

**Ministry for the
Environment**

Transforming Recycling

8 May 2022

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Submitter details

1. Nelson Marlborough Health (Nelson Marlborough District Health Board) (NMH) is a key organisation involved in the health and wellbeing of the people within Te Tau Ihu. NMH appreciates the opportunity to comment from a public health perspective on the Ministry for the Environment's *Taking Responsibility of Our Waste*
2. NMH makes this submission in recognition of its responsibilities to improve, promote and protect the health of people and communities under the New Zealand Public Health and Disability Act 2000 and the Health Act 1956.
3. This submission sets out particular matters of interest and concern to NMH.
4. This submission has been compile in conjunction with twelve other DHBs including: The submission has been compiled and reviewed by representatives from the following 13 DHBs: Bay of Plenty, Auckland, Counties Manukau, Waikato, Mid Central, Capital and Coast, Hawkes Bay, Northland, Taranaki, Canterbury, Waitemata, Hutt Valley.

Part 1: Container Return Scheme

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

Yes.

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

Yes. It should be noted that this definition refers to a vessel or casing of a beverage regardless of whether it is sold alone or as a unit in a multipack. We do not have concerns about the definition but consideration may need to be given to cost ramifications on products. If the proposed refund of 20 cents is placed on each vessel of a six pack of a sugar sweetened beverage that would increase the overall price by \$1.20 whereas only 20 cents would be added to a similar 3 litre product. This may result in more people purchasing sugar-sweetened beverages in larger containers, leading to further consumption of the drinks because they don't have the same shelf life as single smaller units which can have negative health impacts.

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

Yes, as 20 cents would create a relatively strong incentive to return containers for a refund which would result in a higher return rate (potentially 85%) which will also reduce beverage container litter. This approach aligns well with other similar overseas schemes. This scheme could also generate profits for charities, sports clubs, schools to organise litter clean-ups.

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

- Cash
- electronic funds transfer (e.g., through a scheme account or mobile phone app)
- vouchers (for cash or equivalent value product purchase)
- donations to local community organisations/charities
- access to all options
- other (please specify)

Access to all options. We support access to all options provided the refund system is simple to use.

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

Yes, we agree with the adoption of eco-modulation within the fee scheme. Eco-modulation results in producers of harder to recycle packaging such as liquid paperboard and glass having a slightly higher scheme fee than producers using aluminium cans given that aluminium cans are a valuable commodity, highly recyclable, reduce emissions when recycled and have good circular potential. This approach encouraging more producer responsibility, and in addition could lead to greater innovations for packaging options.

6. Do you agree with the proposed scope of beverage container material types to be included in the New Zealand Container Return Scheme (NZ CRS)?

Yes. We do note that liquid paperboard has been involved for the NZ CRS but has not been included in kerbside recycling. This could create confusion. The kerbside recycling should align with the NZ CRS. If there is a rationale for two different systems, this needs to be clearly articulated.

7. If you do not agree with the proposed broad scope (refer to Question 6), please select all container material types that you think should be included in the scheme.

- Glass
- plastic (PET 1, HDPE 2, PP 5, and recyclable bio-based HDPE and PET)
- metal (e.g., aluminium, steel, tinplate and bi-metals)
- liquid paperboard

We agree with all options but please note comments in Q6.

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

It is expected that the proposals outlined here will need to be reviewed as time progresses. A timeline could be included for the NZ CRS where new forms of packaging can be assessed on a set time frame (e.g. 2 years). This should be a regular review rather than on a case by case basis because the internal processes of handling different materials may need to be altered across the country which could be time consuming. Therefore, a regular review period is recommended.

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

No. We note and understand the concern that a refundable deposit could have unwarranted financial impacts on households. For that reason, we propose a different approach:

- a) that fresh milk and alternative milk containers are included in the NZ CRS but the containers themselves are exempt from price increases. This way people do not have the additional burden of price increases but they can utilise the refund system and receive a reward for recycling their fresh milk and milk alternative containers. This also creates a larger price differential between the price of milk and the price of sugar sweetened beverages.

The consultation document sets out the rationale that 86% of plastic fresh milk containers consumed at home were captured in kerbside recycling collections. There is a danger in using this rationale because there are many other items that are also captured in kerbside recycling, and the manufacturers of which may wish to use the same argument for exemption.

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

No, refer to question 9 answer.

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, refer to question 9 answer.

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?

Yes. Including beverage containers that are intended for refilling would become a disincentive to bottle returns and a penalty on producers who have already made the switch to refillables. Furthermore, inclusion of refillables in NZ CRS creates a double handling – currently return is from consumer back to producer whereas this would create consumer return to NZ CRS, who in turn would return to producer.

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

Yes. We support the development of a 'refillable target' alongside the development of the NZ CRS. A refillable target will encourage opportunities for businesses, retailers, and producers to consider how to redesign their packaging to be reusable and also develop processes for consumers to refill their beverage containers or other container as opposed to buying a new product off the shelf.

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?

In order to support the development of refillable beverage containers and a refillable market, the government needs to work with key manufacturers and businesses to develop capacity and provide advice, support, and education in the benefits of transitioning towards producing refillable products.¹ Funding with upfront costs to transition business models also needs to be considered, particularly for smaller businesses that may not be able to manage the upfront costs but be otherwise willing.²

Educating consumers and providing clear communication around the benefits of refilling products as opposed to buying a new product off the shelf will also be needed. There is already some familiarity with refillable products and processes in Aotearoa New Zealand, primarily through bulk bins and refillable stations that are in some supermarkets and specialty stores. Consumers should be further encouraged to support the refillable market through price incentives and reduced cost of products.

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

No

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

No. Whilst the majority of containers are under 3 litres, there should be the option for recycling larger water containers at manual transfer stations. Ten litre water bottles are commonly available at supermarkets and are popular for picnics and camping. Recycling options should be available for these larger containers.

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, as this would ensure that more lids are returned which reduces rubbish and this also limits odour. Clear and concise messaging is essential to ensure that people understand expectations.

18. Do you agree that the scheme should provide alternative means to capture and recycle beverage container lids that cannot be put back on containers? If so, how should they be collected?

Yes.

¹ Patwa, N., Sivarajah, U., Seetharaman, A., Sarkar, S., Maiti, K., & Hingorani, K. (2021). Towards a circular economy: An emerging economies context. *Journal of business research*, 122, 725-735.

² Coelho, P. M., Corona, B., ten Klooster, R., & Worrell, E. (2020). Sustainability of reusable packaging—Current situation and trends. *Resources, Conservation & Recycling*: X, 6, 100037.

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. To ensure the proposal is successful, easy access to container return/refund points is essential.

20. Where would you find it easiest to return eligible beverage containers? Please select all that are relevant and rank these from most preferred to least preferred.

- **Commercial recycling facility (eg, depot, more likely to be located in industrial zone)**
- **Waste transfer station**
- **Other community centres/hubs (eg, town hall, sports club, etc)**
- **Local retail outlet that sells beverages (eg, dairy, convenience store, bottle shop, petrol station)**
- **Supermarket**
- **Community recycling/resource recovery centre**
- **Shopping centre/mall**
- **Other (please specify)**

We support the use of all types of facilities and our proposed rankings are written below. It is important to note that this is a real opportunity to use the NZ CRS to make a positive difference in communities not just in terms of waste minimisation but employment opportunity and funding streams for communities. So we would like to see an emphasis on promoting the use of NZ CR sites for marae, community groups and not-for-profit organisations to adopt and benefit from the scheme. Consideration should also be given for communities to set up their own Donation only reverse vending machines. The benefit of this approach is primarily driven to maximise consumer convenience for those consumers who may wish to simply return containers with the appropriate refund to be allocated to a specific charity(ies) as supported by the facility (e.g., a Reverse Vending Machine placed at a zoo with refunds to support zoo wildlife initiatives). This has been done in Taronga Zoo in New South Wales. This approach could be used across New Zealand for instance at bus exchanges, zoos, educational facilities, council buildings, sports stadiums and marae.

Please find preference in the following ranking:

1: Supermarket

2: Equal: Shopping centre/mall - within the carpark & local retail outlet that sells beverages (e.g., dairy, convenience store, bottle shop, petrol station)

3: Other community centres/hubs (eg, town hall, sports club, etc)

4: Equal: Community recycling/resource recovery centre / Commercial recycling facility (eg, depot, more likely to be located in industrial zone) / Waste transfer station

21. Retailers that sell beverages are proposed to be regulated as part of the network (mandatory return-to-retail requirements). Should a minimum store size threshold apply?

And if yes, what size of retailer (shop floor) should be subject to mandatory return-to retail requirements?

- **Over 100m² (many smaller dairies likely exempt)**
- **Over 200m² (many dairies and some petrol stations likely exempt)**
- **Over 300m² (many retailers, dairies, petrol stations and smaller supermarkets likely exempt)**

We do not agree with the approach taken in respect to Container Return Facilities. The approach given doesn't allow for density of providers.

22. Do you think the shop-floor-size requirements for retailers required to take back beverage containers (mandatory return-to-retail) should differ between rural and urban locations?

If yes, what lower size threshold should be applied to rural retailers for them to be required to take back containers?

- **Over 60m² (as in Lithuania)**
- **Over 100m² (many smaller dairies likely exempt)**
- **Over 200m² (many dairies and some petrol stations likely exempt)**
- **Over 300m² (many retailers, dairies, petrol stations and smaller supermarkets likely exempt)**

Yes – also could be in relation to distance to nearest supermarket

Consideration could also be given to adopting a home delivery service like Norway and Germany. Under this arrangement, consumers buy Infinitum (i.e., Norwegian scheme operator) bags from their online retailer which are barcoded and embedded with a code to track the bag and its contents. It was reported that this means all retailers are treated fairly and people who do not have the time, or capacity due to health issues, to visit a shop can still return their containers for a refund³

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.)

Consideration could be given to having a minimum number of providers in a particular area, where retailers can only apply for exemptions should that minimum number not be reached. Consideration should also be given to Norway experience where the return to retail model covers 15,000 shops, kiosk and petrol stations to see how they manage their small sites in relation to health and safety/food safety reasons.

³

[https://www.marlborough.govt.nz/repository/libraries/id:1w1mps0ir17q9sgxanf9/hierarchy/Documents/Services/Recycling%20and%20Resource%20Recovery/Container%20Return%20Scheme%20-%20Design%20Progress%20to%20Date/Design%20Document%20and%20Appendices/NZ Container Return Scheme CRS Final Design 27 October 2020.PDF](https://www.marlborough.govt.nz/repository/libraries/id:1w1mps0ir17q9sgxanf9/hierarchy/Documents/Services/Recycling%20and%20Resource%20Recovery/Container%20Return%20Scheme%20-%20Design%20Progress%20to%20Date/Design%20Document%20and%20Appendices/NZ%20Container%20Return%20Scheme%20CRS%20Final%20Design%2027%20October%202020.PDF) pg 154

California has adopted a convenience zone model where each zone must have a collection and deposit refund centre. If the zone does not have a deposit refund centre, all retailers that sell beverages in the zone are required to collect containers and refund deposits. If they do not, they are required to pay a daily fee to the governance agency.⁴

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

Yes.

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

Yes. We once again encourage the Ministry to explore the opportunities in enabling marae, community groups and not-for-profit organisations to site collection centres, charity reverse vending machines so they can benefit from the scheme. This has been successful overseas:

- a) For example, in Queensland: Western Downs Outreach Project (WDOP), a not-for-profit organisation that supports the homeless community, opened a container return depot when the scheme started. The depot was very successful and WDOP extended their operating hours from 5-days to 7-days a week. WDOP also expanded their operation to service mobile sites in multiple towns. By 30 June 2019, WDOP had collected 3.8million containers and returned AUD\$380,000 to communities. WDOP was also able to support the community by creating community jobs through the scheme.⁵
- b) In California, a not-for-profit organisation called "Sure We Can" was founded in 2007. The organisation opened a licenced container return facility specifically for the homeless community. The objective of Sure We Can was to let recycling be a dignified way of life for the homeless. In 2011, Sure We Can stated that they had opened five locations since 2008. The centres include bathrooms, communal socialising and relaxation spaces, and collection and deposit refund areas that are designed to be effortless, safe and have no negative perceptions associated with the process. In 2013, it was stated that Sure We Can received 500,000 containers a month.

We would also encourage the adoption of "deposits shelves" in collection areas. In Denmark, some people were spending long hours looking for litter and putting themselves in unsafe situations going through rubbish bins that contained contaminated wastes and sharps. Deposit shelves were introduced in Denmark to provide the community with a safer method of collection, where people who did not want to redeem refunds could leave their containers to others to redeem.⁶

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.

⁴ Ibid, pg 214.

⁵ Ibid. pg 217

⁶ Ibid pg 215

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, the scheme should be regularly reviewed.

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

Yes. New Zealand produces a large quantity of waste (17.5 million tonnes annually) and unfortunately landfilling is the norm (12.6 million tonnes or 72% of total wastes) with rates of waste going to landfill continuing to increase. We support the proposal that plans to reduce waste by introducing a container Return Scheme, along with improving household kerbside recycling and separating business food waste as this aligns with the vision of the recently proposed National Waste Strategy: "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."

Currently New Zealand has limited recycling programmes and reuses materials in a low value chain such as glass bottles, plastics and paper as well as limited green waste services that are turned into compost. The services are not consistent throughout the country. The new proposals seek to remedy this.

If the scheme also includes the introduction of community led collection points along with charitable reverse vending machines, then there will also be additional funding flowing into communities.

The introduction of a scheme may help to change people's behaviour beyond just the recycling of plastic containers. In a world where environmental awareness is steadily increasing, people may be more willing to participate in environmentally friendly initiatives; however, limited attention spans and the information overload of everyday life mean that many people are also more likely to follow their old habits. Reverse vending machines near a store can serve as a prompt for consumers to reconsider their habits more broadly. The benefit of a prompt is not so much in educating people, as in giving a reminder at the right time. The simpler the prompt, the more effective it is. A network of reverse vending machines near stores could therefore serve as a prompt to people to change their consumption of plastic over time.

To the extent that people dislike spending time on understanding how a scheme works, and which items can and cannot be recycled, the more complex the scheme, the lower the level of expected engagement.

We recommend MfE establish register for producers and distributors to report items that fall within the CRS. This will build greater understanding of the volumes circulated within NZ and drive innovative solutions.

29. If you do not support or are undecided about a CRS, would you support implementation of a scheme if any of the key scheme design criteria were different? (eg, the deposit amount, scope of containers, network design, governance model, scheme financial model, etc). Please explain.

N/A

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

There are packaging items that do not fall within CRS or kerbside collection, therefore there needs to be a packaging register established for producers and distributors to report all packaging volumes subject to the CRS, kerbside collection or non-recyclable. Understanding all packaging items placed on the market will move businesses towards circular principles.

Part 2: Improvements to Household Kerbside Recycling

Proposal 1: Collecting a Standard Set of Materials

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

Yes, we agree with the collection of a standard set of materials. Across the country, there has been a wide difference between the types of materials collected and this has resulted in many householders being confused. A standard set of the materials brings clarity. It will be easier for businesses to identify and move to packaging that is recyclable in kerbside collections and households and will have certainty about what can be accepted throughout the country. Businesses should also be encouraged to move towards the standard set of recyclable materials to minimise non-recyclable grades of plastic being landfilled.

Businesses should be encouraged to move towards the standard set of recyclable materials to minimise non-recyclable grades of plastic being landfilled.

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?

We agree that there should be a standard set that is advertised nationally with appropriate communication material (including stickers for bins, posters etc.). This would be a minimum standard to which all councils would have to meet, however councils may elect to collect additional items, but this must be supported by strong public education initiatives and labelling.

Confusion is inevitable in busy households, so packaging must contain clear labelling in a large print, e.g. nationally recyclable in NZ, only recyclable in '*name of district*', or alternatively 'not recyclable'.

However, there may be regions that excel at recycling and managing different materials (i.e. not stockpiling) at a small scale suitable for their district. There should be the expectation that these regions can contain and be required to communicate the standard rules along with their site-specific rules clearly and succinctly. The regulations should not restrict innovation and opportunity.

Responsibility should also be placed on suppliers to manufacture packaging which are collected by council kerbside recycling. Tighter regulations at central government level would guide a broader procurement and supply chain strategy to deliver a planned stewardship approach to end of life products and packaging.

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

Regulation is required. International examples such as Scotland and Ireland have shown that voluntary schemes have not been so successful therefore a regulatory approach is recommended. Voluntary agreements have also been ineffective in NZ for the most part (e.g. clean streams accord, packaging accord).

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.

- a) glass bottles and jars
- b) paper and cardboard
- c) pizza boxes
- d) steel and aluminium tins and cans
- e) plastic bottles 1 (PET) and 2 (HDPE)
- f) plastic containers and trays 1 (PET) and 2 (HDPE)
- g) plastic containers 5 (PP)

We agree that all items shown above should be included in a national list. This should be standardised across all food and non-food packaging as part of broader packaging regulations.

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

No comment

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

We note that liquid paperboard has been involved for the NZ CRS but has not been included in kerbside recycling. This could create confusion. The kerbside recycling should align with the NZ CRS. If there is a rationale for two different systems, this needs to be clearly articulated. In addition, the treatment of lids should be aligned with the NZ CRS. These would require adequate recycling facilities.

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

Yes, we agree with this approach. It is expected that innovation will lead to new products, markets and sorting technologies therefore a regular review process is required. This will also incentivise manufacturers to redesign their packaging to become accepted for recycling and therefore take advantage of market gains. Regulation may be required to ensure packaging that is not approved for kerbside recycling is not manufactured in the first place.

Soft Plastics: As soft plastics make a substantial proportion of a households waste, we strongly encourage the Ministry to continue to explore sustainable local options for soft plastic recycling as a matter of priority.

38. What should be considered when determining whether a class of materials should be accepted at kerbside in the future? (Tick all that apply)

- a) sustainable end markets
- b) end markets solutions are circular and minimise environmental harm
- c) viable processing technologies and locality
- d) processing by both automated and manual material recovery facilities
- e) no adverse effects on local authorities, including financial
- f) supply chains contribute appropriately to recovery and end-of-life solutions for their products
- g) other (please specify).

We agree that (a), (b), (c) and (d) should be included, however regards to option (c), we would like to see the rationale explained more in depth. Does this weigh the opportunity costs of small remote towns transporting waste vs placing waste into landfill?

We do not agree that option (e) or (f) should be included. Adverse effects on Councils should be explained in more detail, it is important that all Councils adopt the proposal and this may mean that central government support is needed initially. It is noted in the Regulatory Impact Statement (RIS) that the net impact on Councils would be positive as it reduces cost of recycling service in the longer term with higher quality and quantity of material recycled and not disposed to landfill as contamination.⁷

With regards to supply chains, there is a danger that this is used as an out-clause by companies. Further regulations may be needed to ensure that this doesn't occur. Furthermore, regulation could capture supply chain stewardship responsibilities. Council and government body should be informed prior to products entering the market including on-line ordering to assess the recyclable options. Commercial contracts should be legally binding with clauses for any service-product sold included to cover stewardship and appropriate end of life options (kerbside, or CRS). Furthermore, there should be risk mitigation strategies included in the planning solution to mitigate the impact of major disruptions impacting on recycling for example; during major floods, storms, power outages, pandemics etc.

⁷ <https://environment.govt.nz/assets/publications/Interim-regulatory-impact-statement-improving-household-and-business-recycling.pdf>

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

- a) the responsible Minister**
- b) Ministry for the Environment staff in consultation with a reference stakeholder group**
- c) existing Waste Advisory Board**
- d) an independent board**
- e) other (please specify).**

The responsible minister should hold authority to add to the list, supported by advice from the waste advisory board. Furthermore, the responsible minister and other ministers (MPI, MFAT, MBIE, NZT&E) should develop consistent principles and guidelines for packaging to address climate change that will deliver NZ's environmental objectives.

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, we agree with this. These sites need to be well advertised. In addition, Second Hand-Sunday concept could be rolled out nationally. Second-Hand Sunday⁸ is an opportunity to re-home household goods where homeowners can put unwanted material on their kerbside for others to collect (although this particular initiative may be unsuitable in city locations). This has worked very successfully across Nelson Marlborough and other territorial authorities. Establishing and encouraging local second-hand markets, unwanted items or market days will build closer community ties and participation.

For people who do not have cars or the ability to transport larger items, each district's resource recovery centre could have a second-hand page or forum, where different items are listed from around the community, with details of location and contact options and members of the public can arrange to pick up for free. This would also eliminate any emissions from the transport of the item from the origin to the resource recovery centre and simplify the process.

Proposal 2: All urban populations should have kerbside food scraps collection

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

Yes, we agree that food and garden waste should be diverted from landfills, aside from exemptions outlined in question 72. It has been estimated that New Zealanders throw away 157,389 tonnes of food per year.⁹ Food waste makes up to 40% of a household's waste. Diverting this waste will be beneficial in reducing greenhouse gas emissions (% of GHG). According to MfE, "globally an estimated one third of all the food we produce is lost or wasted between farm and fork each year. That's 1.3 billion tonnes of food that is never eaten". From an environmental point of view this suggests significant use of land, energy, water and people

⁸ [Second Hand Sunday - Nelson City Council](#)

⁹ <https://lovefoodhatewaste.co.nz/food-waste/what-we-waste/>

resources which in turn generate emissions all of which ends up in landfill. There is also the financial cost to households and businesses in discarding unwanted food. NZ needs to adopt a greater respect for food and improve our food management behaviours that will reduce food waste. Greater awareness and social marketing is needed to address the core problem which is to either minimise or eliminate food waste from occurring.

There is great variation in the collection of food and green waste across the country with only a minority of Councils providing collection services. When food is put into landfill it decomposes without oxygen and then releases greenhouse gases. Collected food waste can be used to make compost, becoming a resource for healthier soils. The national introduction of kerbside food scrap collections would help alleviate this considerably. Especially as many urban areas are intensifying, there may not be space for people to dispose of their own food waste therefore it is important that there is kerbside food scrap collection available.

The Food Rescue Organisation in Northland, currently funded from landfill levy revenue, redistributes quality surplus food from food retailers to community groups. We recommend that this model is replicated across the country so that more people have access to cheap healthy food, while also diverting large amounts of food waste from landfill.

Food waste culture and attitude needs to change across our society. By reducing the level of food waste, we recommend a broader National Strategy for Food Waste Reduction similar to that adopted by the German Government.¹⁰ The German legislation is aligned to the UN SDGs (12.3) to substantially reduce food waste and preserve valuable resources in the production of food (soil, water, energy fuel) and associated carbon emissions.

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, for the reasons listed above in question 41.

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 agree.

The RIS states that 85% of NZ's population live in urban areas of 1,000 people or more and that recent analysis by councils suggested a cut-off size of 1,000 is feasible with Waimate District Council adopting this approach.¹¹

Kerbside collection should go hand in hand with other options for smaller settlements for example; home composting/community gardening. It should not negatively affect existing decentralised or local composting initiatives and community gardens with training and raising awareness. Maintaining local food

¹⁰ [BMEL - Food waste - National Strategy for Food Waste Reduction](#) pg 39.

¹¹ [Regulatory Impact Statement Template \(environment.govt.nz\)](#)

waste initiatives is a more sustainable option as opposed to reliance on a centralised composting service where kerbside collection is not logistically feasible.

The geographic distance of smaller settlements will invariably incur greater costs in disposal. Councils will need to consider the best approaches for their district managing kerbside collections from smaller towns looking at the proximity of other towns, geographic constraints and benefits /costs of running smaller green waste facilities. For example; Takaka located in Nelson-Marlborough district is a small town of 1330 but it is geographically separated from Motueka (population 7950). There may be employment opportunities in Takaka if green waste facilities were built there but economic benefits in transferring waste to a larger site at Motueka. However, many people in rural areas will have the ability to manage their own food scrapes through composting, and animal feed to chicken and pigs.

44. Do you think councils should play a role in increasing the diversion of household garden waste from landfills? If so, what are the most effective ways for councils to divert garden waste?

- **Offering a subsidised user-pays green waste bin?**
- **Making it more affordable for people to drop-off green waste at transfer stations**
- **Promoting low-waste gardens (eg, promoting evergreen trees over deciduous)?**
- **Other (please specify)?**

Yes, we agree with the first two bullet points. In addition, we support the promotion of low-waste native gardens, as this supports local ecosystems, and the promotion of the Compost Collective's Sharewaste programme.¹² This programme connects people who wish to recycle their food scraps and other organics with their neighbours who are already composting, worm-farming or keeping animals.

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

Yes, we agree with a phased approach, including a year of completion. This will allow markets and infrastructure to develop.

46. Do you agree that councils with access to suitable existing infrastructure should have until 2025 to deliver food scraps collections?

- **yes, that's enough time**
- **no, that's not enough time**
- **no, it should be sooner.**

Yes, we agree that this would be an adequate amount of time to finalise the scheme, develop an effective programme with background research and strong public education before collection begins. If the scheme starts strong from the start, it will be more likely to be a success, and will require less time and effort making adaptations afterwards. People should be aware of the scheme developing through national advertising and have knowledge and understanding of exactly

¹² [ShareWaste NZ](#)

what items they should place in their bins before receiving their bin, rather than a rushed implementation where people get into bad habits from the start.

While a food collection scheme is subsidised by the Council this should be no additional cost to ratepayers. Timing will vary based on capacity. For example, Auckland Council announced a food scraps collection in 2019 but currently this only covers Papakura and selected streets in Takapuna, Northcote and Milford.

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

- **yes, that's enough time**
- **no, that's not enough time**
- **no, it should be sooner.**

No, it should be sooner. Councils will require time for adequate planning, consultation, consenting, building/development, public education etc. Rushing forward with a solution could be counterproductive where a better design could have been more successful therefore NMH recommends that there are requirements on councils to formulate the plan for collections to a sufficient level of detail to have a financial estimates commitment in long term plans by 2027

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

- **Envirofert – Tuakau**
- **Hampton Downs – Waikato**
- **Mynoke Vermicomposting site – Taupō**
- **Enviro NZ – new facility planned for the Bay of Plenty in 2023**
- **Living Earth – Christchurch**
- **Timaru Eco Compost Facility – Timaru.**

We propose to exclude the following non-food products and any packaging from any kerbside collection bins used to divert food scraps and/or green waste from landfills:

- kitchen paper towels / hand towels / serviettes (keep)
- newspaper and shredded paper (keep)
- food-soiled cardboard containers (eg, pizza boxes)
- cardboard and egg cartons
- compostable plastic products and packaging
- compostable fibre products and packaging
- compostable bin liners
- tea bags.

We agree with the rationale put forward regarding excluding the following materials.

- food-soiled cardboard containers (eg, pizza boxes)
- cardboard
- compostable bin liners
- tea bags.

However, we disagree that compostable packaging, paper towels, serviettes, egg cartons, newspaper and shredded paper has been excluded.

While recognising the issues that arise from accepting compostable packaging, it is disappointing that there is a blanket exclusion on all of these products. After food producers have been encouraged to switch from plastic to compostable packaging, there is still no feasible option to dispose of this waste anywhere apart from landfill. Therefore, the problem has not been dealt with, it has just been side-lined. It would be good to see the food waste issue also being dealt with as a waste management issue, rather than focussing predominantly on soil health. The contamination and confusion will be significant for members of the public who are provided a compostable container for their food and expected to dispose of their food waste in a bin which will be sent for composting. These items are greenwashed, as consumers are misled in their belief that they are making informed choices. There should be an urgent focus on standardising compostable packaging to enable these to be accepted for composting by the time this mandate is enforced. If an item does not meet this standard, it should not be allowed to call itself compostable and should be manufactured to be either recyclable (and clearly labelled) or banned from being manufactured and sold.

Paper-based products are helpful to make up the carbon/organic mix for good composting.

49. Are there any additional materials that should be excluded from kerbside food and garden bins? Please explain which ones and why.

No comment

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**

Yes, to all the above. There is a lot of confusion surrounding items listed as compostable. We would like to see the adoption of a National Standard of Compostable Packaging that can be used to certify products as compostable and therefore provide clarity for public, businesses and waste collectors. This should be implemented prior to initiating these mandates to allow for compostable packaging to be accepted (and therefore food waste within these containers to be captured, which helps divert food waste from landfill).

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.

We would like people to have the ability to include finer paper products such as newspapers and shredded paper, kitchen paper towels/hand towels/serviettes and egg cartons. These products breakdown easily into soil and contribute to the

carbon content which is essential in composting. However, these items would take up space and therefore would require larger bins.

Proposal 3: Reporting on household kerbside collections offered by the private sector

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

Yes, as this necessary to understand the current performance of collections and monitor the effectiveness of any changes. It also allows us to continually set higher standards and aim for improvements, rather than maintaining a minimum. Monitoring and reporting should be communicated for each region/TLA.

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, this provides Councils with a complete data-set of what proportion of waste is being collected in recycling and general waste. This helps form a picture of how well households are recycling and whether efforts to encourage people to reduce waste are effective. It also will help inform planning and help to maintain an agreed standard for private companies to meet in order to be effective and operational. MfE could establish a central repository for Councils and private waste providers to enter data for national reporting/statistics.

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

Yes. We agree with the RIS recommendation that regional summary statistics are published so that commercially sensitive information is protected.¹³ Published data provides households with confidence in the effectiveness of kerbside services for their areas.

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

Council data should also be collated so households can see how their region compares to other districts.

Proposal 4: Setting targets/ performance standards for councils

56. Should kerbside recycling services have to achieve a minimum performance standard (e.g., collect at least a specified percentage of recyclable materials in the household waste stream)?

Yes. There should be minimum performance standards that are accompanied by central government investment and technical support as well as mandatory reporting. Performance standards are a way of encouraging improvements to the overall system which will result in less material going to landfills reducing overall emissions.

¹³ [Regulatory Impact Statement Template \(environment.govt.nz\)](#) pg 47

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

We would like to see the minimum standard to be set higher at 60%. It should have a threshold below which it is no longer seen to be effective (cost of scheme, transport emissions etc. is not worth the quantity that is collected), however this situation would require further consideration and initiatives for how to increase performance, rather than stopping the service completely. Aiming for 60% minimum might take a while to reach, however this just means that the amount of education and resources put into increasing this target will continue until it is achieved.

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

Nationally, Councils are all at different stages of offering improved kerbside recycling. Therefore a two staged approach is recommended where those with the infrastructure in place have 3 years to meet the minimum standard of 60% and then 5 years to achieve 80%. For those Councils who do not have the infrastructure in place, we should be aiming to meet the minimum threshold in the first 3 years of an established collection (setting a specific year will disadvantage areas such as Wellington/Lower Hutt who do not have the capacity for commercial composting of all food waste and require development in this area before they can roll it out to public). For example, if an area without existing infrastructure has a collection set up by 2026, they will have until 2029 to meet the minimum threshold. Any authorities not meeting this level would then have to address the issues, which would then encourage improvement faster than waiting until 2030. Some areas may not have operational facilities until close to 2030, and these areas should still be afforded three years to reach the minimum standard.

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, New Zealand standards should match international best practice and be reviewed over time. This would allow authorities who are going above and beyond compliance to be highlighted and have their efforts celebrated.

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

We recommend that New Zealand aspires to 80%, as the high-performance target. Clarification is sought on whether the CRS will be included in this target.

61. What should the consequences be for territorial authorities that do not meet minimum performance standards?

Rather than a consequences approach, we recommend that further support is given to Councils that are underperforming with regards to building capacity and auditing tools. However, repeated and chronic poor performance may require financial penalties. This would need to be defined further. Territorial authorities

should be incentivised through financial grants to drive success, which should help deter poor performers.

Proposal 5: Separate collection of glass and paper/cardboard

62. Should either glass or paper/cardboard be collected separately at kerbside in order to improve the quality of these materials and increase the amount recycled?

- glass separate
- paper/cardboard separate
- separated, but councils choose which one to separate
- status quo – they remain comingled for some councils.

We support recycling glass separately, as glass is problematic for paper and cardboard recycling, resulting in additional processing costs and the production of a lower value commodity.

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

- begin immediately
- wait for any CRS scheme design to be finalised
- wait until the impact of a CRS scheme has been observed.

If the regions that have the means to do this then we recommend that implementation begins immediately. However, if systems are not already in place then those areas should wait for the CRS design scheme to be finalised.

Proposal 6: All urban populations should have access to kerbside dry recycling

64. Should all councils offer household kerbside recycling services?

Yes, as this is fundamentally important as part of creating a circular economy and promoting equality across the country and therefore should be available as widely as possible.

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

Yes, please refer to the answer given in Q43. In smaller towns, consideration needs to be given to recycling drop off points where locals can drop off a range of different recyclable materials. It is important that these sites are serviced and maintained on a regular basis so they do not create a nuisance.

Services should be provided depending on overall environmental impact. If providing the service to a town of just over 1000 (e.g. Bulls) has a high carbon footprint, this might not be viable. These areas should be incentivised to develop decentralised facilities and home composting, whereas towns with larger populations who are close to the centralised composting facility is worthwhile to have kerbside recycling.

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?

Disagree, given that Waste Management and Minimisation Plans are on a six-yearly cycle, under the current proposal this could mean that some Councils would not need to implement these collections for 8 years. We recommend that a 3 year time frame is used instead as this aligns with the Long-term planning cycle so that Councils have time to adequately budget for these changes.

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

There are many non-government organisations that work in this space. We recommend that the likes of the Trust for Sustainable Living ¹⁴, the network of environment centres and the Future Living Skills programme through the Sustainable Living Education Trust ¹⁵ are utilised.

Part 3: Separation of Business Food Waste

Proposal: Source separation of food waste is phased in for all businesses.

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

Yes as diverting food scraps from landfill is to reduce greenhouse gas emissions. Further to this, consideration should be given to including public facilities such as hospitals and prisons who are large producers of food waste. The public sector should be leading by example.

Clarification is required on whether it is the contracted food service provider who is required to separate food waste, i.e. Spotless, or if hospitals are required to separate out food waste in all areas (because they produce and serve food in specific areas). It could be a challenge to encourage staff to separate food waste in non-clinical areas, or staff rooms, if they do not have kerbside food waste collection. Business food waste separation should therefore correlate with the implementation of kerbside food waste collection. If the second option applies, food waste collection will be challenging in public areas (especially if omitting compostable packaging). Hospitals can train staff and there is still issues with compliance. We have no control over what the public does.

In order to understand and prevent food waste at the source in commercial kitchens, cafes etc., business owners should consider adopting in-kitchen tracking for both preparation and plate waste. Lean Path¹⁶ is such a tool dedicated to reducing food waste in the kitchen and from the plate.

¹⁴ [Home - Trust for Sustainable Living](#)

¹⁵ [Sustainable Living Education Trust](#)

¹⁶ [Lean Path for Food Waste](#)

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

Yes, we with this approach, however there should be exemptions as described in question 72, and businesses should be encouraged to avoid the food waste in the first place, as discussed in question 68.

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

Yes. The RIS states that "for example, businesses with access to existing food scraps collections could have until 2025 to separate food scraps, while businesses further away and where new facilities may have to be built could have until 2030". We agree with this approach.

For facilities with access to composting/anaerobic digestion facilities, these facilities should face few barriers to redirecting food waste. Phasing in these changes will allow infrastructure to build as demand increases and allow markets to develop for the food waste. As in question 68, food waste separation for businesses who do not produce or sell food, and businesses who contain a large number of areas/buildings which are not involved in food service (hospitals/schools/universities) should correlate with the implementation of kerbside food waste collection in each district. This will mean that staff within the business who do not directly work with food will be in the practice of separating food waste at home, and therefore will be more likely to separate food waste at work.

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

Yes. Redirecting food waste from businesses who produce food will make the biggest impact. Once other businesses see this happening on a large scale, this will provide the precedent for them to separate food waste. The issue with businesses who do not produce food waste (and likely do not collect all their food waste in a centralised way, i.e. in a kitchen), means that a large amount of training will be required to provide staff with the knowledge they need to separate food waste and avoid contamination. This will require time. Food rescue groups could also assist these businesses to reduce their waste

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

We recommend that New Zealand adopts the Scottish approach that businesses producing less than 5kg of food scraps a week are exempt. Exemptions will also be required for food waste which has entered an infectious patient's environment in a healthcare setting. Clarification is required for collection in hospital settings and other large office space sites (for example universities and schools) where there are many staff areas producing small amounts of waste. Small business with <5kg waste should be encouraged to join local community schemes (zoos, community and school gardens). Businesses should also be encouraged to adopt in-house composting solutions that don't impact on food and safety (e.g. Bokashi).

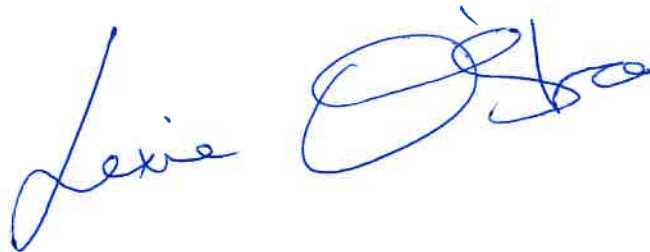
73. What support should be provided to help businesses reduce their food waste?

- Educational programmes and training provided by sustainability businesses and charities.
- Contact details for advisors who can help businesses through the process of change and help address barriers.
- Training videos and social messaging through MOB apps.

Conclusion

We thank the Ministry for the Environment for the opportunity to comment on Transforming Recycling.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Lexie O'Shea', with a stylized, cursive script.

Lexie O'Shea
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