



10 December 2021

Via Website

Dear Sir / Madam,

FEEDBACK ON THE NEW ZEALAND WASTE STRATEGY

Thank you for providing the Queenstown Lakes District Council (QLDC) with the opportunity to present feedback in relation to the New Zealand Waste Strategy: Taking responsibility for our waste.

QLDC supports the need for a Waste Strategy grounded in Te Tiriti o Waitangi that supports an accelerated shift to a circular economy. A Strategy that influences wide-spread, systems focused change is much needed to safeguard the living systems that the planet and people depend on. Immediate focus is needed to implement long-term waste prevention solutions that design out waste and establish zero waste as a precursor to achieving circularity.

QLDC has several points of clarification and recommendations to expand upon the current work to ensure the new Strategy and proposed legislative changes meet the needs of local communities now and into the future.

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 the strategy, legislation and Action and Investment plans (AIP).

This submission outlines key points and 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. It should be noted that due to the timeline of the process, this submission will be ratified by full council retrospectively at the next council meeting.

Yours sincerely,



Jim Boulton
Mayor



Mike Theelen
Chief Executive

FEEDBACK ON THE NEW ZEALAND WASTE STRATEGY

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.
- 1.2 With continued growth and the consumption of goods, services and building at an all-time high in the district, 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.
- 1.4 Queenstown lakes District Council (QLDC) also strongly supports the content of the submissions made by the Zero Waste Network, Taituara and the WasteMINZ Territorial Authority Officers Forum.

2. ZERO WASTE, TE TIRITI O WAITANGI AND A FOCUS ON EQUITY WILL HIGHLIGHT THE ECONOMIC, SOCIAL, CULTURAL AND ENVIRONMENTAL WELLBEING CO-BENEFITS THAT ARE ACHIEVED FROM A TRANSITION TO A CIRCULAR ECONOMY.

- 2.1 QLDC recommends maintaining zero waste as part of the strategy's vision and principles. The zero-waste movement, thanks in part to clear and measurable goals, has been a gateway for the community to understand the wider story of resource depletion, consumption emissions, climate change, and biodiversity loss. Circular economy is a relatively new concept for most people, so inclusion of zero waste in the vision statement will help build a connection between reducing waste, reducing emissions, and creating a circular economy.
- 2.2 QLDC's current Waste Minimisation and Management Plan (WMMP) has the goal of moving towards 'zero waste and a sustainable district'. Council and community partner Wanaka Wastebusters has collaborated and communicated under the banner of zero waste to help the community realise the impact of behaviour choices for over 20 years.
- 2.3 The waste hierarchy in the Strategy needs greater definition with actions against each tier to map where the investment and effort is targeted. The distribution of levers, tools, policies etc. need to ensure efforts are concentrated at the top of the hierarchy. There is a disconnect between the vision and principles and the remainder of the strategy. The vision and principles are very ambitious, but the Strategy focuses on the lower end of the waste hierarchy rather than the top end. Explicitly addressing over-consumption and consumer behaviour with actions and targets will help redress this imbalance. The Government must be prepared to address advertising and import legislation. It must also be prepared to review trade agreements if they prevent the designing out of waste, pollution, emissions, and unnecessary use of materials.
- 2.4 The Waste Strategy and Waste Minimisation Act review should be grounded in Te Tiriti o Waitangi and represent the responsibilities, rights, and obligations of all parties to Te Tiriti. Further developments of the plan, for example, action investment planning should include iwi/Māori as partners in order to give effect to Te Tiriti o Waitangi. A strategy aligned with Te Ao Māori will help identify benefits and opportunities across the whole system.

- 2.5 The strategy needs to include a focus on equitable access to learning, infrastructure, and services across rural and urban areas. Areas with problems such as distance from market, low ratepayer base, constrained funding, or high visitor numbers such as QLDC¹, will require increased support.
- 2.6 The strategy should address the issue of primary and secondary microplastics. Microplastic pollution is a waste issue that can only be dealt with at the point of product design. The Government should consider how it can use import and land use legislation to prevent the creation of products that readily shed microplastics. It is recommended that the Panel considers the Royal Society's Report "*Plastics in the Environment – Te Ao Hurihuri – The Changing World*"²

3. SIGNIFICANT INVESTMENT IS REQUIRED IN MASSIVE-SCALE BEHAVIOUR CHANGE AND SYSTEMS THINKING

- 3.1 QLDC supports the proposal to develop a waste-focused behaviour change fund as recommended in the Emissions Reduction Plan.
- 3.2 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.
- 3.3 A focus on full system change is needed to effect behavioural change and government leadership will be central to success. Support for behaviour change should be deep, ambitious, and far-reaching. It is vital that the Government does not underestimate the investment required in this space. It is critical that investment in behavioural change capacity-building has significant reach including public sector, businesses, and producers, who, through their actions, can change the behaviour of visitors and citizens. This could include identifying commitments needed by the public sector in adopting zero waste, circular economy, and social procurement as its approach to supply of goods and services. This would support identifying the co-benefits so that they can be aligned with strategic goals (outside of direct waste outcomes), further enabling outcome driven contracts.
- 3.4 Investment should prioritise innovative and leading organisations such as Para Kore, Zero Waste Network, Enviroschools or NZ Food Waste Champions 12.3 as examples to extend the reach of existing behaviour change programmes.
- 3.5 Formal education and training in trade skills and academic environments need to adopt circular economy, zero waste thinking into their curricula. Training pathways for the trades, engineers, planners, hospitality workers and health care for example, should include zero waste and circular economy concepts as part of their programmes. Immediate attention must be applied to this approach to support a shift towards full systemic change.

¹ <https://www.qldc.govt.nz/community/population-and-demand>

² Plastics in the Environment, Royal Society <https://www.royalsociety.org.nz/what-we-do/our-expert-advice/all-expert-advice-papers/plastics-in-the-environment-evidence-summary/>

4. WHOLE-OF-GOVERNMENT APPROACH

- 4.1 Joining things up and identifying the accountabilities will help build the circular economy and should be explicitly included within the Strategy. There is limited information in the Strategy on who is responsible for future programmes, policy development or accountability. QLDC recommends that the relationship between and responsibilities of this Strategy and other plans such as the Emissions Reduction Plan, the Infrastructure Strategy, the Building Act, and the Plastics Action Plan is made clear and accountable.
- 4.2 QLDC strongly supports greater collaboration with the Social Enterprise Sector to amplify the circular economy movement. The Impact Initiative project led by the Department of Internal Affairs and Ākina identified the role social enterprise can play in solving government, business, and community challenges. Fifteen key recommendations were identified in the final report³. QLDC supports the recommendations as significant enablers to achieve a circular economy and provide solutions to these complex and connected challenges.
- 4.3 There is opportunity across the Resource Management Reform process to develop national environmental standards for landfill management and monitoring. In addition, there is a significant reform programme planned for Local Government. The Strategy and legislation should ensure there is enough flexibility to respond to any changes that may come about as a result of the Future for Local Government review to improve the wellbeing of New Zealand communities and the environment, and actively embody the Treaty partnership.
- 4.4 Local Authorities play a significant role in the provision of services and infrastructure for waste management and minimisation. It would be helpful if the Strategy could more clearly identify the responsibilities and expectations for Local Government.
- 4.5 The suggestion that a stand-alone Crown entity be created to support the scale and breadth of future activity and need for sustained long-term focus is strongly supported. QLDC recommends that the new legislation clearly sets out who is responsible for each function under a new regulatory framework. The establishment of a stand-alone entity dedicated to zero waste and the circular economy with responsibilities to co-ordinate, support, fund and collaborate will help fast track progress towards the Strategy's goals.

³ <https://www.theimpactinitiative.org.nz/publications/roadmap-for-impact>

ANNEX A: NZ WASTE STRATEGY SUBMISSION

1. Do you think changes are needed in how Aotearoa New Zealand manages its waste?

Yes, we need rapid transformation, not only in how we think about and manage waste, but also through embedding a legislative architecture for zero waste and the circular economy that upholds a holistic, te Tiriti-based approach.

2. Do you support tackling our waste problems by moving towards a circular economy?

Yes, alongside the circular economy approach we need to incorporate zero waste principles and a te Tiriti based framework so that we tackle issues from a holistic perspective that supports all wellbeing outcomes. The strategy and supporting work programmes must ensure a circular economy approach is comprehensive and prevents manufacturers from cherry picking profitable material streams and leaving problematic materials to Councils and community groups. The focus needs to be on implementing long-term waste prevention solutions that design out waste with zero waste as a precursor to achieving circularity.

3. Do you support the proposed vision?

The draft strategy has been developed for the past, present, and future people and ecosystems of Aotearoa and as such the vision should reflect the commitment to a te ao Māori approach. The vision and principles have a duty to include zero waste and reflect the significant commitment and progress that community members, Councils, businesses, and organisations have made towards zero waste as a set of values. As well as zero waste the vision and principles should demonstrate a commitment to low-emission solutions, and the expected co-benefits of achieving these outcomes. Aiming for waste reduction outcomes that maximise co-benefits, for example, wellbeing, social justice, job creation, resilience, human health, and equity, should be a driving purpose of the legislation.

4. Do you support the six core principles, or would you make changes?

The principles should reference zero waste and the co-benefits of working towards zero waste including social wellbeing outcomes such as: public health, food resilience, biodiversity, job creation and social impact. These wider outcomes are understood and consequently fostered, when a holistic, te ao Māori systems thinking approach is applied to the problem.

*We support Principle 1 but would suggest rewording bullet point one as follows “Operate as far up the waste hierarchy as possible. Cut out waste, pollution, **primary microplastics, products that readily shed microplastics**, and unnecessary use at the source, as products are designed and produced.*

Principle 3 should include “protect” as well as “regenerate” natural systems.

Principle 3 should include a bullet point statement to “Avoid creating or importing products that contain primary microplastics or that readily shed secondary microplastics”.

Principle 5 should reference te ao Māori as an inherent holistic system thinking approach.

5. Do you support the proposed approach of three broad stages between now and 2050, and the suggested timing and priorities for what to focus on at each stage?

No. The proposed stages need to be implemented at a greater rate of urgency. To support a more rapid approach the establishment of a stand-alone Crown entity dedicated to zero waste and a circular economy must be put together as a priority to research, coordinate and lead the investments and actions.

6. Looking at the priorities and suggested headline actions for stage one, which do you think are the most important?

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 food is crucial and can be used from small scale community food growing initiatives through to large scale agriculture practices in our primary sector.

Investment in services and infrastructure must be considered wider than household generated food scraps and garden waste and must include solutions for animal manure, forestry biomass, biosolids and timber.

The development of a hierarchy of organic waste management and a comprehensive framework for reduction of and beneficial reuse of organic wastes is much needed.

Linking the organic materials sector more clearly with the agricultural sector and incentivising a shift to regenerative farming practices should be included in the organics action and investment planning.

With the key objectives of reducing landfill emissions and benefitting local soils, QLDC's WMMP has prioritised organics diversion from landfill as its next key action. The council are undertaking an options analysis to divert organic materials from landfill. Assessing the market demand from the horticulture, viticulture and agriculture sector for quality soil amendments has been challenging to undertake. It would be beneficial to have support from central government agencies in leading these conversations and driving markets for organic outputs. Collaboration across the region to provide shared facilities to process organics material and maximise benefits is underway with an Otago Mayoral Forum lead project.

Construction and Demolition waste should also be addressed as a priority. The Building for Climate Change programme, Building Act 2004 and Resource Management Act need to include the environmental regulatory tools and controls to greatly reduce construction and demolition waste.

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. Timber was the second largest component, comprising 24.3% of the total weight. Rubble was the third largest component, comprising 13.0% of the total weight. Targeted financial support for solutions that address these materials could reduce waste in the Queenstown Lakes by over 50%.

7. What else should we be doing in stage one?

The roles and responsibilities across Government need urgent attention to ensure rapid progress. New Zealand needs a stand-alone, independent agency dedicated to circular economy, resource efficiency and zero waste to fast track progress. Establishing a new agency will give Aotearoa a fresh, more holistic, and connected approach to achieve the QLDC vision and will also provide an opportunity to build an agency with a Te Tiriti-compliant governance structure from the get-go. There is such a large volume of work that cannot be implemented by the Ministry team alone. The establishment of an agency to lead some of the functions independent of the Ministry is a successful model overseas for example WRAP in the UK and Zero Waste Scotland.

The agency's board must contain a broad base of skills and expertise that are well aligned with the Principles to ensure a holistic and connected approach to waste minimisation and management.

QLDC supports mechanisms to fast-track progress towards zero waste and a circular economy and suggests that the independent agency model be established as a priority.

Stage one should also include the introduction of standard product labelling such as the Australasian Recycling Label (ARL) scheme and regulate producers for greater transparency of environmental impacts by providing information on products.

8. What are the barriers or roadblocks to achieving the stage one actions, and how can we address them?

Establishing an independent entity to coordinate the players and act as a one stop shop would help reduce some of the inefficiencies currently experienced. QLDC have relied on numerous NGOs including WasteMINZ and the Zero Waste Network to access research, learning and promotional resources, network opportunities and guidelines for example.

Political cycles disrupt and can weaken progress towards strategic goals. Establishing an independent body would help reduce any deviation from course.

To achieve a circular economy, a cross government department approach will be required. MBIE and MfE will need to work more closely to address the system as a whole instead of MBIE focussing on throughput of materials via exports and imports and MfE focussing on the fallout of these materials as waste or recycling.

Trade and import agreements must ensure environmental harm will not come of product use. Products identified as creating harm to the environment where alternatives are available should be phased out. Bans on materials such as plastic bags have been successful in not only reducing harm but also inciting change for better outcomes across wider environmental issues.

There is significant infrastructure shortfall across the recovery sector. The Action and Investment planning process must include a collaborative approach to work with Councils in providing equitable access to infrastructure services such as organics processing, modern MRF systems and resource recovery facilities.

A lack of recognition of the important role of the community and social enterprise sector has stifled progress. These organisations often operate on the smell of an oily rag with no certainty

of funding. Barriers should be removed so that greater trust and investment in solutions provided by community for community are rapidly enabled.

New Zealand must urgently work towards bolder use of existing regulatory tools and economic instruments such as the mandatory product stewardship regulatory approach.

9. Do the strategic targets listed in Table 1 focus on the right areas?

QLDC supports strong targets not just for households but also for the commercial sector.

Additional targets should be developed for phase one that are not dependent on baseline data. For example: number of product stewardship schemes adopted, number of reuse systems established, recycled content and reuse of materials. This will ensure greater progress and innovation in the first phase.

10. Where in the suggested ranges do you think each target should sit, to strike a good balance between ambition and achievability?

QLDC supports highly ambitious targets to move towards zero waste.

11. Do you think new legislation should require the government to have a waste strategy and periodically update it?

Yes. We support a statutory requirement to co-develop a waste strategy and respective Action and Investment Plans (AIP) on a periodical basis. The Strategy and AIP framework should be developed collaboratively by the Crown and Māori, with Local Government, Industry and NGO representatives engaged through targeted consultation in the early stages.

12. How often should a strategy be reviewed?

During the first ten-year period the strategy needs to be reviewed every five years. This timeframe could be increased if we see progress and greater stability in the solutions being effective. The Action and Investment Plans (AIP) should be developed every two to three years and have enough flexibility in their framework design to respond to the evolving waste space.

13. How strongly should the strategy (and supporting Action and Investment plans) influence local authority plans and actions?

The strategy should influence but not control local authority plans and actions to ensure locally appropriate solutions and community engagement and influence occur. Local Government should have the flexibility to work with their community to respond to local issues and opportunities within the framework of strong national direction. There is significant disparity across New Zealand in infrastructure and services not as a result of aspiration but as a result of disparity in funding and resources which is then exacerbated by the tyranny of distance and economies of scale.

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 solutions should be supported for local solutions for these communities.

Having a national strategy and an action and planning investment process should not replace or justify removing Waste Management and Minimisation Plans. Local authorities should retain place-based documents (Waste Minimisation and Management Plan), plans and actions, which are tailored for their own communities.

14. What public reporting on waste by central and local government would you like to see?
Reporting measures demonstrating progress across all the principles of the strategy need to be developed. This would mean greater accountability towards action and investment higher up the waste hierarchy. Reporting should not be left to government agencies alone but should include all waste generators. Without this information, NZ will not move towards a circular economy.

A centrally managed portal must be established to remove the inefficient administration burden currently experienced by Councils. For example, the majority of materials are handled as waste and recycling by a very small number of companies. These operators need to be licensed and regulated to provide data to the central agency.

Measurements of activity and impact across all the different levels of the waste hierarchy should be adopted and shared widely so that progress at the top of the hierarchy can be monitored. Focusing on just recycling and landfill data doesn't encourage innovation or greater levels of activity at the top of the hierarchy.

Reporting on the use of levy revenue across the different levels of the waste hierarchy and the impact achieved will help support actions at the top of the hierarchy.

15. Do you agree with the suggested functions for central government agencies?

Central government needs to provide the national strategic direction and action investment plans so that Councils, communities, and the business sector can plan and respond accordingly. The strategy and plans must be established by government with Māori to uphold Te Tiriti responsibilities.

A whole of government approach needs to be fostered so that New Zealand's produce, services, infrastructure, and society can be recognised as leading on a national and international level.

16. What central government agencies would you like to see carry out these functions?

New Zealand needs a clear framework identifying responsibilities and roles for reducing waste. As suggested in the draft Strategy, QLDC strongly supports a new independent entity dedicated to the circular economy, resource efficiency and zero waste to share some of the functions due to the breadth and scale of activity proposed. Establishing the agency will also provide an opportunity for a Te Tiriti compliant approach and should be funded from the waste disposal levy. The agency could coordinate with all entities working towards the Waste Strategy's goals including MBIE, the EPA and the MfE.

The Energy Efficiency and Conservation Authority and the Climate Change Commission are examples of similar organisation in other sectors. Funding should be ring fenced to ensure that learning and education programmes continue to be available as a long-term function of the agency.

17. How should independent, expert advice on waste be provided to the government?

Independent expert advice should continue to be sought from an expanded Waste Advisory Board.

18. How could the legislation provide for Māori participation in the new advice and decision-making systems for waste?

Māori should be a leading partner of the independent agency established to co-ordinate zero waste and circular economy activity. A Te Tiriti responsible and appropriate response would be to consult with iwi on how they would participate and contribute to the legislation.

19. What are your views on local government roles in the waste system, in particular the balance between local and regional? Who should be responsible for planning, service delivery, regulatory activities like licensing, and enforcement of the different obligations created?

A regional approach to plan for and invest in services and infrastructure needs to be adopted. Under the framework of the AIPS, Regional Councils could support and coordinate the process with respective Local Councils.

The independent agency should have the statutory responsibility for operating the duty of care and licensing systems.

20. Do you see benefit in adapting the United Kingdom's duty-of-care model for Aotearoa New Zealand's waste legislation, supported by appropriate offences and penalties?

The duty of care approach should be more comprehensive than currently proposed and focus at the point of design of all products and services. The Duty of Care approach should be extended to include source separation of materials. We support a duty of care model that ensures anyone who produces, imports, keeps, stores, transports, treats, or disposes of waste must ensure that waste is managed properly alongside effective enforcement provisions and efforts to prevent the creation of waste. While the UK model may be applicable in New Zealand, it is important that any model adopted incorporates concepts and practices from mātauranga Māori so that the resulting output is that is distinctly designed for Aotearoa.

21. Do you support strengthening obligations around litter by creating an individual 'duty of care' to dispose of waste appropriately?

The brands and businesses behind the most common littered items need to come into the duty of care approach so that our environment does not continue to be degraded by contaminants on land or entering waterways. Producers should be held fully responsible for the associated clean-up costs currently funded by Councils. The proposed approach however has focussed heavily on litter and illegal dumping already causing a nuisance in the environment when focus at the top of the waste hierarchy is of greater priority. The phasing out of products such as

single use items that are often found in the environment should be progressed as a priority over litter compliance.

Positive behaviour change programmes with a te ao Māori focus, in association with a package of regulatory measures that focus on addressing waste reduction would be a more effective way to reduce litter than investing in enforcement. It is also important to address the large proportion of litter found in the environment that has not resulted from individual behaviour. For example, a large portion of marine plastics is made up from the commercial fishing industry and netting.

The duty of care approach should be comprehensive enough to include those operating farm dumps. This would be a great start to bring unlicensed landfills into a managed environment with a view to phase out farm dumps.

22. What else could we do so that litter is taken more seriously as a form of pollution?

Introduce mechanisms such as container return schemes or retailer/producer take-back schemes which can drastically reduce litter and enable the recovery of more products from public spaces.

23. Do you support a nationwide licensing regime for the waste sector?

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

Nationally consistent, legally binding regulation administered by the independent agency will help reduce repetition costs and ensure political cycles do not affect compliance. To ensure all services meet certain standards and data is available to establish the NZ circular economy a licensing system is fundamental.

24. Should the new legislation include a power to require a tracing system to be developed for some or all types of waste?

A tracing system for all materials is necessary for a duty of care approach and to enable a circular economy. Requiring a tracing system will improve data and enable mapping of material flows, which is crucial for the transition to a circular system.

25. What aspects of the proposals for regulating the waste sector could be extended to apply to hazardous waste?

QLDC supports extending regulation for hazardous waste through the new waste legislation, combined with the reform of the RMA, HSNO Act and Imports and Exports (Restrictions) Act. Hazardous wastes need to be handled through product stewardship schemes if the waste cannot be avoided. Tracing systems would ensure hazardous materials built within products are also tracked. Tracing should link to handling guidelines and regulations including MSDS sheets.

QLDC supports new rules for import and export of climate change inducing gases such as HFCs. QLDC supports the phase out of these gases over the coming years. Products in containing

HFCs such as cooling units and refrigerators are still subject to inadequate end of life recovery to ensure safe disposal of HFCs. A product stewardship scheme approach should be adopted to establish suitable infrastructure, recycling systems and training so that HFCs are collected and responsibly destroyed.

26. Should the new legislation keep an option for accreditation of voluntary product stewardship schemes?

An immediate focus should be on the development of mandatory product stewardships schemes that are co-developed and independently monitored. An effective mandatory model could easily be applied to future voluntary schemes. Existing voluntary schemes have resulted in conveying a false impression or providing misleading information about how a company's products are more environmentally sound.

27. How could the accreditation process for new product stewardship schemes be strengthened?

Mandatory product stewardship schemes should be managed by a new independent agency and be supported by a portion of levy funds during the co-design phase. A clear schedule of the timing for each of the nominated products is necessary to signal stakeholder engagement and action.

The Strategy needs to focus more attention on establishing product stewardship schemes that bring about re-design, repairability and reuse.

A framework aligned with the strategy needs to be developed to determine which products are chosen for schemes, the targets and outcomes of the schemes and the various responsibilities across the whole of the products life cycle.

28. How else could we improve the regulatory framework for product stewardship?

Provide seed funding for the design process and ensure a wider stakeholder group including TA representatives participate in the development.

Establish independent monitoring and enforcement of product stewardship schemes.

29. What improvements could be made to the existing regulatory powers under section 23 of the Waste Management Act 2008?

Existing regulatory tools in the Act should remain and be used. New powers and binding targets should also be established to improve the repairability and durability and increase recycled content of products. Regulatory powers should include requirements to better inform purchasing decisions by consumers.

30. What new regulatory powers for products and materials would be useful to help Aotearoa move towards a circular economy?

QLDC strongly support the inclusion more powers that encourage circular economy behaviours towards the top of the waste hierarchy, such as redesign and rethinking of systems of production and use. QLDC would like to see more of their 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 council rates.

QLDC fully supports the establishment of the container return scheme 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.

31. Would you like to see a right to return packaging to the relevant business?

QLDC supports a 'right to return' approach to packaging which needs to be implemented alongside the appropriate supporting mechanisms including deposits to incentivise return.

32. Would you like to see more legal requirements to support products lasting longer and being able to be repaired?

Legal requirements for more durable and repairable products are key to addressing the problem from the top of the hierarchy and should be a top priority within the Strategy. Policies and tools should be applied as a matter of priority to a broad selection of products. Product stewardship schemes should include interventions to promote and enable repairability and durability over recycling. Access and equity to repair need to be considered in the development of any right to repair provisions.

33. Community-based repair hubs are becoming increasingly popular in the Queenstown Lakes district but are reliant on volunteers. Funding to establish and foster repair initiatives should be made available and provide training for future employment opportunities in this sector. Is there a need to strengthen and make better use of import and export controls to support waste minimisation and circular economy goals? For example, should we look at ways to prohibit exports of materials like low-value plastics?

QLDC supports strengthening import and export controls to comply with relevant mandatory product stewardship schemes. Controls should also be put in place to prohibit both import and export of low value plastics.

34. What types of activities should potentially be subject to a levy? Should the levy be able to be imposed on final disposal activities other than landfills (such as waste to energy)?

All disposal activities including waste to energy should be levied to ensure investment is available for and directed to activities towards the top of the hierarchy. Variable levy rates should be adopted based on the type of material and the potential harm it can cause. QLDC supports variable levies to provide funding for services and infrastructure and drive behaviour change.

35. What factors should be considered when setting levy rates?

A significant and progressive increase and expansion of the landfill levy should be set so that the services, systems, and infrastructure can be established to achieve the Waste Strategy's goals. Increase the waste levy much higher by 2030 to match international best practice and to signal change to industry so that re-design can begin now.

36. How could the rules on collection and payment of the waste levy be improved?

Standard methods for measuring, recording, and reporting on waste quantities and types would improve the collection and payments associated with the waste levy

37. What should waste levy revenue be able to be spent on?

The levy should be allocated according to the waste hierarchy with more focus at the top of the hierarchy. The levy should fund the independent agency driving NZ towards a circular economy and zero waste.

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.

Funds should be made available to rapidly support infrastructure that not only reduces waste but significantly reduces emissions. Many Councils are at a point of considering services to collect organic waste material but are constrained by funding in their next Ten Year Plans due to Covid. Accessing levy funds to support organic waste processing would see progress to divert organic waste from landfill in the early stages of phase 1.

The funds should be available for new community led learning opportunities and existing national programmes that support behaviour change such as Love Food Hate Waste, Repair Cafes, Plastic Free July, and Recycle Week. The system for allocating levy funds must be more easily accessible for community led projects.

The levy should also support the co-design of mandatory product stewardship schemes for priority products. The Action and Investment Planning process should prioritise and direct the remaining investment to meet the Strategy's goals.

The levy should also support training in trade skills and academic environments needs to adopt circular economy, zero waste thinking into their curriculum. This will help integrate the thinking into the system.

38. How should revenue from the waste levy be allocated to best reflect the roles and responsibilities of the different layers of government in relation to waste, and to maximise effectiveness?

Fund the independent agency driving NZ towards a circular economy and zero waste to maximise effectiveness of the remainder of the funds against the objectives of low waste and low carbon circular economy.

39. How should waste levy revenue be allocated between territorial authorities?

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 for example due to high visitor numbers. A focus on initiatives which help reach NZ's emissions reduction goals should be prioritised.

40. Which elements of compliance, monitoring and enforcement should be the responsibility of which parts of government (central government, regional councils, territorial authorities) under new waste legislation?

Further information on the scope of these activities, and the funding mechanisms before this question can be answered. Flexibility to allow for future shifts in responsibility will be important in view of Resource Management Act reform and the Future for Local Government Review.

41. The need for enforcement work will increase under the new legislation. How should it be funded?

Sufficient funding will be required to ensure compliance, monitoring and enforcement is accomplished.

42. What expanded investigation powers, offences and penalties should be included in new waste legislation?

Uncontrolled, and unregulated activities such as farm dumps and burning of inorganic waste should be controlled uniformly across all regions. Legislating offences and penalties for these harmful activities, will provide the power to enforce with appropriate penalties.

42. What regulatory or other changes would help better manage inappropriate disposal of materials (that is, littering and fly-tipping)?

A regulatory approach that focuses upstream and holds responsible those who manufacture commonly littered items will reduce problematic litter items such as single-use plastics. Phase-outs and eventual bans should be signalled to problematic items.