

Making the critical transition to a low-waste society

Submission on Te kawē i te haepapa para – Taking responsibility for our waste

December 2021



Submission of Taituarā to the Ministry for the Environment regarding Te kawe i te haepapa para – Taking responsibility for our waste

*Ki te kahore he whakakitenga ka ngaro te iwi.
Without foresight or vision the people will be lost.*

What is Taituarā?

Taituarā thanks the Ministry for the Environment (the Ministry) for the opportunity to submit on Te kawe i te haepapa para – Taking responsibility for our waste.

Taituarā (formerly the NZ Society of Local Government Managers) is an incorporated society of almost 1000 members¹ drawn from local government Chief Executives, senior managers, and council staff with significant policy or operational responsibilities. We are an apolitical organisation. Our contribution lies in our wealth of knowledge of the local government sector and of the technical, practical, and managerial implications of legislation.

Our vision is:

Professional local government management, leading staff and enabling communities to shape their future.

Our primary role is to help local authorities perform their roles and responsibilities as effectively and efficiently as possible to achieve community wellbeing.

Summary

Taituarā strongly supports the framing, the overall direction and the principles underlying Te kawe i te haepapa para – Taking responsibility for our waste.

¹ As of 31 October 2021.

Taituarā has identified the ‘Transition to a Low Waste Society’ as one of the five critical 21st century transitions and is supporting the local government sector to navigate this transition. We think the strategy should take a three horizons approach to waste ensuring the actions we take today address all three-time horizons simultaneously.

We think more could be done in stage one to address issues further up the waste hierarchy and that an accelerated programme is desirable.

We strongly support a duty of care model, enhanced producer responsibility and better data and information to inform future decisions.

Local government has a role in helping drive and support change in local communities. Across the motu there are various arrangements across councils to support behaviour change, the delivery of services, investment and the provision of infrastructure. We would therefore welcome further conversations with MfE in 2022 about the roles and functions of local, regional and central government that draw on the lessons we can learn from the current waste management and minimisation activities and efforts of councils.

Support for the direction and approach

There is good alignment between the goals outlined in Te kawē i te haepapa para and the future state outlined in Taituarā’s 2019 report, [Navigating Critical 21st Century Transitions](#), which identifies the ‘Transition to a Low Waste Society’ as one of the five critical 21st century transitions.

We need to move from our current high waste society to a low waste society and Taituarā has noted that this requires us to rethink every aspect of our approach. Our work illustrates that we need not just to recover resources at the end of their use rather than disposing of them, but also to only use resources in the first place in ways that will ensure they don’t generate waste. We need to change our mental models, systems and incentives so we minimise waste creation in our production and distribution processes, have high public awareness of waste choices and have clear responsibilities for end of use recovery and treatment activities (and associated costs), and low-waste pathways that are easy for the public to access.

Taituarā has previously identified the following shifts in assumptions and system characteristics needed to transition from our current high waste society to the low waste society that will improve human and environmental wellbeing:

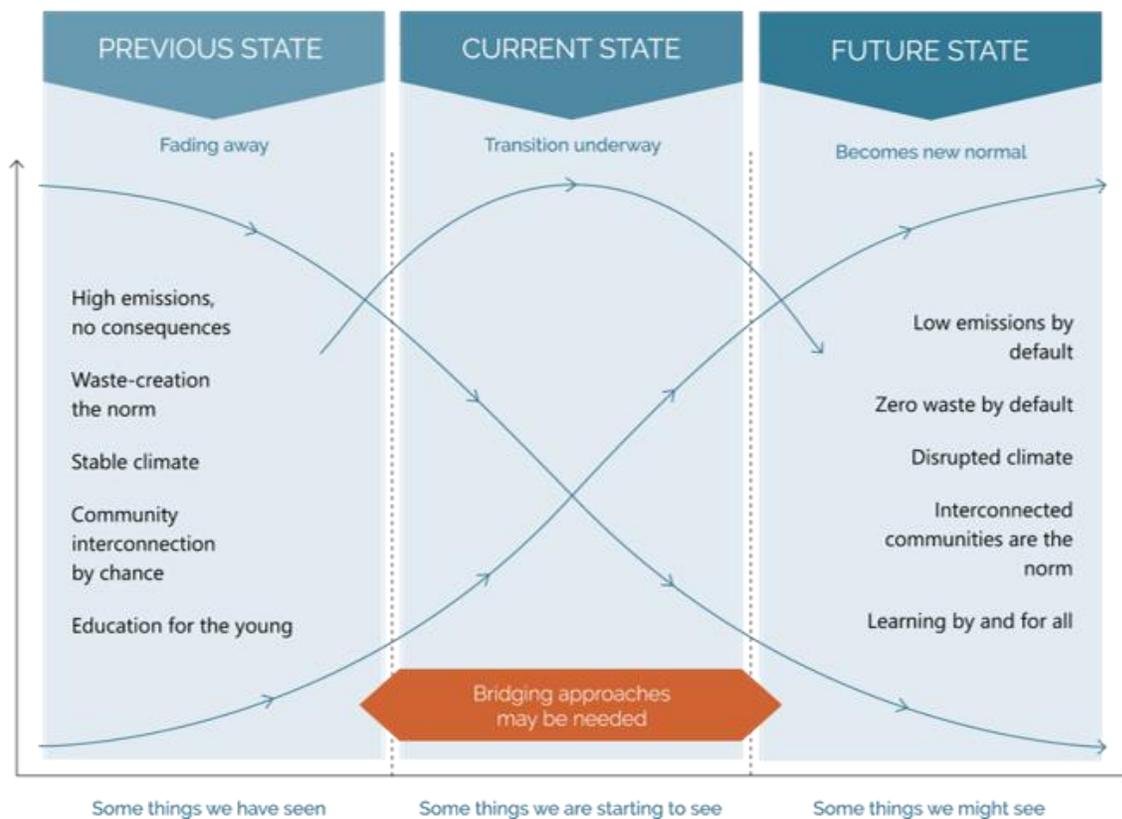
Assumptions	
From	To
<ul style="list-style-type: none"> • Producers have no responsibilities for waste generated by their product post point of sale • Waste doesn't matter as it 'disappears' • My waste is not my problem • Disposal is socially acceptable • Some things can't be recycled/aren't worth recycling 	<ul style="list-style-type: none"> • Producers are responsible for the full life-cycle of what they produce • Waste is an unnecessary burden for all of us and the environment • I am responsible for my waste • Disposal is regarded as antisocial • Everything can and should be recycled
System Characteristics	
From	To
<ul style="list-style-type: none"> • No incentives and systems for product stewardship • No or low costs of disposal for public • Limited capacity to monitor waste behaviours • Limited powers to enforce waste behaviours 	<ul style="list-style-type: none"> • Product stewardship the norm • Recycling is free or remunerative • Unnecessary disposal -where recycling is possible - is costly • Technology-supported monitoring of waste behaviours • Powers to enforce waste behaviours commensurate with impact of waste
Some things we have seen	Some things we may see
From	To
<ul style="list-style-type: none"> • Space and cost pressure on landfill operations • Consumer choice driven by price, convenience and quality • Packaging as a fundamental form of branding • No checks on imports in relation to waste impacts 	<ul style="list-style-type: none"> • Landfills no longer exist – nothing to put in them • Consumer choice driven by waste considerations first, then price, quality and convenience • The decoupling of branding and packaging • Everything that enters the country has to have a sustainable path for its life-cycle as a condition of its entry

Given this alignment between Taituarā's framework for era-scale transition and MfE's proposed strategy, Taituarā supports both the direction and the approach outlined in Te kawē i te haepapa para.

Discussions with the sector about the Transition to a Low Waste Society suggested that there needed to be more emphasis on transition towards higher levels in the waste

hierarchy, especially rethink/redesign, reduce and reuse/repurpose. Local government is not in control of most of the systems that can effect change at these levels. We particularly support the actions outlined in Te kawē i te haepapa para that apply to these higher levels and think that more assertive action could be taken sooner to start the process of system change.

We acknowledge that the consultation document maps out a three-stage journey, but it presents these as a linear path. We think it would be useful if this document explicitly adopted a 3 Horizons approach.



3 Horizons thinking is focused on actions we can take in the present in relation to all three-time horizons simultaneously.

- When we think about Horizon 1, we are thinking about acting today to maximise impact in current conditions.
- When we think about Horizon 2, we are thinking about acting today to position well for changing conditions, for what's coming.
- When we think about Horizon 3, we are thinking about acting today to shape the future environment as it is evolving.

Explicitly using a 3 Horizons framework provides:

- clarity about the state we need to move towards (Horizon 3)
- helps to manage the risk (intensified by the need to move faster) of getting locked into interim solutions (Horizon 2 solutions) that are better than current practice, but then prevent us getting to Horizon 3 (called H2- solutions)
- puts a focus on solutions that will act as stepping stones to H3 (H2+). At the very least it helps us to see that where potential H2- actions are the best short term fix and that we see them specifically as transitional and have exit strategies as an up-front part of the planning. For example, investing in more kerbside recycling is an H2- measure if waste is going to be designed out in H3. Another example is waste to energy. While there is MfE guidance, the strategy should also articulate the strategic approach to these technologies and whether they are part of the medium and long term future as we transition to a circular economy.

We think it would be a useful addition to the report to summarise actions at each level of the waste hierarchy in a Three Horizons framework. This would give a much clearer picture of:

- i. how effort is distributed across the different levels (providing the opportunity to make sure most effort goes into transition at the upper levels) and
- ii. where there is an opportunity to move faster.

It is also useful to note that the work of making transitions needs funding and resourcing – both creating the new systems and structures needed AND the actual processes of change. In particular we under-resource the process of change. Resourcing this needs to be an integral part of any thinking about a ‘just transition’.

Responses to the Questions and Recommendations:

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

Yes.

Taituarā supports the need for era-scale, fundamental change in how Aotearoa New Zealand manages its waste. Our current ‘take, make, dispose’ system is costly, degrades the environment, undermines wellbeing and is ultimately unsustainable. We need to move to an approach that designs waste out prior to production as well as designing out waste in production and rewarding resource recovery.

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

Yes.

We need new models with fundamentally different underlying assumptions. The current rate of resource consumption is not sustainable for the planet. The assumptions and values on which circular economies are based support not only a transition to the low waste society, but also:

- reduce GHG emissions and other forms of pollution
- over time reduce risks of living in a disrupted climate (as there is less waste at risk of polluting the environment due to extreme weather events),
- create the opportunity for more interconnections across communities as we deal with resources in a whole of system frame and
- empower societies to learn how to operate in a more sustainable way.

A circular economy approach is therefore aligned with and supports the critical 21st Century transitions we need to make.

Parts of the circular economy are present, but these tend to be bespoke and of comparatively very small scale. The challenge is how to move these to scale and how to integrate them into (or replace aspects of) the present economy.

On that note, the underlying principles of circular economy are already a significant part of Te Ao Māori and there may be an opportunity to develop a unique Aotearoa New Zealand term and understanding of the “circular economy”, potentially based on kaitiakitanga.

3. Do you support the proposed vision?

Yes. It reflects a fundamental shift in thinking about resource use, waste and our responsibility to the environment.

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

Yes. They are all critical to both the fundamental system change we need to make in relation waste for future well-being and for making the transition in ways that reduce rather than exacerbate inequity.

Procurement as a key tool to tackling the generation of waste should be included.

More problematic is the disconnect between the vision and principles and the remainder of the strategy. The strategy itself focuses on the lower end of the waste hierarchy rather than the top end.

We note there is some duplication and overlap between them and that explicit recognition of Te Tiriti o Waitangi and its principles are absent. Incorporating the principles of partnership, protection and participation in the strategy and as part of the operating models could enable Māori to shape the transition to a circular economy.

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?

The three broad stages appear linear and do not reflect the Three Horizon approach we have taken to our Critical Transition work (described earlier). Ideally, we should be moving faster and working on building the systems and stepping stones required in phase one that make it easy to do the right thing and enable the circular economy. The process outlined suggests we are waiting to have the system working well at the bottom end of the waste hierarchy before we put pressure on turning of the tap at the top end. However different streams could move through different stages in different timescales. It would be helpful to clarify which actions address which parts of the hierarchy in each of the stages.

Options and solutions need to be developed early, for example supporting and investing in systems that incorporate regeneration from the start could be done from now, as could establishing optimised solutions for resource recovery. Stage 1 should include the roll out of mandatory product stewardship schemes that align with the higher part of the waste hierarchy.

The current lack of options “up” the waste hierarchy limits what people can do and therefore the effectiveness of education programmes, which should be targeted at changing behaviour.

We should also be developing exit strategies for short term transitional fixes during stage 1 and not leaving this thinking until later stages.

Stages 2 and 3 should prioritise unsustainable consumption. Reducing consumption will take time and needs to start early.

Resourcing the change process as well as the initiatives themselves needs to be built into all three stages.

Recommendations

- a. Taituarā requests that a Three Horizons approach to the journey is taken, identifying actions at each level of the waste hierarchy in a Three Horizons framework.*
- b. Adequate resourcing for the process of change.*

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

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

All of the priorities are important. It is a question of sequencing and ensuring the priorities are mutually reinforcing.

That said, priority 1 – is the most important “put in place the foundations for transformational change – building the underlying systems”. These underlying systems need to clearly define the roles and responsibilities, including funding and delivery and address the root of the problem - a linear economy. Getting the legislation, licensing systems for the waste sector and duty-of-care obligations for households, businesses and others established, including increased responsibility on producers, manufacturers, retailers and industry, is therefore a priority.

Previous waste legislation was not fully implemented, at least in part due to lack of resources. It is therefore important that there is adequate resourcing for the work to revise and implement the new legislation, framework and the levers within if we are not to repeat history.

We note that the private sector is likely to invest under Priority 2 if the policy and legislative settings are in place that support innovation and change. Clear signals about future regulatory actions and economic instruments will enable change and need to take account of the planning, investment and consenting timeframes involved. Direct investment may be best targeted to the gaps. For example, rural New Zealand is not well served in terms of cost effective, user-friendly waste and recycling services. Instead, the rural sector faces high waste and recycling costs for example from higher transport costs and lower levels of access to services when compared with urban New Zealand.

Priority 3 should be recast in terms of enabling behaviour change rather than education. While there has been success with education, we also need to change our consumptive attitude and behaviour. Until people have better options available to them they are unable to act. Therefore more investment in the other priorities early, such as resource

recovery and recycling systems, may achieve better outcomes, avoid confusion and frustration. of being the 'consumer generation'. We therefore recommend that a broader world view of the changes that are needed is taken.

Priority 6 currently focuses on landfill and contaminated land.

A clear plan, legal responsibility for remediation and funding needs to be put in place for proactive management of closed landfills and other contaminated sites, especially those in coastal erosion zones or in flooding areas.

One of the most significant issues is the high cost of remediation and management and critical failures result in exponentially increasing costs and long-term impacts that compound to the point where they could never be sustained by the local community. Despite this funding from the Waste Minimisation Fund and the Contaminated Site Remediation Fund is not forthcoming and new thinking and new solutions are needed.

We also need to start addressing current and future damage from microplastics and endocrine disrupting chemicals.

Recommendations: What else?

- a. Need the new legislation and the central agency to oversee it within 2-3 years***
 - b. Need to clearly define "waste" and use it consistently***
 - c. Whole of government approach to the circular economy should be explicitly included***
 - d. Set expectations for increasing the landfill level beyond 2024 to encourage investment in alternatives***
 - e. Creating a National Environmental Standard for Disposal to Land***
 - f. Increase efforts to reduce Construction & Demolition (C&D) waste given the significant waste contribution this sector makes***
 - g. Create a resource recovery standard***
 - h. Standards of durability should be applied***
 - i. Generators of waste should bear the cost of disposal of their products through mechanisms such as product stewardship and extended producer responsibility***
- Provide incentives (not "consider providing them") to improve products and packaging – designing out issues***
 - All packaging should come with producer responsibility to collect, process and dispose***
 - Next priority products should be included***

- **Take steps to address microplastics and endocrine disrupting chemicals**
- j. Consider increasing GST on products that are undesirable from the point of the waste hierarchy to incentivise circularity.**
- k. Reuse systems should be prioritised**
- l. Contestable fund / innovation funding**
- m. Exit strategies -**
 - **Recycling systems should be established with the view that certain materials, such as plastic, degrade over time and should be reduced.**
 - **If there was a container deposit/return scheme for glass bottles, then councils wouldn't need to invest in glass recycling infrastructure where it isn't economically viable.**
 - **We need to avoid incentivising feedstock production in Stage 1 for activities that we don't want to see in Horizon / Stage 3.**

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

The WMA 2008 already contains powers to regulate and ban products and materials that could incentivise reusables and push our economy to circularity. During its lifetime mandatory product stewardship schemes have not been put in place and while the bans on microbeads and plastic bags have occurred, the powers under section 23 have not fully been realised. The barriers to achieving progress that have existed for the past decade or so will need to be addressed. As above, resourcing within MfE has undoubtedly contributed to the lack of progress. Adequate resourcing (financial, human, etc), funding, political will and an all of government and system approach will be required.

It will also be important to move from the prevailing culture and practice of voluntary agreements with industry, partnerships, and best-practice guidance to a combination of policy tools that include regulation and economic instruments.

It will be critical to make the legislative changes as quickly as possible. However, there is a very busy policy and legislative reform programme ahead, which could be a significant barrier to making progress in a timely fashion.

In addition, ambitious waste targets have been set in the absence of baseline data and measurement systems so there should be a greater emphasis on establishing baseline

data and an expectation that as we get better information that it is likely that recorded volumes will grow before they reduce.

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

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

We support the development and deployment of well designed targets to enable progress, or the lack of it, to be measured. Well designed targets are a challenge because of the lack of baseline data and there is little information in the consultation document to enable readers to assess whether these targets are appropriate. We would like to see more information on the existing baselines for each sector and how these targets are being calculated. However, we appreciate the need to set targets despite not having this data and we need to move into the next stage even if we don't meet the first stage targets.

Given the lack of alternatives currently, meeting household targets by 2030 will be challenging. The consultation document notes that recycling systems are more advanced for households which means that diversion is already happening. There is probably more scope for businesses to improve their performance. For example, in reducing the amount of construction and demolition waste going to landfill.

Interim targets would enable progress to be measured over the course of stage 1. As above with better recording it is likely that recorded waste volumes will grow before they reduce.

It would be useful to include an explanation of what waste is covered by "households", "businesses" etc. and potentially setting targets for different business and commercial sectors such as Construction and Demolition, Hospitality, and Primary Industries. Similarly, "litter" could be broken down to differentiate between illegal dumping and lower-level littering.

Public sector leadership from the government would suggest that the public sector target should be higher (than the targets for other groups) for reducing waste.

Giving each of the priority areas targets or performance indicators would enable Government to assess whether the headline actions were achieving the priority aims. Other targets could include:

- % of the waste stream that is covered by an Extended Producer Responsibility scheme
- % of packaging waste that is not recyclable or compostable.

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

Yes. The waste strategy should align with circular economy principles and emphasise actions and investment at the top of the waste hierarchy. It will be necessary to update it.

12. How often should a strategy be reviewed?

We suggest that a full review should occur (at least) **every 10 years and potentially at six yearly** intervals to tie in with the six yearly production of Waste Management and Minimisation Plans. Ideally the review of the strategy would occur the year before the Plan review and tie in with the three yearly AIPs.

Given where we are starting from and the timeframes for investment decisions, consenting and construction etc it will be important to given sufficient time for change and measurement to occur.

This should not limit the potential for a review, however, if the trends on key performance indicators move in the wrong direction for successive years.

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

Central government strategy and supporting action and investment plans and local authority plans and actions should align. The strategy should influence but not control local authority plans and actions to ensure locally appropriate solutions and community engagement and influence occur.

Key infrastructure should be planned nationally. We would appreciate seeing an example of what an AIP would look like and whose actions and investments it would cover as neither central nor local government controls most of the investments that are made in waste. Partnerships with the private sector are required.

We don't support rolling the Waste Management and Minimisation Plans into Long Term Plans. Some councils already work collaboratively on combined Waste Management and Minimisation Plans to collaboratively achieve higher quality and more efficient services for waste and recycling, including increased waste minimisation (e.g. the Wellington Region, with its regional, sub-regional – Wairarapa – and individual territorial authority action plans). Councils then include the relevant aspects of those plans within their individual Long Term Plans. It is therefore not clear that removing the requirement for a Waste Management and Minimisation Plan will streamline requirements, clearly communicate future action, achieve better engagement or lead to better outcomes.

In addition, with the reform of three waters, resource management and the review of the Future for Local Government, the nature and requirements around future Long Term Plans may change.

It would however be desirable to enable interim WMMPs to achieve national/regional alignment without doing the full special consultative procedure set out in section 83 of the Local Government Act 2002.

14. What public reporting on waste by central and local government would you like to see?

The proposed waste data reporting is broadly acceptable and where possible the data should be broken down by sector, type and quantity to enable how to minimise waste and what methods of diversion to target. Information on product stewardship schemes should also be reported on.

Industry reporting is also required and while commercial sensitivity is an issue it is important that the data and information influences national and regional policy and planning and transboundary waste movement information is shared.

A consistent methodology should be used.

**15. Do you agree with the suggested functions for central government agencies?
16. What central government agencies would you like to see carry out these functions?**

While the devil is in the detail, the suggested central agency functions look broadly correct.

We specifically support licencing and tracking at the national level for consistency, efficiency and better data collection; waste and operators move throughout the country.

Spending priorities for the levy should be transparent and publicly consulted on and it would be helpful to understand what specifically the consultation document is proposing to change. There is room for improvement in the current Waste Minimisation Fund application and decision making process, which is complicated, slow and disjointed.

Given the lack of progress on waste minimisation to date, the creation of a separate entity (or potentially building new responsibilities into other entities such as the Environmental Protection Agency) has some attraction. Some functions such as licensing, duty of care, producer responsibility, enforcement, monitoring, data collection, and reporting would fit well together in an entity and there are examples around the world that could be used to model it on.

Such an entity would need to be established in the next two to three years, with sufficient resources, skills and expertise to enable it to perform its functions. More detail is needed to be able to assess this further.

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

We recommend a new body or expanding the Waste Advisory Board to include local government, iwi, community/on the ground zero waste experience, research and industry representatives as an initial step during stage one.

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?

Local government has a critical role in helping drive and support change in local communities.

In asking the question about the balance of roles however, the consultation document does not attempt to address the situation for unitary authorities and contains no analysis of the current examples of regions and subregions working together to prevent waste and to plan, coordinate investment and jointly deliver services. These situations should be investigated as part of determining the future allocation of roles and responsibilities and considered as part of the whole system, where potentially some functions (such as licensing, duty of care, producer responsibility, enforcement, monitoring, data collection, and reporting) could sit with a national entity.

If new functions are allocated to regional councils then consideration of how these functions should be funded, including allocations from the waste levy, will be necessary.

While we support standardisation, stronger or clearer statements requiring local authorities to provide collection and recycling services and disposal facilities (either directly or through contracted providers) need to be considered in light of the infrastructure and funding challenges that exist and the opportunities extended product stewardship and the greater use of economic instruments and increased levies and taxes could provide. The reality is that in small, rural, and or remote communities it is not currently economically feasible.

Taituarā would like to work with MfE during 2022 on getting the balance of roles and funding right before new legislation is introduced.

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?

Yes.

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.

A kaitiaki model could be appropriate for Aotearoa New Zealand's context.

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

Yes, it follows from the introduction of a duty of care model. However its practical effect is questionable and we encourage stronger interventions further up the waste hierarchy.

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

There are a range of activities such as creating waste stories (sharing research and evidence about the harm) that could work. However, looking at who is creating the product in the first place and putting responsibility there is in line with the waste hierarchy. Therefore if the issue is packaging or cigarette butts then targeting the manufacturing and taxation of these products to encourage the problem to be designed out may accelerate the elimination of the pollution (alongside any attempts to change individual behaviours).

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

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

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

Yes to the above questions. National systems will be efficient. All the proposed extensions to regulate hazardous waste appear sensible. The system must be appropriately resourced to enable ongoing monitoring and compliance, ie the risk of being caught must be a deterrent and the penalties for non-compliance must be higher than the cost of treatment to discourage dumping.

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

We ask the Government to focus on mandatory product stewardship schemes and extended producer responsibility.

Mandatory schemes are useful and effective where there is a good body of knowledge and well-tested best practice for stewardship that moves up the waste hierarchy and mandatory schemes will be critical to achieving the circular economy.

There are ample examples of mandatory product schemes operating overseas that we can draw on and it would be better to focus public and private sector effort on making progress on the priority list of products and extending that list - matching the existing level of expertise and effectiveness for product stewardship to future compulsion.

Voluntary schemes have not been successful to date but can still exist where learning and experimentation is needed. Accreditation of these schemes and public investment should not be a priority.

The process for becoming part of a mandatory scheme should be simplified.

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

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

Improving the system for product stewardship should draw on the ample experience of overseas jurisdictions. The key to successful product stewardship programs (whether they are mandatory or voluntary) is to provide the appropriate incentives to everyone. E.g. incentives to manufacturers to design out waste, to achieve compliance (including appropriate penalties / fines), to consumers to return products and reduce disposal etc.

Independent third-party verification of proposed schemes, an independent agency that oversees product stewardship, an emphasis on the waste hierarchy throughout the framework, eco-modulation (incentivising more environmentally friendly materials) would all be beneficial.

29. -

30. -

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

Yes. Whether it is taken up will depend on the material, whether infrastructure is available, practicality, convenience and cost for consumers (which should be nil). There should also be a process whereby businesses also fund the collection, transport and processing of packaging that is returned to Transfer Stations or collected from the kerbside.

A comprehensive Container Return Scheme should be implemented for beverage containers.

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

Yes.

33. 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?

Yes there is a need. Everything that enters the country should have a sustainable path for its life-cycle as a condition of its entry. Economic instruments (levies, taxation etc) and producer responsibility schemes should also be considered.

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 final disposals and residual waste (including energy waste) should be subject to a levy. This would incentivise activities further up the waste hierarchy.

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

The significance and risks posed by the waste stream.

The actual cost of alternatives such as recovering and recycling material.

Alternative options for management of materials destined for landfill must be available (recycling, composting, etc) for the landfill levies to work as effective incentives.

36. -

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

Activities across the waste hierarchy, especially initiatives and systems that shift activity up the waste hierarchy and minimise harm should qualify.

Given the six yearly cycle of WMMPs some flexibility to channel funding towards new initiatives, monitoring and enforcement would be welcomed.

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?

If there are new roles or activities allocated to local government (whether regional or local) then the levy should be available to help fund those activities. It should also be allocated to address environmental risks relating to contamination land, hazardous wastes, closed landfills, and climate change as well as supporting monitoring and enforcement programmes.

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

Levy allocation needs to be done in a way that creates co-ordination and co-operation across boundaries, targets need and addresses the challenges faced by small populations servicing large geographic areas or the presence of a high number of non-residents (such as tourists).

Conclusion

Thank you for the opportunity to comment on the Te kawē i te haepapa para – Taking responsibility for our waste.

We strongly support the direction the document is taking. We think there is an opportunity to focus the transition towards higher levels in the waste hierarchy in the first stage of action and accelerate our journey towards a circular economy.

We recommend that the strategy takes a three horizons approach that clearly signals actions we can take in the present that will set us up to shape the future environment and clearly signals exit strategies for the things that won't be part of it.

We recognise that local government has an important role in helping drive and support change in local communities and we would welcome further discussion with MfE during 2022 on the allocation of roles and functions within the waste system to ensure future legislation, activity and resourcing enables Aotearoa New Zealand to achieve this critical waste transition.



Professional excellence in local government

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