goal 1

Systems: strategic planning, regulatory, investment and engagement systems are in place and operating to drive and support change

Actions we have taken

In 2015 WasteMINZ produced the National Waste Data Framework, which provided a voluntary method for territorial authorities to gather waste data. In 2022, WasteMINZ, in collaboration with the Ministry for the Environment, updated the framework to accommodate new mandatory data reporting requirements.

We have worked with the Ministry for the Environment (MfE) and the Climate Change Commission to provide expert advice and submissions on consultations such as the emissions reduction plan and the action and investment plan.

With funding from MfE, WasteMINZ ran the 3-year Rethinking Rubbish and Recycling campaign, which provided data on the amount of recyclable and non-recyclable packaging in people's homes, uncovered the distinct profiles that lead to pro-recycling behaviours, and ran a campaign to educate people on the importance of rinsing recycling.

Actions we would like to see government take

Progress the current Ministry for the Environment waste work programme with a focus on delivery of the Te rautaki para | Waste strategy and provide clear guidance about the future of waste management: The strategy, together with the action and investment plan, must provide direction for industry to achieve the required systems change. Guidance provides confidence for those in the sector to invest in waste and resource recovery research and infrastructure.

Ensure a close linkage between MBIE's Circular and Bioeconomy Strategy and MfE's Waste Strategy Action and Investment Plan (AIP): Ensuring both strategies are connected and take a long-term view will set the stage well for sustainable organics management as well as any future AIPs. These plans must be heavily influenced by circular systems that support waste reduction by prioritising activities at the top of the waste hierarchy.

Move to a systems approach for resources and products so that a circular economy is established and maintained, and materials and products recovered from the waste stream have a sustainable use in keeping with the principles of a circular economy.

Develop an expression of Te Tiriti o Waitangi for the waste industry, which incorporates Mātauranga Māori: All decisions underpinning our transition to a zero-waste, net zero carbon society must be made through a Te Tiriti o Waitangi-based partnership to ensure a just transition.

Ensure revision of the Waste Minimisation Act is undertaken to ensure that we are not encumbered with out-of-date regulation and policy.

Goal 2

Infrastructure: A comprehensive national network of facilities supports the collection and circular management of products and materials

Action we have taken

WasteMINZ provides education and resources for our members and the public to help them understand what networks and infrastructure are available for the management of waste and resources. This includes a map of facilities which collect used batteries, a map of commercial composting facilities in New Zealand, and a list of landfills which take asbestos contaminated waste.

Actions we would like to see government take

Improve and prioritise policy settings that progress a circular economy in a practical way the community can embrace: To progress the delivery of Te rautaki para | Waste strategy 2023, a clear focus needs to be placed on prioritising infrastructure such as reverse logistics, regional washing facilities and repair facilities to support changing embedded wasteful behaviours in the community.

Recognise the important role that waste and resource recovery infrastructure plays in our societies: Waste should be included when defining infrastructure in key acts, national policy statements and regulations, including nationally and regionally significant infrastructure. This enables local government, and the private sector to carry out the necessary planning and development activities for long term management of waste and resources which are necessary to maintain resilient communities.

Goal 3

Responsibility and accountability: We are taking responsibility for how we produce, manage and dispose of things, and are accountable for our actions and their consequences

Actions we have taken

We produced guidelines covering a range of topics including helping companies avoid making greenwashing claims about packaging and products, ensuring best practice is followed when it comes to disposal to land, and improving health and safety practices in the sector.

WasteMINZ's Behaviour Change Sector Group released a position paper on large mixed waste municipal waste to energy facilities, which asked for a moratorium on waste to energy plants that take municipal waste, because these facilities require a fixed amount of waste of all types. This encourages wasteful behaviour and is entirely contrary to a circular economy.

Establishing a Textiles Advisory Group with textile and resource recovery stakeholders to enable New Zealand to tackle textile waste.

Actions we would like to see government take

Declare textiles as a priority product so that work can begin on a regulated product stewardship scheme for textiles.

The majority of our members support the introduction of a container return scheme (CRS) as soon as possible alongside other product policies like product stewardship. A CRS is seen as a way of shifting the cost of disposal from ratepayers to producers, manufacturers, and consumers, and significantly reducing the volume of containers that end up in our waterways and marine environment.

Goal 4

Using less for longer: We are using fewer products and materials, and using them for longer, by making them more durable, and repairing, reusing, sharing and repurposing them

Actions we have taken

In 2019, the WasteMINZ Product Stewardship Sector Group established a Right to Repair working group. Since the working group was established, Right to Repair has become widely advocated for and is now included in the Te rautaki para | Waste strategy.

We work closely with and support Repair Café Aotearoa New Zealand and have spoken to a submission on Repair Café's petition - *Make it our right to repair* - at parliament's Environment Committee.

Actions we would like to see government take

Ensure legislation is amended to enable repair and reuse of goods to be easier and cheaper.¹

Introduce more well-designed regulated product stewardship schemes at a faster rate to make diversion and recovery a shared responsibility with all stakeholders, and more regulation of producers and products in general to stem the creation of items that will in a short time become waste. This would include improving the processes for co-designing regulated product stewardship schemes to ensure schemes target the top of the waste hierarchy to reuse and repair.

Place a greater focus and emphasis on product re-design alongside investment in reuse infrastructure and logistics to reduce the creation of products that become waste.

Implement a New Zealand version of the EU's Eco-design for Sustainable Products Regulation to ensure products put on the New Zealand market are required to be durable, repairable and contain no harmful products.

Introduce economic incentives and regulatory measures that reward the production of durable and repairable products such as a raw materials tax, measurable timebound targets to reduce consumption and increase reuse, subsidising activities such as repair and mandatory green and social public procurement to challenge the current business model and reward businesses for producing durable, repairable products.²

Implement a soil strategy for New Zealand that recognises that soil is a finite resource and the exceedance of a background concentration does not make the soil dangerous or unusable.

1 Right to Repair submission

2 Squaring the Circle

Goal 5

Resource recovery systems: Resource recovery systems are operating effectively for core materials and across all regions

Actions we have taken

In 2019 WasteMINZ initiated work on the standardisation of kerbside recycling materials with our members. In 2020, on behalf of the Ministry for the Environment, WasteMINZ produced recommendations for standardising kerbside collections. These recommendations have formed the basis of the requirement for all councils to collect a core set of materials at kerbside recycling collections in all settlements with 1000 people or more from February 2024.

Our Territorial Authorities' Officers Forum, which represents waste management officers in local councils, is currently planning a piece of research to develop a decision-making framework and guide for kerbside organics collection. This will help each council decide what's best for their residents – food waste collection only; collecting garden waste as well; and what exactly can be included in those collections.

Actions we would like to see government take

Increase the waste disposal levy above \$60 per tonne and continue increasing it over the next five years: The increase will provide essential funding for critical resource recovery infrastructure to enable the circular economy through more efficient collection and management of materials, as well as encouraging waste producers to rethink the management of their waste.

Our Territorial Authorities' Officers Forum would like 50% of the waste levy funds to continue to be allocated to local councils: Councils are key to the delivery of the waste strategy, require support for action in their local communities and have responsibilities that will remain largely unchanged under the proposed new Act. If funding is reduced this will impact on TAs' ability to deliver on waste management and minimisation goals and targets.

Continue to endorse and update the Action and Investment Plan which provides the sector clear signals in relation to the direction for resource recovery systems throughout Aotearoa New Zealand.

Goal 6

Recovering value: We look for ways to recover any remaining value from residual waste, sustainably and without increasing emissions, before final disposal

Action we have taken

The WasteMINZ Behaviour Change Sector Group has released a position paper outlining its position on municipal waste-to-energy facilities, including recommendations for the government.

Action we would like to see government take

Commission a report from an independent entity on large-scale municipal waste-to-energy plants to determine their relevance in Aotearoa New Zealand, including how they might relate to the waste strategy and the Ministry of Business, Innovation & Employment's yet-to-be-developed Circular and Bioeconomy Strategy. In this instance, we are referring to large scale waste-to-energy facilities that propose an alternative way of managing household waste including plastics. It does not include smaller scale facilities that power an industrial site using a specific waste material instead of fossil fuel or technologies such as anaerobic digestion that use a non-thermal process to turn organic waste into a gas for energy or production of soil conditioners.

Goal 7

Emissions: Emissions from waste are reducing in line with our domestic and international commitments

Action we have taken

Since 2018, WasteMINZ has been running Love Food Hate Waste New Zealand, a behaviour change campaign which provides tips and tools to help households reduce and prevent food waste. In July 2023, the government provided almost \$2.9 million to WasteMINZ to run multi-media campaigns over the next three years.

Actions we would like to see government take

Drive best practice behaviour change programmes and initiatives that focus on activities at the top of the waste hierarchy: It is important to provide the systems to shape the behaviour we want from our communities. A focus should be placed on problematic and growing waste streams such as soil, food waste and textile waste, which are an accessible way for the community to engage with climate change issues, similar to Wrap UK's textile campaign.

Ensuring that guidance on greenhouse gas emissions and targets for emissions reductions for the waste sector accurately reflect current emissions, and the full life cycle emissions for different waste management and resource recovery options: Guidance is crucial to help central government and local councils make good decisions about future management of waste and resources which support our transition to net zero carbon.

Accelerate the development of end markets and uses for high quality organic products: Without enough development of end markets and uses, lowest-cost processing of organic material could take over, and low-quality organic products could swamp the market. These could greatly impact soil health. There also needs to be a strong focus on reducing and mitigating contamination in organic waste.

Support food rescue activities: Food rescue is a valuable activity that reduces the unnecessary creation of organic waste by ensuring that food is used for its intended purpose - feeding people. A report commissioned by the Aotearoa Food Rescue Alliance (AFRA) notes that food rescue generates a Social Return on Investment of 4.5:1 (\$4.50 worth of social value is generated for every dollar invested). This figure includes waste minimisation and the avoidance of methane emissions from food waste in landfill. The Organic Materials Sector Group encourages political parties to demonstrate support for food rescue through financial commitments and engagement by government agencies.

Recognise emissions from transport of waste properly: Many wastes travel 100 km or more to reach their disposal or treatment facility. This is not explicitly recognised as part of the sector's liability, which is counterproductive as the reason for moving waste is often to avoid emissions.

Goal 8

Contaminated land: Contaminated land is being remediated and managed to reduce waste and emissions, and enhance the environment

Actions we have taken

WasteMINZ is working on three sets of technical guidelines to ensure best practice and consistency across the country, when it comes to handling the disposal of low-level asbestos- contaminated soils, dealing with historical coal tar contamination in roading materials and soil sampling for disposal characterisation.

A joint working group comprising of WasteMINZ members and members from the New Zealand Geotechnical Society is currently working on a joint practice note identifying the drivers of soil movement, the environmental problems caused by soil movement, financial costs of soil disposal, and alternatives to soil disposal.

The formation of a multi-sector residential lead working group, concerned with the undetermined magnitude of health effects from multiple residential (non-occupational) sources of lead. Their purpose is to bring together people to identify and address gaps in knowledge and practice for the benefit of all New Zealanders

Actions we would like to see government take

Address Crown-owned contaminated land.

Many hundreds of Crown-owned sites are known contaminated land which need to be prioritised for management or remediation

Provide an appropriate framework for contaminated groundwater in addition to soil:

The National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health (NESCS) only addresses contaminated soil when and if it is developed. Previous governments intended to add a second NES for investigating and managing those contaminated sites that affect water quality, food quality, ecosystems, or produce ground gases, but didn't commence this work.

Adjust policy settings and regulatory processes to enable a circular economy for soils and prevent soils from ending up in the landfill.

Currently almost all of the soils produced at (urban) development sites end up as waste in Class 1 landfills. This is driven by industry practices, planning failures, and consenting processes. We need standards and guidance that recognise soils are useful and drive diversion and reuse.

Make a single government agency overall accountable for childhood lead exposure.

Working together for a better environment

The waste, resource recovery and contaminated land sectors are made up of passionate, committed people with years of expertise. Our advice is highly valued by those in the sectors, and in particular, the people who develop policy and legislation in and for the industry.

The work we do ensures that our sectors are consistently working towards best practice and contributing to better environmental outcomes for Aotearoa New Zealand.

There are still many issues and concerns in the waste, resource recovery and contaminated land sectors – we can and must do better. We need a government that prioritises waste and resource recovery as an essential service, continues to progress the Te rautaki para | Waste strategy, and understands the importance of protecting and enhancing our environment.

**The future is in our hands - Kei ō
tātou ringaringa te anamata.**



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