

22 May 2022

Via Website

To whom it may concern,

FEEDBACK ON TRANSFORMING RECYCLING

Thank you for providing the Queenstown Lakes District Council (QLDC) with the opportunity to provide feedback in relation to the three proposals outlined in the Te panoni I te hangarua: Transforming Recycling consultation document.

QLDC supports system change to transform recycling and accelerate towards a circular economy. Widespread, systems focused change is much needed to safeguard the living systems that the planet and people depend on. For greater impact on emissions and waste, initiatives must target changes at the top of the waste hierarchy not just diversion from landfill. QLDC looks forward to further initiatives and actions in the new Waste Minimisation Strategy and revised Waste Minimisation Act that will support this.

QLDC has several points of clarification and recommendations to ensure the proposed changes meet the needs of local communities.

QLDC would like to thank the Ministry for the Environment for demonstrating commitment to a number of key issues also highlighted in QLDC's Waste Minimisation and Management Plan 2018. QLDC looks forward to working with the Ministry to make further progress on transforming recycling and moving towards a circular economy.

This submission outlines key points, recommendations, and specific responses to the consultation questions in Annex A.

QLDC does not need to be heard at any hearings that result from this consultation process.

Yours sincerely,



Mike Theelen
Chief Executive

FEEDBACK ON TRANSFORMING RECYCLING

1. CONTEXT

- 1.1 The Queenstown Lakes District is world-renowned for its clean mountain air, stunning landscapes, and crystal-clear water. These elements form a large part of why this is such a popular place to live and why the district experiences such high visitor numbers and population growth.
- 1.2 With such growth, the consumption of goods and services and construction at an all-time high, sustainable, and effective minimisation, and management of the waste this creates is essential. The Queenstown Lakes District community has demonstrated that waste minimisation needs to remain a significant priority as part of the district's response to climate change.
- 1.3 Officers have responded to the questions in the consultation document attached as Annex A. Key points are outlined here further to the advice in Annex A.

2. PART 1: CONTAINER RETURN SCHEME (NZ CRS).

- 2.1 QLDC fully supports the establishment of the NZ CRS to demonstrate leadership and action to towards a circular economy in a way that New Zealanders and visitors are already familiar. Commitment to an Extended Producer Responsibility approach and associated return schemes will help ensure that products are designed for a circular economy and will help establish a better understanding by purchasers of their impact on the environment.
- 2.2 QLDC supports a move that sees more of the communities' waste costs and responsibilities to the environment pushed back to the producers of goods and consumer products. Paying for the end of life of consumer products and their associated environmental harm should not be left to councils and their ratepayers alone.
- 2.3 QLDC strongly supports the inclusion of glass beverage containers in the NZ CRS as the current voluntary product stewardship scheme is problematic and very costly to councils and their rate payers.
- 2.4 Officers experience that clear, consistent, comprehensive, and simple messaging works most effectively to change behaviour. To support this, QLDC recommends that the NZ CRS include all beverage vessels and casings regardless of material type or container size to prevent confusion within local communities.
- 2.5 Container Return Schemes and refillable systems are complementary. In order to shift more rapidly up the waste hierarchy and meet emissions reduction targets, reusables should be included into CRS design and implementation from the get-go. This will require focus on the supporting infrastructure and systems to accommodate refillables as well as one-way/single-use containers.

3. PART 2: IMPROVEMENTS TO HOUSEHOLD KERBSIDE RECYCLING

- 3.1 QLDC fully supports an approach that will lead to greater consistency of services and infrastructure across the country. There will be some small, rural, or remote communities where it is not realistic to provide the same level of service as a more densely populated area. Alternative solutions should be explored and supported for these communities.

- 3.2 QLDC does not currently support the inclusion of coloured PET for recycling as there is no market for this product. QLDC need to maintain trust and confidence in local recycling systems so that the community are motivated to recycle, know how to recycle correctly, and do not lose faith in the system.
- 3.3 QLDC cannot presently support the inclusion of meat trays, biscuit trays, and punnets for recycling. New Zealand's recyclables re-processor does not accept these products from facilities without optical sorting. The re-processor has not confirmed if this position will change after PVC trays are banned. QLDC is planning a new recycling facility within the next 5-8 years and are looking to include improved technology to enable these products to be accepted.
- 3.4 QLDC does not support the inclusion of pizza boxes. Old Corrugated Cardboard (OCC) is a revenue generating, valuable product for QLDC and its contractors. Pizza boxes are an avoidable contamination in OCC, and QLDC should not compromise OCC quality by introducing a known source of contamination.
- 3.5 Successful introduction of organic collection services will require significant investment in infrastructure. Guidance on decision making within a hierarchy of organic waste management and a comprehensive framework for reduction of and beneficial reuse of organic wastes is much needed. QLDC has been working on an organics strategy but does not have funding earmarked for services or investment in the necessary infrastructure to implement a service. QLDC welcomes a facilitated, supported, regional approach to infrastructure.
- 3.6 To ensure that messaging is consistent and not confusing to the community, the materials collected via the NZ CRS should be the same as those collected kerbside. In addition, clear messaging is required on how materials are to be presented such as clean, no lids, triggers or pumps, and size requirements. In order to be successful, support for behaviour change messaging should be ambitious, and far-reaching.
- 3.7 Measurements of activity and impact across all levels of the waste hierarchy should be adopted and shared widely so that progress across the hierarchy can be monitored. Focusing on just recycling and landfill data will not encourage innovation or greater levels of activity at the top of the hierarchy.
- 3.8 QLDC does not support the proposed methodology for measuring performance. QLDC notes that diversion and contamination rates for each region may not be comparable. A consistent approach and verification process will need to be established before performance can be compared. For example, contamination of QLDC's kerbside material cannot be measured in isolation, as material from both municipal and commercial collections are combined at the MRF in-feed.

4. PART 3: SEPARATION OF BUSINESS FOOD WASTE

- 4.1 QLDC supports actions to divert food waste by businesses. Diversion of organic material from landfill to beneficial use should be a priority across all sectors.
- 4.2 NZ's infrastructure for dealing with domestic and commercial organic waste is lacking. Focus and investment in services and infrastructure is needed for both the household and business

sector. Investment must also focus on animal manure, forestry biomass, biosolids and timber.

ANNEX A: TRANSFORMING RECYCLING SUBMISSION

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

Yes. The definition needs to be clear to avoid confusion and include all drinkable products.

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

Yes. Containers sealed and watertight at point-of-sale will prevent confusion with take-away cups.

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

Yes. Regular review of the scheme and deposit value will be required to confirm if the amount needs to increase to achieve higher diversion and support development of alternatives to single-use such as refillables.

4. How would you like to receive your refunds for containers? Please answer all that are relevant and select your preference? – cash; electronic funds transfer (e.g., through a scheme account or mobile phone app); vouchers (for cash or equivalent value product purchase); donations to local community organisations/charities; access to all options; other (please specify)

QLDC support the inclusion of all options. Councils may need support in negotiating revenue sharing arrangements with their contractors for refunds applicable to kerbside collected material or public place bins.

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

Yes. Products that are more readily recyclable or reusable should be encouraged, and those that are harder to recycle should be dis-incentivised through higher scheme fees (if they cannot be banned, phased out or prevented from being manufactured altogether). QLDC support the introduction of eco-modulated fees that reflect the level of negative (or positive) impact that the product has on the environment.

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

No. The scope needs to include 'all beverage containers regardless of material type or container size'. This will ensure that producers cannot bypass the CRS system by producing a beverage container made of an alternative material or a different size. Inclusion of all beverage containers combined with variable scheme fees will incentivise use of containers that are more readily recyclable. This will also provide flexibility in the system should markets change.

QLDC strongly supports the inclusion of glass beverage containers in the NZ CRS as the current voluntary product stewardship scheme is problematic, not achieving goals and costly to rate payers.

On 1 July 2019 QLDC moved to a mixed-colour 240l wheelie bin for glass collection. This enabled the community to recycle glass back into glass and was one of the key actions in the QLDC WMMP 2018. On average, it costs QLDC \$60 per tonne to transport glass to the 5R hub in Christchurch. The costs to recycle glass back into glass are highly dependent on geographic location and as such the introduction of a CRS must ensure greater parity across the country for those costs. QLDC receives \$10 per tonne on sale of the product. Exclusive of the costs of kerbside collection, the net revenue for glass in 20/21 was -\$155K and in 19/20 -\$207K.

QLDC recently audited all glass streams (commercial, residential, public place bin, and public drop off) with funding assistance provided by the Glass Packaging Forum. 145,730 kgs of glass was audited in 100 audits. The percentage of contamination across all glass streams was found to be only 0.35%. This was a lower contamination rate than previous audits conducted on kerbside and public place bins (1.3% and 0.9% respectively). Despite this very low level of contamination, NZ's glass re-processor has advised QLDC that the quality of our glass does not meet their acceptance criteria and have indicated they will either charge to audit our loads and remove contamination and/or charge the disposal costs for rejected loads.

The local community is passionate and committed to recycle glass back into glass but the existing arrangement under a voluntary product stewardship scheme may force QLDC to downcycle glass into roading aggregate due to the high cost and risk of load rejection. This is not an outcome QLDC want for the community. To avoid this outcome, it is essential that glass beverage containers are included in the NZ CRS.

Automated kerbside collection is considered the safest collection methodology and was highlighted as the preferred methodology by collection contractors during our latest contract tender process. QLDC will not compromise the safety of workers or members of the public by changing to a kerbside colour-sort which appears to be the re-processors preferred methodology for accepting glass.

CRS and refillables are complementary systems. In order to shift more rapidly up the waste hierarchy and meet emissions reduction targets, reusables should be factored into CRS design and implementation from the get-go to ensure that any new infrastructure or systems needed for a CRS can accommodate refillables as well as one-way/single-use containers.

Including refillables in the scheme from the outset, also strengthens the need for including glass because it is a highly suitable material for refillables.

7. If you do not agree with the proposed broad scope (refer to Question 6), please select all container material types that you think should be included in the scheme. – glass; plastic (PET, HDPE, PP, and recyclable bio-based HDPE and PET); metal (e.g., aluminium, and non-ferrous metals such as steel, tinplate, and bimetals); liquid paperboard

The scope needs to include 'all beverage containers regardless of material type or container size'. This will ensure that producers cannot bypass the CRS system by producing a beverage container out of a different product or a different size.

QLDC strongly supports the inclusion of glass beverage containers in the NZ CRS as the current voluntary product stewardship scheme is problematic and costly to rate payers (refer response to previous question for more detail).

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

No. The process should be the other way around whereby all beverage containers are included regardless of material type or container size, and individual exemptions from the scheme are considered on a case-by-case basis. The variable scheme fee should be set to dis-incentivise less desirable materials and effectively push them out of the market. Conversely, a low fee on a refillable beverage container would encourage uptake and wide distribution.

The local community has demonstrated that the simpler the message, the better the outcome. This is demonstrated through the low levels of contamination in the local glass stream. When compared to mixed recycling, it is clear that plastics in particular create confusion in the community. This is largely

attributed to complicated messaging and poor product labelling. By allowing exemptions it makes messaging difficult and leads to less desirable outcomes.

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

No. For the scheme to be successful, all beverage containers need to be included in the scheme. This makes the messaging clear and consistent for the community.

The consultation document states that the main gap in the recovery of fresh milk containers is from the commercial and hospitality sector. Inclusion in the scheme would incentivise the return of containers from workplaces and the hospitality sector and be consistent with behaviour both in the workplace and at home.

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

No. All beverage containers, including fresh milk beverage containers, need to be included in the NZ CRS. Exempting milk containers would unfairly disadvantage plant-based milk alternatives that are being chosen by some as a lower emissions product.

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

No, this would be an inefficient approach. All beverage containers, including fresh milk beverage containers, need to be included in the NZ CRS. Priority product status and targeted schemes should be applied only to broad categories of challenging product types, not individual products such as fresh milk containers.

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. This is likely to cause confusion in the community as many containers can be refilled and any definition is likely to be unclear or misinterpreted. All beverage containers, whether refillable or not, need to be included in the NZ CRS.

In order to shift more rapidly up the waste hierarchy and meet emissions reduction targets, reusables should be factored into CRS design and implementation from the get-go to ensure that any new infrastructure or systems needed for a CRS can accommodate refillables as well as one-way/single-use containers. Implementation of CRS should not be viewed solely as an opportunity to increase recycling and reduce litter. Its focus should be aligned with the waste hierarchy and incentivise reuse for beverage packaging in Aotearoa.

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

Yes. To encourage re-use and establish systems for refillable containers, targets for reuse schemes should be developed.

Supporting policy and investment are needed to ensure a CRS can be properly leveraged for reuse.

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?

Develop binding refillables quotas or targets. If there are targets for refillable beverage containers within the CRS, then there should also be consequences for industry failing to meet those targets.

As is being done with the Plastics Innovation Fund, Government should provide investment in washing facilities for refillables and pilots demonstrating reuse systems.

Government could consider providing tax incentives for innovative reuse models and supporting development of standardised reusable bottles to reduce costs and logistical complexity for a refillables market.

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

No. The scope needs to include 'all beverage containers regardless of material type or container size'.

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

No. The scope needs to include 'all beverage containers regardless of material type or container size'. Consideration will need to be given for how to deal with containers larger than 3 litres as these cannot be collected kerbside and are unlikely to be able to be returned to point-of-sale. These may need to be taken directly to Refuse Transfer Stations or Depots for recycling.

17. Do you think that consumers should be encouraged to put lids back on their containers (if possible) before they return them for recycling under the scheme?

No. This will create confusion as local education campaigns for kerbside all include 'no lids' messaging. Lids cannot be placed in kerbside bins as they cannot be recovered through the QLDC MRF and if placed in kerbside and public place bins, they contaminate other commodities during processing. Additionally, containers are more likely to contain leftover liquid if lids are left on this is something QLDC have witnessed in audits of kerbside and public place bins. It is important to keep all messaging consistent regardless of collection method.

All messaging, whether for NZ CSR or kerbside needs to be 'no lids'. Support for loose lid recycling can be achieved through more appropriate means such as public drop offs.

Research should be undertaken to develop container lids which are made from the same material and do not detach from the beverage container and cause problems at sorting facilities. The 'ring pull' on an aluminium can is an effective and successful example.

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

Yes, but only if the messaging of 'no lids' can be clearly distinguished. I.e., if reverse vending machines are used, there is a separate receiving slot for lids.

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. QLDC supports a mixed-return model approach with significant investment in resource recovery hubs such as those operated by the Zero Waste Network. Users of depots and RVMs within a network of community focussed hubs increases the opportunity to learn, connect and understand wider environmental and waste minimisation efforts and opportunities. Increasing support for the community focussed hubs also helps create jobs and local economic development by keeping money in the community within an existing environment based on the waste hierarchy. QLDC supports a model whereby retail participation is mandated for all retailers who sell beverages in beverage containers as per the definition. Exemptions could be applied for under certain circumstances, for example located

within x metres of an alternative return/refund point. Voluntary participation in the network is also supported to make return/refund points as accessible as possible.

20. Where would you find it easiest to return eligible beverage containers? Please select all that are relevant and rank these from most preferred - commercial recycling facility (e.g., depot, more likely to be located in industrial zone); waste transfer station; other community centres/hubs (e.g., town hall, sports club, etc); local retail outlet that sells beverages (e.g., dairy, convenience store, bottle shop, petrol station); supermarket; community recycling/resource recovery centre; shopping centre/mall; other (please specify)

QLDC supports a mixed model 'right to return' approach as multiple options are likely to be of most benefit to the community and further feedback should be sought in future consultation phases on this topic.

To achieve a high target return rate, the return system must be convenient. Everyone should be within a reasonable distance of a return point. The government should determine what the minimum number of container return points is, how these should be distributed across the country.

A mixed-return model provides for resilience in the system and also creates additional benefits other than materials recovery. For example, by including community recycling/resource recovery centres as return facilities, it provides an opportunity to highlight other waste diversion options, promote zero waste living, and create green jobs for local communities. Wānaka Wastebusters is one such example within the district that would benefit from being able to participate as a return facility alongside beverage retailers.

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)

No. All retailers who sell beverage products should be required to take them back, unless they apply for and are approved an exemption.

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)

No. An exemption process could be warranted for rural retailers based on a minimum distance from an alternative receiving depot.

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. However, any exemption should be applied for, and not automatically given. Exemptions would also need to be reviewed on a regular basis to ensure circumstances haven't changed.

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

Yes. Beverage producers should pay for the scheme fees and the deposit fees on all eligible containers regardless of whether containers are returned. This will ensure producers are not incentivised towards

lower return rates and the fees associated with non-returned containers can help offset costs of the managing agency.

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

No. QLDC supports an independent managing agency with comprehensive stakeholder representation including the Social Enterprise Sector to amplify the wider circular economy movement and ensure commercial interests are not over-prioritised versus public good.

QLDC supports strong collaboration and stakeholder representation on an independent managing agency to build strong relationships between the participants involved in operation, management, and governance of the scheme.

26. Do you agree with the recovery targets for a NZ CRS of 85 percent by year 3, and 90 percent by year 5?

Yes, noting that review of the scheme will be required to ensure targets are realistic.

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. Regular review of the scheme will be required to ensure targets are realistic and achievable. If targets are not met legislated consequences such as financial penalties must be implemented.

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

QLDC fully supports the establishment of the NZ CRS to demonstrate leadership and action towards a circular economy in a way that New Zealanders and visitors are already familiar. Extended producer responsibility and return schemes will help ensure that products are designed for a circular economy and will establish a better understanding for purchasers of their impact on the environment. A well-designed CRS will not only recover materials and reduce emissions, but will also promote other zero waste behaviours, bring funds to communities, and create new green jobs. A deposit scheme rather than a redemption scheme will mean that all containers in the scheme have a deposit cost, rather than only those that are actually returned. Un-redeemed deposits could be used to fund actions such as infrastructure for the refillables network.

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? (e.g., the deposit amount, scope of containers, network design, governance model, scheme financial model, etc). Please explain.

QLDC strongly supports the establishment of the NZ CRS.

For the scheme to be effective, fair, and return maximum benefits to the community, it needs to be comprehensive, equitably designed with all stakeholders and not managed by industry alone.

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

Capacity issues of reprocessors is a limiting factor that needs to be considered prior to implementing the NZ CRS. For example – only half the liquid paperboard sold in NZ can currently be accepted for reprocessing by Tetra Pak and Visy has a cap on the amount of recycled glass it can accept. These limitations provide additional weight to include refillables in the scheme.

Standard product labelling should be a requirement for all packaged goods sold in New Zealand. QLDC supports nationally mandated labelling for recyclability and compostability on all packaging such as the Australasian Recycling Label (ARL) scheme, and producers should be regulated for providing

greater transparency of environmental impacts on their products. Clear labelling will reduce consumer confusion and enable more product to be recycled or disposed of correctly.

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

Yes. However, consideration needs to be given to Councils that do not have access to re-processors and those operating non-optical sorting MRF's. The standard set of materials cannot be designed for the larger Councils without consideration of these impacts on other regions, in particular the South Island where access to reliable markets is expensive, non-existent and/or limited.

The proposal is to accept all PET (including coloured). QLDC does not have access to either a New Zealand or international market for coloured PET. QLDC does not accept coloured PET at kerbside for that reason as it is important that the local community has trust in the recycling system and are not being asked to place items in the bin that cannot be recycled. QLDC does not support the inclusion of coloured PET if there is no market for this product. QLDC needs to maintain trust and confidence in local recycling systems so that people are motivated to recycle and know how to recycle correctly.

QLDC supports the proposal that materials collected kerbside must be able to be processed by both manual and automated MRF's. However, QLDC are concerned about PET meat trays, biscuit trays, and punnets. At present QLDC cannot accept these materials kerbside as NZ's re-processor will not accept these products from facilities with no optical sort in place. QLDC fully supports the ban of PVC trays in 2022 which in theory should resolve this issue. However, NZ's re-processor has advised the local waste contractor that while they may review their decision after PVC trays have been banned, they have not confirmed their position, meaning there is a risk that PET meat trays, biscuit trays and punnets will still not be accepted from the facility even after PVC trays have been banned. QLDC is planning a new facility within the next 5-8 years and are looking to incorporate this technology to enable products such as these to be accepted.

QLDC's waste contractor has expressed concern regarding the inclusion of pizza boxes in a standardised kerbside system as these are viewed as an avoidable contamination which risks downgrading OCC quality resulting in potential rejection at the end market, and subsequently adverse publicity, and cost.

A national standard approach for materials accepted in public place bins should also be developed.

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. Standardisation is important to reduce confusion regarding what can and cannot be recycled. However, the standard set of materials cannot be designed for the larger Councils without consideration of these impacts on other regions, in particular the South Island where access to reliable markets is expensive, non-existent and/or limited.

QLDC fully supports an approach that will lead to greater consistency of services and infrastructure across the country. There will be the reality of some small, rural, and or remote communities where it is not realistic to provide the same level of service as a more densely populated area. Alternative local solutions should be supported for these communities.

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

No. The existing voluntary system is not working. Regulation is required along with supporting infrastructure and funding to ensure collection and transportation to reliable markets does not

disadvantage some Councils, in particular regional South Island where access to re-processors is limited or more costly than the North Island.

34. Please tick below all the items from the proposed list which you agree should be included in the standard set of materials that can be recycled in household kerbside collections. glass bottles and jars; paper and cardboard; pizza boxes; steel and aluminium tins and cans; plastic bottles 1 (PET) and 2 (HDPE); plastic containers and trays 1 (PET) and 2 (HDPE); plastic containers 5 (PP).

QLDC largely supports the proposed list with the following exclusions

- *Coloured PET – QLDC does not support the inclusion of coloured PET if there is no market for this product. QLDC would like to support the inclusion of PET meat trays, biscuit trays, and punnets, however these may not be accepted by NZ's re-processor even after PVC trays are banned.*
- *Pizza boxes*

QLDC strongly supports items accepted kerbside being consistent with those accepted via the NZ CRS. This will ensure consistent and less confusing messaging to local communities. QLDC experience that clear, consistent, and simple messages work most effectively to change behaviour.

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

Coloured PET – QLDC does not support the inclusion of coloured PET if there is no market for this product.

Pizza boxes – Pizza boxes are an avoidable contamination and QLDCs waste contractor (NZ's largest) believes OCC quality should not be deliberately downgraded by introducing a source of contamination. Contamination is more likely to be leftover grease and cheese that is stuck to the boxes, than leftover pizza slices. Grease is problematic to fibre recycling. If pizza boxes are included, loads risk rejection overseas which could result in the whole shipment being returned to NZ, with resulting adverse publicity and cost.

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

To ensure that messaging is consistent and not confusing to the community, the materials collected via the NZ CRS should be the same as those collected kerbside. This means that if LPB is collected via the NZ CRS, QLDC supports its inclusion in the standard materials collected kerbside.

In addition, clear messaging is required on how materials are to be presented such as clean, no lids, triggers or pumps, and size requirements.

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

Yes, and likewise materials removed if markets no longer exist. Noting the cost to Councils, if having to change collection mechanisms, messaging etc, this would need to be supported by additional funding through product stewardship fees.

38. What should be considered when determining whether a class of materials should be accepted at kerbside in the future? (Tick all that apply) - sustainable end markets; end markets solutions are circular and minimise environmental harm; viable processing technologies; processing by both automated and manual material recovery facilities; no adverse effects on local authorities, including financial; supply chains contribute appropriately to recovery and end-of-life solutions for their products; other (please specify).

All of the above and additionally the size of the market capacity of the re-processors. Capacity issues of re-processors is a limiting factor that needs to be considered.

39. Who should decide how new materials are added to the list? the responsible Minister; Ministry for the Environment staff in consultation with a reference stakeholder group; existing Waste Advisory Board; an independent board; other (please specify).

QLDC supports the decisions being made either by an independent board or Ministry for the Environment staff in consultation with a comprehensive reference stakeholder group

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. QLDC strongly supports product take back schemes where recycling costs are built into the cost of a product so that costs attached to the provision of recycling items that cannot be accepted via the kerbside system is not at the expense of councils, ratepayers, or the social enterprise sector. QLDC also supports greater collaboration with the NGOs, community, and the social enterprise sector to provide a network of convenient recycling/zero waste hub locations to amplify the shift to a circular economy.

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

Yes. Diverting food and garden waste from landfill will produce environmental, economic, and social benefits locally and nationally.

A recent composition analysis of Queenstown Lakes District waste to landfill has identified organic material as the largest component, comprising 25.6% of the total by weight. However, access to suitable facilities for processing this material and diverting it from landfill is a limiting factor in the district and many other parts of New Zealand. A facilitated and supported, regional approach to plan for and invest in services and infrastructure needs to be adopted.

Investment in services and infrastructure must be considered wider than the usual household services and include waste generated by businesses. This must include solutions for organic material streams such as animal manure, forestry biomass, biosolids and treated/untreated timber.

It is crucial that sustainable end markets are developed for each of the products alongside investment in services and infrastructure.

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. QLDC has funding in this LTP for developing a detailed business case to divert organic materials from landfill but has not secured funding to build or operate an organics composting facility.

Diversion of organic material from landfill to beneficial use should be a priority. Not only to reduce waste and emissions but for the additional social, health, environmental and economic benefits derived from beneficial reuse of organics. Quality soil to grow nutrient dense food is crucial and can be used from small scale community food growing initiatives through to large scale regenerative agriculture practices in the local primary sector.

However, the reality is significant investment in infrastructure is required. Many Councils, including QLDC, have considered or are considering introduction of kerbside organics collections. A regional approach to plan for and invest in services and infrastructure needs to be adopted as in many regions' facilities would not be economically viable due to low volumes of organic materials. Transportation

costs to other regions where facilities are located is often prohibitive and not well aligned with emissions reduction objectives.

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?

QLDC fully supports an approach that will lead to greater consistency of services and infrastructure across the country. There will be the reality of some small, rural, and or remote communities where it is not realistic to provide the same level of service as a more densely populated area. Alternative approaches such as localised community composting hubs should be considered as an alternative where a kerbside collection is not viable.

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 (e.g., promoting evergreen trees over deciduous)?; Other (please specify)?

Yes. All options are possible. QLDC currently subsidises green waste drop off at RTS's and also in the remote communities. Product left at dedicated areas is mulched and reused on Council parks and gardens or used by the community.

Offering a subsidised green waste bin is likely to bring material into the kerbside collection that is currently diverted via other services.

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. Access to suitable facilities is a limiting factor in many parts of New Zealand. A phased approach to develop new facilities will be required. It will not be realistic to provide some small, rural, and or remote communities the same level of service as a more densely populated area. Alternative approaches should be supported for these communities.

It is crucial that research and development of sustainable end markets that maximise the benefits of organic diversion, such as regenerative agriculture and carbon sequestration are undertaken and information shared widely.

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. Some Councils may be able to review their priorities in order to deliver a food scraps service, while others may not within allocated funding. Any changes to Council services would need to provide enough lead in time for those Councils to plan for in their LTP process.

With additional funding provided by Government, 2025 should provide sufficient time for Councils with access to existing facilities to deliver a kerbside food scraps collection service.

47. Do you agree that councils without existing infrastructure should have until 2030 to deliver food scraps collections? yes, that's enough time; no, that's not enough time; no, it should be sooner.

Yes. QLDC fully supports diversion of organic material from landfill, however a lack of infrastructure and funding are current limiting factors for our district. A regional approach to plan for and invest in

services and infrastructure needs to be adopted as facilities in some areas of Otago and Southland may not be viable due to low volumes of organic materials.

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.

It is clear from the list that significant investment in infrastructure is required and that the development of an organic waste management strategy, guidance, policies, and a comprehensive framework for reduction of and beneficial reuse of organic waste is needed.

49. We propose to exclude the following non-food products and any packaging from any kerbside collection bins used to divert food scraps and/or green waste from landfills: kitchen paper towels / hand towels / serviettes; newspaper and shredded paper; food-soiled cardboard containers (e.g., pizza boxes); cardboard and egg cartons; compostable plastic products and packaging; compostable fibre products and packaging; compostable bin liners; tea bags. Are there any additional materials that should be excluded from kerbside food and garden bins? Please explain which ones and why.

Yes. Depending on the methodology used for processing, unless the facility can accept items such as noxious weeds (e.g., broom, gorse) and items that are difficult to process (e.g., flax and cabbage tree leaves) then these items will also need to be excluded. Careful consideration should also be given to the acceptance of organic materials that may cause herbicide or pesticide contamination of compost or soil amendments. Clopyralid and aminopyralid are examples of herbicides that persist through the composting process and cause significant damage to particular crops.

Producing quality compost and soil amendments that have sustainable end markets and can be used for small scale community food growing initiatives through to large scale regenerative agriculture practices in the local primary sector is crucial.

50. For non-food products or packaging to be accepted in a food scraps bin or a food and garden waste bin, what should be taken into consideration? Tick all that apply - products help divert food waste from landfills; products meet New Zealand standards for compostability; products are certified in their final form to ensure they do not pose a risk to soil or human health; products are clearly labelled so that they can be distinguished from non-compostable products; a technology or process is available to easily identify and sort compostable from non-compostable products; producers and users of the products and packaging contribute to the cost of collecting and processing.

All of the above.

51. If you think any of the materials listed above should be included in kerbside food and garden bins, please explain which ones and why.

No. Clear, consistent, and simple messages work most effectively to change behaviour. The message of 'food scraps and garden scraps in this bin' is clear. To include other items will be less effective and likely lead to higher contamination levels.

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

Yes. Measurements of the activity and impact across all levels of the waste hierarchy should be adopted and shared widely so that progress at the top of the hierarchy can be monitored.

53. Do you agree with the proposal that the private sector should also report on their household kerbside collections so that the overall performance of kerbside services in the region can be understood?

Yes. Reporting measures demonstrating progress across both the public and private sector need to be developed. Reporting should not be left to government agencies alone but should include requirements for all waste collectors.

To capture meaningful data, it is essential to establish new legislation for licensing systems for waste collection and disposal, resource recovery (including organics) and the recycling sector. A licensing system to obtain data is fundamental precursor to establish the NZ circular economy both at local and national levels.

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

Yes. Information on progress should be publicly available, and if totalled for the region, needs to be split between public and private sector.

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

Yes. To ensure progress against targets, key indicators of progress should be publicly available. Data should include end market information to ensure public confidence in the system.

QLDC notes that the diversion and contamination rates for each region will need independent verification as data between regions, or even collectors may not be comparable.

Contamination rates are usually determined either through undertaking kerbside audits, SWAPS, or as an average percentage of material processed. QLDC's MRF only has one infeed for household kerbside and commercial recycling. As such, the precise contamination rate for kerbside household recycling alone cannot be determined as it is mixed with commercial product at the infeed.

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)?

No. The focus for measuring performance needs to also include focus on reducing waste generated. Councils can provide the standardised kerbside service and encourage use through education and behaviour campaigns, but QLDC does not believe the proposed performance standard supports activity at the top of the waste hierarchy i.e., reduction in consumption of goods. Focusing on just recycling and landfill data from household kerbside collections does not encourage activity at the top of the hierarchy.

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

Yes. QLDC supports highly ambitious targets to move towards zero waste targets not just for households but also for the commercial sector.

A region that is performing better at the top of the hierarchy will likely have lower diversion rates at kerbside if the current proposed methodology is applied.

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?

No. QLDC believe the proposed methodology is flawed and does not place the emphasis at the top of the waste hierarchy where it is needed to bring the biggest change.

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. High performance targets placed at the top of the hierarchy are supported.

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

Yes. High performance targets placed at the top of the hierarchy are supported.

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

As true diversion cannot be measured using a percentage of materials placed at kerbside for recycling, the proposed targets should not incur consequences for not achieving.

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.

Separated, but councils choose which one to separate. It is important that collection systems do not result in contamination of recycling commodities. For example, glass shards in paper and OCC. QLDC already collects mixed coloured glass separately in a 240l wheelie bin.

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.

Some Councils may be able to review priorities in order to deliver a separate glass or paper/cardboard service, while others may not within allocated funding. Any changes would need to provide enough lead in time for Councils to plan for and feed into their LTP processes.

64. Should all councils offer household kerbside recycling services?

Yes. QLDC would like to see more of the communities' waste costs and responsibilities to the environment being pushed back to the producers of goods and consumer products. Paying for the end of life of consumer products and their associated environmental harm should not be left to ratepayers. The introduction of product stewardship and resource recovery schemes, and a focus on the top of the waste hierarchy should in future negate the need for these materials to be presented kerbside at the cost of Council ratepayers.

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

Yes. QLDC fully supports an approach that will lead to greater consistency of services and infrastructure across the country. There will be the reality of some small, rural, and or remote communities where it is not realistic to provide the same level of service as a more densely populated area. Alternative approaches should be supported for local solutions in these communities.

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

Yes. The WMMP should outline the strategy while funding is typically sourced via the LTP process and as such any changes need to align with this process (unless alternative funding can be sought). Many Councils, including QLDC, have already had to make trade-offs through the LTP process, balancing priorities with limited funding, in order to keep rate increases as low as possible during a global pandemic when pressures on households are immense.

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

Research – QLDC officers acknowledge the beneficial research which has already been completed to date and agree that the proposed additional pieces of research presented in the consultation document on page 96 would be useful.

Additional research linked to successful behaviour change initiatives implemented nationally and internationally would be welcomed alongside continued research into national reuse behaviour including barriers to uptake. Behaviour change and impact measurement guidance and tools would aid councils in measuring the success of initiatives.

Additionally, research and case studies on best practice and innovative waste facilities would be useful for councils and other groups planning future zero waste/resource recovery hubs.

Funding - For behaviour change to be effective, messaging needs to be clear, consistent, simple, constant, and provided via multiple mediums/platforms. This needs to be funded and driven at a national level by Central Government and supported at a local level by Local Government and community partners. Waste levy funds need to be available across a wide range of disciplines not limited to Councils, however, 50% of the levy revenue should continue to be available to Councils to support the implementation of their WMMPs. Funding support should be made available to rapidly support infrastructure that not only reduces waste but significantly reduces emissions. Many Councils are constrained by funding in their LTPs due to conflicting priorities and impacts of Covid. The levy amounts should not be based on a Council population basis alone but reflect areas of significant under-investment and areas with higher-than-average demand on services due to high visitor numbers. Initiatives which help reach NZ's emissions reduction goals should be prioritised.

Regulation - New Zealand must urgently work towards bolder use of existing regulatory tools and economic instruments such as the mandatory product stewardship regulatory approach. It is imperative that responsibility and regulatory interventions are spread more evenly across production supply chains, with more emphasis on requiring designers, businesses, and producers to take responsibility upstream to reduce the waste their products create, e.g., through the redesign of products and business models. The design out of waste through regulated policy and mandatory accreditation schemes will support rapid behaviour change from designers and producers right through to consumers.

Legislation – New legislation is required with stronger penalties. Legislation needs to support phase-outs and eventual bans of hard to recycle and problematic items.

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

Yes. Food loss and waste currently contributes to 8% of global greenhouse gas emissions. Reducing food waste is ranked as the third best global solution in addressing climate change¹. As such, diversion

¹ [Home | NZ Champions 12.3 \(nzchampions123.org\)](https://www.nzchampions123.org/)

of organic material from landfill to beneficial use should be a priority not only to reduce waste and emissions but for the additional social, environmental, and economic benefits.

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

Yes. The Ministry should encourage diversion strategies focussed up the food recovery hierarchy which provides useful guidelines for governments, food manufacturers, grocery retailers, growers, and consumers in deciding how to prevent and manage food waste.

Access to suitable facilities is a limiting factor in many parts of New Zealand, however many businesses have the ability to deal with their own food waste. If new infrastructure is needed, when considering consenting and build times, 2030 seems reasonable.

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

Yes. Access to suitable facilities is a limiting factor in many parts of New Zealand. Those businesses in areas where suitable infrastructure already exists should be able to divert food waste ahead of those areas where new infrastructure is required to be built.

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

No. All businesses should be required to comply.

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

No. All businesses should be required to comply.

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

The Ministry should promote a food recovery hierarchy, including in outreach materials. The hierarchy should encourage (in order of preference) source reduction, feeding hungry people, feeding animals, and composting, with disposal as a last resort. Linking the organic materials sector more clearly with the agricultural sector and incentivising a shift to regenerative farming practices needs to be included.

The Ministry should include targets for businesses which can encourage widespread change.

To reduce barriers to food donation, the Ministry should undertake consultation with stakeholders and establish guidance on food safety in food recovery/donation initiatives.

The Ministry should provide the opportunity for businesses to report food recovery activities and create a recognition programme for businesses that recover food.

To minimise food loss, the Ministry should support initiatives to establish clear date labelling to reduce confusion between Best Before and Use By labels. Businesses will need to be guided through these changes with access to education materials, case studies and funding to implement or trial innovative solutions.