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Ministry for the Environment
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Submission on *Te panoni I te hangarua: Transforming recycling*

The Canterbury Mayoral Forum (the Forum) thanks the Ministry for the Environment for the opportunity to provide feedback on the technical consultation document *Te panoni I te hangarua: Transforming recycling*, published in March 2022.

The Forum comprises the mayors of the ten territorial authorities in Canterbury and the Chair of the Canterbury Regional Council (Environment Canterbury) supported by our Chief Executives. The purpose of the Forum is to promote collaboration across the region and increase the effectiveness of local government in meeting the needs of Canterbury's communities.

The ten territorial authorities are: Kaikōura, Hurunui, Waimakariri, Selwyn, Ashburton, Timaru, Mackenzie, Waimate and Waitaki District Councils; the Christchurch City Council; and Environment Canterbury.

The following submission has been developed with input from across Canterbury councils and focuses on matters of general agreement. We note that the Christchurch City, Timaru District and Waitaki District councils are also planning to make individual submissions.

The specific discussion questions and the Forum's responses are provided in the attached document.

Our secretariat is available to provide any further information or answer any questions the Ministry may have about our submission. Contact details are Maree McNeilly, Canterbury Mayoral Forum Secretariat, secretariat@canterburymayors.org.nz, 027 381 8924.

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Ngā mihi



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Canterbury Mayoral Forum submission Te panoni I te hangarua: Transforming Recycling

Part One: Container Return Scheme

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

Yes, the inclusion of all beverage types is consistent with overseas best practice and represents a broad-based system which will be easier for the public to understand and therefore support implementation and participation.

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

Yes, the inclusion of all rigid beverage container types is suitable, with separate management and / or phasing out of alternative container types (e.g. pouches and bladders). We consider this, combined with potential eco-modulation, will support the recovery of recoverable materials for recycling.

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

Yes. The Forum agrees this will provide a suitable incentive to encourage participation, without putting too much additional cost on the container at point of sale - provided it will be reviewed and increased, when necessary, as proposed.

4 How would you like to receive your refunds for containers?

Councils would prefer electronic funds transfer, but for our residents and businesses participating we would support access to all options. This will enable retailers to provide customers with a reasonable choice for distributing Container Return Scheme (CRS) refunds, including as a payment, deduction from costs or as a form of donation.

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

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

Yes. This is aligned with waste minimisation hierarchy principles. Eco-modulation has a potential role to play in encouraging greater resource efficiency, including incentivising packaging with higher recovery value or lower re-uses cost. It will be good to have an end-disposal point for reusable containers that might otherwise not be recyclable through Council collections and community drop-offs. There will, however, need to be flexibility designed into this system to close potential loopholes.

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

The Forum considers the inclusion of all container materials is necessary to encourage consumers to address all beverage container types, not just those that are easy to recycle. In addition, this scope will retain consumer choice and brings in acceptability of disposal/reprocessing costs as part of the costs of the product.

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.

The Forum agrees with the proposed scope, presuming bio-based plastics do not affect petroleum-based plastics during recycling processes.

- a. glass
- b. plastic (PET 1, HDPE 2, PP 5, and recyclable bio-based HDPE and PET)
- c. metal (e.g., aluminium and non-ferrous metals such as steel, tinplate and bi-metals)
- d. liquid paperboard

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?

We support the case-by-case consideration of alternative beverage container packaging types. We consider this approach will allow for innovation and industry development of alternatives and/or any unforeseen impacts of introducing the CRS.

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

The Forum recognises potential cost-of-living concerns may be driving the proposal to exempt staple products such as fresh milk from the proposed NZ CRS. However, given fresh milk accounts for 30 per cent of total beverage sales and is readily recyclable, from an operational perspective it is recommended that fresh milk be included in the NZ CRS. The inclusion of fresh milk would support a simple and functional classification system with all containers (up to 3L) included. We note however that there are some differing views on this in individual districts in the region.

In addition to the inclusion of fresh milk, the Forum would like to highlight the potential benefits of regulating lid colours to further improve recyclability. A recent example of this approach is that of UK food and grocery chain Waitrose, who has shifted from producing coloured lids across their fresh milk range to clear lids only. Clear lids can be recycled into food-grade packaging, along with the containers, rather than requiring separation from containers.

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

Notwithstanding Q9 above, the Forum supports further investigation by MfE and believes that recovery of fresh milk containers from commercial premises in particular needs to be incentivised.

For example, commercial premises could be required to separate recyclable materials, including HDPE containers, which would lead to higher recovery levels of recycling (although many commercial entities already have their plastic milk bottles collected when new stock is delivered).

We note that there are some alternatives being offered in the way of reusable 'bulk milk' containers in a few locations and consider that this should be encouraged or incentivised.

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?

The Forum supports extended producer responsibility and greater control over the types of containers (e.g. multi layered containers) for fresh milk. However, we consider that a new separate system will further confuse consumers, and would support fresh milk beverage containers being included in the CRS (as referenced in our answer to Q9).

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?

The Forum agrees that reuse/refill systems should be kept separate from recycling, as this is a different model in the circular economy. Refillables are less likely to need to be collected as recycling or become litter compared to other beverage containers.

Recycling is not the optimal outcome from a CRS; moving to refillable systems is, and there are already businesses doing this across the country. Communities should have the benefit of a CRS system that endorses a move to refillable systems, not a CRS that simply accepts the status quo of billions of single use containers.

However, we acknowledge that return fees for refillables may also need to be regulated to ensure recovery for re-use is occurring. We would support a public education and incentive programme to encourage re-use.

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 consider refillables are the future of packaging. Single-use packaging should be eliminated where this is practicable to do so.

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?

While the Forum supports mandatory reporting requirements for refillables, we do not see a direct link between the NZ CRS and the potential refillables targets. It is important that refillables targets address the reusable products payback period, including embedded carbon (e.g. number of times re-used), however if reusable containers are only used once they do not achieve this objective and should be included in a CRS.

We also consider clear and strengthened proposals are needed to increase refillables schemes to future-proof them and ensure circularity. A dedicated (levy) fund is necessary to back a range of refillable schemes across all different product types, and fledgling schemes should be subsidised to get them to critical mass/volume to compete with single use.

This should be part of a wider education campaign to push actions "up the pipe" to reduce and reuse.

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

The Forum would support the exemption of medicine packaging.

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

While a CRS will encourage consumers to consider larger containers (e.g. for water) than individual bottles, reducing single use behaviours, the Forum agrees there is a need to have a maximum limit for practicality of the scheme. This would also be consistent with current kerbside processing and public messaging in many council areas.

However, we consider there should be some way to capture larger containers, especially with the increasing purchase of large (over three litres) water bottles. The Forum therefore encourages the Ministry to investigate the option of declaring large beverage containers a priority product and thereby including them within another product-stewardship scheme.

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?

The Forum recommends the Government adopt a NZ CRS approach consistent with kerbside standardisation rules, noting that significant education has been undertaken in Canterbury to encourage the removal of lids for recycling. The decision to include/exclude lids should consider site amenity, future handling and or additional sorting/reprocessing required and by preference be as simple for the consumer as possible.

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, we support a requirement for a lid return area/receptacle at return facilities, where this is appropriate. We suggest a "slot" for these lids with clear pictures to show this.

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?

The Forum supports a mixed-return model, including responsibilities for large retailers (supermarkets), opportunities for not-for-profit and NGO involvement and public drop off facilities (depots). To maximise co-benefits to the community, we consider this should also include councils and community recycling facilities / zero waste hubs.

Zero waste hubs can create local employment opportunities, build community resilience and help councils to meet waste minimisation goals and community expectations for action on climate change.

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.

Canterbury councils send all kerbside recycling to materials recovery facilities, and also operate transfer stations and other recycling drop-offs which are well placed for rural residents to bring in

returns. Each of the below sites would have a place in Canterbury, and given the differing demographics of each council area there is no region-wide consensus among our councils over the ranking of these sites.

- a. Commercial recycling facility (e.g., depot, more likely to be located in industrial zone)
- b. Waste transfer station
- c. Other community centres/hubs (e.g., town hall, sports club, etc)
- d. Local retail outlet that sells beverages (e.g., dairy, convenience store, bottle shop, petrol station)
- e. Supermarket
- f. Community recycling/resource recovery centre
- g. Shopping centre/mall
- h. Other (please specify) Petrol stations - given the number of drinks in single use plastic they sell, convenient for both urban and rural consumers.

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

Yes. However, we note this would be dependent on the size of supermarkets within each population centre. Councils have mixed views on the scale of floor requirements but agree that the definition of floor space needs to relate to the sale of beverage containers (or food and grocery) as opposed to an entire store which may sell a broad variety of products (e.g. a rural general store).

The transforming recycling consultation document seems to infer takeback will be limited to supermarkets; however it is not clear whether the store size thresholds (Q21-22) relate only to supermarkets or all retail premises that sell beverages.

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

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

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?

The Forum has mixed views on the scale of floor requirements but there is agreement that the definition of floor space needs to relate to the sale of beverage containers (or food and grocery) as opposed to an entire store which may sell a broad variety of products (e.g. a rural general store).

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

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

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, subject to agreement between the parties (that is, neighbouring retailers) and public advertising of nearby location at exempt location. We however note that this could be difficult to administer or advertise – residents would need to understand the system. For example, if some dairies have return and others do not, the labelling needs to be very clear.

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

Yes. We consider this model would create revenue from unclaimed deposits to cover scheme costs, and ensure the scheme prioritises recovery of containers.

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

The NZ CRS needs to be not for profit. If industry-led then needs to be 'deposit financial model'.

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, noting that 85 per cent is consistent with overseas models and ensures the scheme delivers real change.

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?

The Forum reiterates the need to ensure recovery targets and rollout of collection facilities are linked to and support achievement of targets, so if the scheme does not meet its recovery targets it should be reviewed. However will also need to find out what the barriers are to using the scheme and work to reduce them.

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

Yes.

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.

N/A

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

Any excess funds held by the Managing Agency should be used for education to further promote a higher recovery rate.

Part Two: 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. This could be achieved by setting minimum requirements. This would pull “up” the collection of those who are not collecting all they can but would not pull “down” the potential of the current high performing systems (i.e. encouraging investment and innovation in maximising diversion from landfill).

We note that while Canterbury councils are very closely aligned to the proposed standards, many councils are not. Contamination of kerbside recycling is a significant issue, and a large part of the confusion is due to mixed messaging of what can be recycled combined with inconsistencies between collection services. The proposed standards would close the gap, reduce contamination improving the current levels of diversion nationally.

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 when councils continue to collect material (such as lids, LPB, Plastics #3, #4, #6, #7) and where there is no market or the material is considered contamination, it gives the inaccurate impression to the public that this material is being successfully recycled. This undermines public trust.

In addition, conflicting messages in the media can also contribute to this, so companies and advertisers also need clear standards on what is and is not accepted for recycling in New Zealand.

However, one Canterbury council noted their existing performance with very low levels of contamination, demonstrating that low contamination can be achieved despite differences in recyclable materials throughout the country.

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

In general, we agree that regulation is required to achieve national consistency, although voluntary measures could provide an interim approach. All measures would benefit if supported with national recycling labelling (as in Australia) to give the public clear, consistent messaging and the confidence that they are recycling correctly. This would also motivate manufacturers to move towards packaging options that achieve the labelling standards.

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.

The Forum supports all proposed items being included in the standard set of materials that can be recycled in household kerbside collections; however, we question the singling out of pizza boxes as being separate from cardboard.

- 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)** ✓

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

The Forum supports the inclusion of material types only, not the inclusion of specific products (e.g. pizza boxes). Contamination of materials should determine whether it can be recycled, rather than blanket inclusions. One Canterbury council did not support the inclusion of glass in any form, suggesting drop-off facilities a more suitable approach than kerbside collection. We also note that in many council areas, pizza boxes are currently accepted as green waste, and this works effectively for them.

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

RPET and other plastic semi-rigid packaging with recycled content standards should be included on the proposed list.

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

The Forum considers it essential that there is a focus on being open to new opportunities. Having a set regular review period (for example 18 months) would ensure this. The body to conduct reviews should be identified at the introduction of the scheme, and there should be application criteria, where producers who can demonstrate suitability for collection and a national demand for an output product can request inclusion in the kerbside list.

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 ✓
- 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)

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 OR**
- d. **an independent board**
- e. other (please specify).

We believe the decision to include new materials should be made by either the existing Waste Advisory Board or an independent board; and they should ideally include representatives from beverage, packaging, recycling, councils and retailers.

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. A convenient and consistent network of collection facilities would support greater waste diversion and reduce contamination in other collection streams. This approach also provides an opportunity for the regional collection of materials outside of those included in the standard kerbside collection.

Proposal 2: All urban populations should have access to kerbside food scraps collections

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

Yes, where it is practical and economical to do so. This approach supports working towards a low emissions circular economy.

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?

While the Forum supports the diversion of food scraps from landfill, we consider that the proposed standardisation of kerbside services may go too far. Instead, we recommend further work with all stakeholders be conducted on the separation of food scraps to ensure appropriate mechanisms are established, noting that alternative collection methodologies may be preferred.

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?

In addition to our response to Q42, the Forum generally support the inclusion of viable alternatives that may exist.

We also note there should be flexibility to scale operations and technology appropriately and that collaborative approaches and shared facilities should be considered.

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?

The Forum notes views across the region on this are mixed, likely relative to individual councils' own capacity and requirements. In general, the provision of garden waste processing is encouraged but also not a benefit shared by the entire population, so equity of providing a subsidy should also be considered, whether for collection services or for disposal.

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

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. However we note that some systems will take time to be developed, procured and implemented as the infrastructure needs to be in place to ensure the product collected can be easily processed in a cost-effective manner and an end market exists. A combined food organics and garden organics (FOGO) collection should be included in this approach.

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

No, this question assumes that every facility listed would be able to receive more organic waste - some may not be in a position to accept tonnages from outside their region if their region's organic tonnes are projected to grow significantly.

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

The Forum also considers that there would be insufficient time for councils to consult with the community, procure the service and implement it. Timing should be dependent on each council's WMMP review periods and LTP periods.

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

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

In general, yes this would be enough time, however it should be noted that development of essential infrastructure may require long lead-in times.

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

- a. Envirofert – Tuakau
- b. Hampton Downs – Waikato
- c. Mynoke Vermicomposting site – Taupō
- d. Enviro NZ – new facility planned for the Bay of Plenty in 2023
- e. Living Earth – Christchurch
- f. Timaru Eco Compost Facility – Timaru.
- g. Other?

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:

- a. kitchen paper towels / hand towels / serviettes
- b. newspaper and shredded paper
- c. food-soiled cardboard containers (e.g., pizza boxes)
- d. cardboard and egg cartons
- e. **compostable plastic products and packaging** ✓

- f. **compostable fibre products and packaging** ✓
- g. **compostable bin liners** ✓
- h. tea bags.

In general, the Forum agrees with the exclusion of compostable packaging, though we note that many in Canterbury believe fibre should be accepted. We ask that the Government instead look to regulate those emerging contaminants of concern. This would also be supported by clear labelling standards for recycling and compostability in NZ

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

We propose that ash, timber and sawdust are prohibited, in order to reduce arsenic contamination of compost products. This has been found to be a serious issue in both Christchurch and Timaru composting operations and is managed through seasonal advertising.

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.

We support the following being taken into consideration for non-food products or packaging to be accepted in a food scraps or FOGO bin. In addition, where technology or process is available to easily identify and sort compostable from non-compostable products, this could also be considered as an approach (although we are not aware that suitable technology currently exists).

- a. **products help divert food waste from landfills** ✓
- b. **products meet New Zealand standards for composability** ✓ Only if compostable packaging can be identified at collection point
- c. **products are certified in their final form to ensure they do not pose a risk to soil or human health** ✓
- d. **products are clearly labelled so that they can be distinguished from non-compostable products** ✓ Only if compostable packaging can be identified at collection point
- e. **a technology or process is available to easily identify and sort compostable from non-compostable products** ✓
- f. **producers and users of the products and packaging contribute to the cost of collecting and processing** ✓

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

Those Canterbury councils with kerbside food and garden organics collections currently accept the fibre products outlined in our response to Q48. The carbon element of these fibre products is beneficial to the optimising the composting process, particularly during seasonal influences of higher grass clippings in spring and the nitrogen this contributes.

- Kitchen paper towels / hand towels / serviettes and food-soiled cardboard containers (Prevents contamination of recycling if placed in kerbside recycling system).
- Shredded paper – Along with paper smaller than an envelope, as these materials cannot be processed at our current recycling facility.
- Compostable fibre products and packaging should be accepted as long as un-lined (e.g. paper-based food containers, wood-based containers and cutlery).

Existing processing operations, which allow fibre products in these kerbside collections, has resulted in certified organic outputs and high-quality compost with an established demand. Unnecessary exclusion of fibre products would negatively result in more waste to landfill.

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?

The Forum agrees it is important to ensure kerbside collections services are effective and that materials are viable for composting into high quality products with local infrastructure. Good baseline information is most important in establishing successful programmes and can be used to inform where improvement can be made or is required.

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 an insight into where the gaps are and where improvements can be made, but due to commercial sensitivity many are reluctant to report to councils at present. Waste is collected and transported across council boundaries by a range of collection companies, and this movement needs to be tracked. The private sector should therefore report direct to the Ministry and not through council systems. However if they are delivering to council owned and operated transfer stations, there is a risk of duplicating the information reported, so the reporting process will need to be carefully managed to avoid this.

We note that councils tend to provide a domestic-scale services to all properties, including in commercial areas, whereas private industry provide a much more flexible service for businesses. We therefore consider it would be important to extend reporting to cover commercial services as well as household services for organic waste and recycling collections, so we can understand the 'size' of this in comparison to household services.

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

We agree that the information should be published online in aggregated form (that is, by territorial authority area, region and by collection type). This will allow clear and consistent understanding by everyone of the scale and impact of waste being generated. It will generate support for any management approach that will be implemented.

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

We also would support processing statistics/output products, such as compost produced/energy, being published online. Once the availability of this information is advertised well, demand from public and private sector for any further information could be gauged. Quality, well presented data is required.

Proposal 4: Setting targets (or 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)?

Potentially, kerbside diversion services should have to achieve a minimum performance standard, although this will not support waste reduction goals. Setting a minimum performance standard will not only provide councils a clear understanding of what is expected of them but also encourage them to work towards achieving a certain target. Incentives should be given if councils perform better than minimum.

It is also important that any settings account for changing habits including the impact of the CRS and other product stewardship schemes. A more suitable approach could be to set minimum quality targets in the kerbside recycling and maximum quantity/ percentage targets in residual waste category as an alternative.

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

The Forum agrees that a 50 per cent target was a good start but we encourage the Government to consider that maximum allowable recyclables in residual waste of 10 per cent could be a more appropriate target. Quality targets of a maximum 10 per cent contamination is the current industry standard for kerbside recycling. Some in Canterbury expressed a preference for councils to set their targets with agreement by the Ministry.

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?

Preferably any performance targets should be phased in relative to appropriate infrastructure, including being dependent on the availability of and access to organics processing facilities, and on introduction of and impacts of a CRS scheme.

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?

It is important to demonstrate what success looks like, as this will guide territorial authority budgets and investment decisions. Setting a success rate target (for example less than 5 per cent contamination and less than 5 per cent in residual) would be a good approach.

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

A 70 per cent aspirational target could be achievable, but not if kerbside services were only limited to food scraps and recycling; and may not be achievable if the CRS pulls heavier materials from kerbside collections.

Residual waste will continue to be linked to consumption habits, behaviours and availability of convenient resource recovery services. Until producer responsibility is widely in place, the residual waste category will be unlikely to move significantly. Therefore we would suggest a focus on reducing sources of residual waste be prioritised. An example of this could be mandated packaging takeback schemes.

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

Consequences for territorial authorities not meeting minimum performance standards should depend on the circumstances. For example, a lack of infrastructure or other limiting factors would require a different approach to antipathy towards the standards.

Focus should be on incentives that territorial authorities will get when they achieve outstanding performance rather than focusing on how to penalise them. A financial penalty will be at the detriment of what an authority is trying to achieve and would simply take money which could be better used to providing enhanced recycling services. Such an approach would also result in loss of public support for recycling.

Proposal 5: Should glass and/or paper/cardboard be collected in separate containers?

- 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?
- a. glass separate
 - b. paper/cardboard separate
 - c. separated, but Councils choose which one to separate
 - d. **status quo – they remain comingled for some Councils.**

The Forum supports the status quo. In order to introduce compulsory separate collections for either glass or fibre there would need to be a shift in the current ability to process nationally. In addition, any mandate should allow for the impacts of the CRS to be assessed.

We believe minimum quality standards should be required instead, with councils and commercial operators able to choose collection methodologies to meet that standard.

In question 48, the consultation document proposes exclusion from organics of certain non-recyclable fibre products: note that the Forum does not support this exclusion. If this progresses, it would be helpful to understand whether a mandated separate paper collection would address collection of these materials.

- 63 If glass or paper/cardboard is to be collected separately, should implementation:
- a. begin immediately
 - b. wait for any CRS scheme design to be finalised
 - c. **wait until the impact of a CRS scheme has been observed.**

The Forum supports option c. The CRS scheme has the potential to significantly change the composition of material received in kerbside recycling; therefore this should be reviewed once the scheme is introduced and there is sufficient data available. This could only be decided once the outcome and impact of the CRS is known.

Proposal 6: Should all urban populations have access to a kerbside dry recycling collection?

- 64 Should all Councils offer household kerbside recycling services?

We would support urban councils offering household kerbside recycling services, where this is the most effective solution. For example, in a built-up urban environment (inner city) a kerbside service might be inferior to a public drop-off/waste hub or other innovative approach.

A kerbside collection may also not be the best or most efficient form of recycling service for rural areas of the country, especially sparsely populated areas. This is exacerbated by the lack of local infrastructure, the significant distances some councils would have to transport materials to a processing plant, and the ability of ratepayers and levy funds to fund the services, transport and processing costs.

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

Yes, we would support the provision of recycling collection services of some form, not necessarily kerbside collections, to urban population centres of more than 1,000 people, dependent on overcoming the issues raised in Q64 above.

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

The Forum generally agrees with this approach, with the recommendation that the Government consider the efficiency of this approach particularly in rural or sparsely populated areas.

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

We consider that coordinated national and local messaging about recycling services aimed at all sectors of the community is required. In addition, provision of template collection contract specifications to support smaller councils, and financial support to all councils to boost local recycling messaging. There is a large number of research and success stories from other territorial authorities that could be used to market kerbside collection and recycling.

Part Three: 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?

Views across the region were mixed, likely relative to the type of businesses in respective council areas and available supporting infrastructure. Provided the correct support and infrastructure is made available for businesses to divert food waste from landfills, the Forum generally supports this proposal.

We consider there are several ways to address this issue. It would be detrimental to the environment, and to efforts to reduce carbon, to undertake a collection service over a large geographical area and transport the material collected to Christchurch for composting, when using the food waste locally for animal feed and encouraging the use of composting and wormeries would be more suited to a rural district. It would also be a costly service to provide in a number of rural areas due to the small rating base of the districts.

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

Generally the Forum agrees with this approach, noting that it could be specifically applied to only businesses producing or selling food.

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

The Forum agrees that it should be phased in, should the government determine that this proposal should proceed. Mandating a service (say by 2030) will ensure investment is made in suitable technology. Allowance needs to be made for deferral of collections if a required processing site is not operational by implementation deadline.

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

For smaller businesses and those not producing food a longer lead-in time will be fairer due to the cost implications, which could be significant and detrimental to them. Also for those not producing food, an assessment should be undertaken to establish the volumes they will have and the level of service they will require.

It is important to note that consenting facilities is a very long process that is difficult and expensive. This will mean there will be very little competition in some regions, which would expose businesses, including councils, to higher disposal prices than if there were alternative facilities available.

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

All waste generators need to be responsible for the separation and management of food waste they produce. Guidance and support may be required for not for profit and charitable organisations that may not have suitable budget to accommodate additional costs.

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

Key supports we suggest are set out below:

- a) clear mandate requirements, publicly listed reprocessing facilities, and collection companies – ensure details are available to businesses
- b) education programme and supporting resources e.g. resources such as posters or material to display showing what can be collected
- c) support for working with food redistribution organisations and food recovery services
- d) financial support is likely to be required by many to assist with collection costs and provision of receptacles for the storage of food waste between collections. This includes support for smaller and more remote councils which do not have many businesses to service, a small but geographically spread-out ratepayer base, and a small number of staff to support the additional workload. For such areas, the requirement to provide such a service will be financially detrimental. Many will also need actual support to implement systems and train their staff.