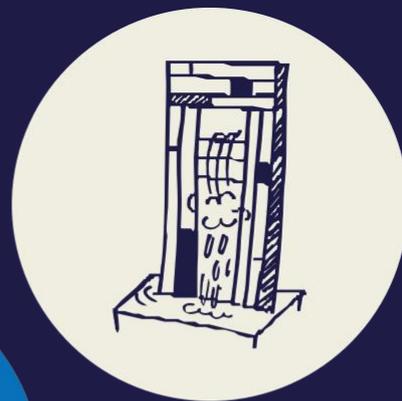


HAMILTON CITY COUNCIL SUBMISSION

Transforming Recycling: Consultation Document (March 2022)

Ministry for the Environment



19 May 2022



**Hamilton
City Council**
Te kaunihera o Kirikiriroa

Improving the Wellbeing of Hamiltonians

Hamilton City Council is focused on improving the wellbeing of Hamiltonians through delivering to our five priorities of shaping:

- **A city that's easy to live in**
- **A city where our people thrive**
- **A central city where our people love to be**
- **A fun city with lots to do**
- **A green city**

The topic of this submission is aligned to the priority **A green city**.

The focus of this priority is to become a sustainable city by challenging the way we grow our city and how we live within our city. To achieve this, we want to continue to minimise our impact on the land by leading the country in waste minimisation practices.

Council Approval and Reference

This submission was approved (under delegated authority) by the Chair and Deputy Chair of Hamilton City Council's Infrastructure Operations Committee (as resolved at the Council's 12 April 2022 Infrastructure Operations Committee meeting).

Hamilton City Council Reference D-4140818 - Submission # 686

Key Messages

1. Hamilton City Council supports the overall direction of the Te panoni i te hangarua, **Transforming Recycling** consultation.
2. We support the need to make recycling more straightforward and less confusing, and in doing so bring New Zealand's recycling systems up to global standards.
3. Hamilton City Council supports the Ministry for the Environment's waste work programme that signals progress towards waste minimisation and the transition to a circular economy in alignment with the waste hierarchy where waste is designed out of the system.
4. We agree that the first step in this system is reducing consumption and prioritising reuse systems and that regionally based refilling stations, alongside the local return depots, would be an opportunity to apply circular thinking while growing local resilience and economy.
5. We support the creation of smaller localised "loops" within a circular economy, where transportation is also reduced in alignment with our need for a low waste and low carbon future.
6. Hamilton City Council would like confidence that the proposals are supported by investment in onshore and local infrastructure for processing of recovered materials - in particular plastics, paper, organics and building materials.
7. Whilst Hamilton City Council overwhelmingly supports the changes that are proposed, there are concerns over the timelines set out in the consultation and how these changes will be funded.
8. Hamilton City Council observes that it is not clear how implementation will mesh with the existing processes of territorial authorities (TAs), such as Long Term Plan budgeting and community consultation, and requests that clarity be given in respect to local government policies and processes.
9. We believe that an innovative, comprehensive, national education campaign across multiple platforms must be designed and delivered in collaboration with TAs to achieve the greatest buy-in and changes in behaviour.

Introduction

10. Hamilton City Council appreciates the opportunity to make a submission on the Ministry for the Environment's **Transforming Recycling** consultation.
11. We see an incredible opportunity ahead where real systems level change that could address the past and present issues of pollution, climate change and biodiversity loss. We applaud the Ministry's work so far in contributing positively to setting us on the right course, including banning microbeads, plastic bags and increasing the waste levy. We tautoko the ambition to have a completely circular economy by 2050.
12. Hamilton City Council supports all decision-making to refer to the waste hierarchy to guide decisions. This includes establishing mechanisms to reduce consumption and establish highly functioning reuse systems as a top priority.
13. We agree that implementing product stewardship is necessary to shift our system which places local government as 'the ambulance at the bottom of the cliff' toward a more sustainable producer responsible model. A Container Return Scheme (CRS) is a positive step towards this.
14. Hamilton City Council is a long-standing supporter of kerbside food scrap collections, however with this comes the reality of experienced issues and concerns - for example, contamination and end markets.

15. We believe consideration MUST be given to reducing food waste at source and not just moving food waste from a waste disposal to an organic's diversion bin.
16. Simply diverting food from landfill does not support reduction in emissions from up the food production chain.
17. Local government and our ratepayers have a lot to gain or lose depending on how a mandatory CRS, kerbside standardisation, and residential and business food scraps collection systems are designed. We appreciate your time and consideration for our views.

Previous Submissions made on Waste Management

18. Hamilton City Council takes a considerable interest in matters regarding waste management and has made a number of submissions in this space in recent years - for example:
 - Hamilton City council's 16 December 2021 submission the November 2021 consultation document **Proposed Product Stewardship Regulations: Tyres and Large Batteries** – refer [here](#)
 - Hamilton City Council's 10 December 2021 submission to the October 2021 consultation document **Taking Responsibility for our Waste: Proposals for a New Waste Strategy; Issues and Options for new Waste Legislation** – refer [here](#)
 - Hamilton City Council's 4 February 2020 submission to the consultation document - **Reducing Waste: A More Effective Landfill Levy** – refer [here](#)
 - Hamilton City Council's 11 September 2018 submission to the consultation document **Proposed Mandatory Phase Out of Single-Use Plastic Shopping Bags** – refer [here](#)
 - Hamilton City Council's 12 June 2018 submission to the **Litter (Increased Infringement Fee) Amendment Bill** – refer [here](#)
19. All submissions made by Hamilton City Council can be accessed [here](#)

Response to the Consultation Questions: Part 1

20. **1. Do you agree with proposed definition of a beverage?**
21. Yes.
22. **2. Do you agree with the proposed definition of an eligible beverage container?**
23. Yes.
24. **3. Do you support the proposed refund amount of 20 cents?**
25. Yes, with the caveat that flexibility is needed to change the deposit amount to reflect the waste hierarchy and to utilise eco-modulation to incentivise producers to increase the sustainability of their products.
26. **4. How would you like to receive your refunds for containers? Please answer all that are relevant and select your preference. Cash; electronic funds transfer; vouchers (for cash or equivalent value product purchase); donations to local community organisations/charities; access to all options; other.**

27. Hamilton City Council supports that access to all options should be available as different options suit different receiving venues. For example, a medium to large supermarket may prefer to have a Reverse Vending Machine (RVM) that issues a voucher that can be redeemed in store. This may be preferable as an RVM that issues cash would need to be secured and maintained like an ATM. However, it may be more appropriate to issue a cash refund at a community-based reuse centre. Venues should be able to choose which option will suit their location.
28. **5. Do you support the inclusion of variable scheme fees to incentivise more recyclable packaging and, in the future, reusable packaging?**
29. Yes. Hamilton City Council supports the eco-modulation of fees that provide financial incentive/disincentive that will drive product packaging choices to what can more easily and cost efficiently be recycled in New Zealand. Hard to recycle packaging should be phased out.
30. We note that additional accompanying legislation may be required to ensure companies are funnelled into choosing packaging that fits into the CRS and is highly recyclable.
31. **6. Do you agree with the proposed broad scope of beverage container material types to be included in the NZ CRS?**
32. Yes, however we have concerns with the inclusion of liquid paperboard (LPB) and respectfully request that the Ministry reconsiders the inclusion of liquid paperboard and consider other potential options, for example a ban or mandatory product stewardship.
33. Hamilton City Council notes that in Priority 4 of the Draft NZ Waste Strategy, it is proposed that hard-to-recycle and low-value materials are phased out to get resource recovery and recycling systems working well. Liquid paperboard cartons *“are hard to recycle as the container is a composite, multilayer material made from a combination of fibre (cardboard), plastic and aluminium. These materials are not easily separated for recycling”* (this consultation, page 115). Often, they come with a hard plastic spout which needs to be dealt with as well.
34. This consultation also states on page 37 that, *“The NZ CRS should always prioritise container-to-container recycling solutions where possible, including to export markets, if necessary, over downcycling.”* Presently, the only use for LBP is SaveBoard, which is a downcycled material. We don’t know the effects of SaveBoard on the environment, including how this material breaks down and what microplastics and chemicals are released. The destiny of LBP and SaveBoard is ultimately landfill.
35. Territorial Authorities (TAs) are generally supportive of product stewardship schemes because they believe brands should share the burden of the cost of recovering and recycling them rather than the consumer (via CRS) or the ratepayer (via kerbside) But if LPBs are included in kerbside, then this contradicts that and also potentially sends a signal to other packaging brands that if they keep on lobbying councils they may eventually get their wish of having it included in kerbside recycling.
36. Per question 11, we support the analysis that was used to consider a ban on plastics 3 and 6 to see what the outcome of LPB would be.
37. **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.**
38. Glass; plastic (PET, HDPE, PP and recyclable bio-based HDPE and PET); metal (e.g., aluminium, steel, tinplate and bimetals).
39. **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?**

40. Yes, if this is in alignment with the waste hierarchy (for example, as noted above with consideration for LBP) and does not create confusion and contamination in the kerbside bin.
41. The decision-making process must be governed by an independent managing agency and not left to an industry body alone, and each proposed new beverage container type must be assessed on a case-by-case basis. The Forum supports flexibility in the case of a new material or packaging type that can prove itself in terms of circularity and low impact on the environment.
42. **9. Do you agree with the proposal to exempt fresh milk in all packaging types from the NZ CRS?**
43. We agree this should be exempt as there is a high level of recycling of these containers, however we would like to see the dairy industry take responsibility for the cost of their products at end of life through product stewardship – especially as the agriculture sector is such a huge part of New Zealand’s emissions profile (at almost 50%¹). The industry should be doing all that it can to mitigate its emissions and reduce impact on the environment, which includes taking responsibility for its waste. We support additional drivers being established to support reuse systems to put products into reusable (or at a minimum, recyclable) products.
44. **10. Do you support the Ministry investigating how to target the commercial recovery of fresh milk beverage containers through other means?**
45. Yes, as discussed in question 9, if not included in CRS with an eco-modulated cost, then products should be included in priority product stewardship, as well as additional legislation and drivers to support reuse systems.
46. **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?**
47. Yes. The producer needs to cover the cost of recovery. If milk is not included in CRS then any product stewardship scheme needs to take the cost off the council/ratepayer and on to the producer to make the product fully recoverable.
48. **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?**
49. No, Hamilton City Council supports an approach where refillables can opt into the NZ CRS. Excluding refillables is likely to deter refillable schemes, increase single use and confuse the public. Including refillables would allow the burgeoning refillables market to access the return network of the NZ CRS.
50. **13. Should there be a requirement for the proposed NZ CRS to support the New Zealand refillables market (e.g., a refillable target)?**
51. A refillable target should be included in the NZ Waste Strategy rather than the CRS.
52. **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?**
53. Currently, setting up refillable infrastructure will require a greater level of cost than using the existing system to recycle or dispose of single use beverage containers.

¹ <https://environment.govt.nz/guides/agriculture-emissions-climate-change/>

54. While product stewardship aims to shift disposal costs from the consumer/council to the producer, the cost of setting up and running preferable alternative reuse systems may still be cost prohibitive. Therefore, we support the application of eco-modulation applied which increases the cost of recycling (for disposal) over reuse.
55. To help establish reuse systems, we support Government funding (similar to the Plastics Innovation Fund) refillable infrastructure, such as washing facilities through a contestable fund which would enable easy access to these systems throughout New Zealand. We believe this would be a step toward a thriving refillables market - full system change is required to impact behavior change.
56. Nationwide education on why refillables are preferable and how these systems work need to be shared with the business, community, and local government stakeholders.
57. ***15. Are there any other beverage packaging types or products that should be considered for exemption?***
58. No.
59. ***16. Do you agree that the size of eligible beverage containers would be 3 litres or smaller?***
60. No. We also support subjecting the 1% of containers above 3L to some level of regulation, including data reporting.
61. ***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?***
62. No. Best practice has shown that lids off reduces contamination from old food products, notwithstanding the disruption to machinery and operation of MRFs.
63. Hamilton City Council recommends consistent messaging with kerbside collection practice and the many education campaigns citing 'no lids' messaging.
64. ***18. Do you agree that the scheme should provide alternative means to capture and recycle beverage container lids that cannot be put back on the container? If so, how should they be collected?***
65. The MfE needs to investigate and invest in infrastructure which can capture lids, so this material does not go to landfill. The best solution should be applied, whether this is a separate collection system (reverse vending machines could have a dedicated separate slot for lids), bottles required to have an attached lid or changing both the CRS and kerbside together to include lids.
66. ***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?***
67. Yes.
68. ***20. Where would you find it easiest to return eligible beverage containers? Please select all that are relevant and rank these from most preferred.***
- Supermarket.
 - Local retail outlet that sells beverages (e.g., dairy, bottle shop, petrol station).
 - Community recycling/resource recovery centre.
 - Waste transfer station.
 - Shopping centre/mall.

- Commercial recycling facility.
 - Other community hubs (e.g., town halls, sports clubs etc).
69. **21. Retailers that sell beverages are proposed to be regulated as part of the network (mandatory return-to-retail requirements). Should a minimum store size threshold apply? And, if yes, what size of retailer (shop floor) should be subject to mandatory return-to retail requirements?**
- Over 100m² (many smaller dairies likely exempt).
 - Over 200m² (many dairies and some petrol stations likely exempt).
 - Over 300m² (many retailers, dairies, petrol stations and smaller supermarkets likely exempt).
70. **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?**
71. Yes. The threshold should be over 60m² as in Lithuania.
72. **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).**
73. Yes. A framework for exemption could be created. We consider the biggest reason for exemption to be scheme efficiency.
74. **24. Do you agree with the proposed 'deposit financial model' for a NZ CRS?**
75. Yes. Hamilton City Council strongly supports the proposed 'deposit financial model' and encourages behaviours towards the top of the waste hierarchy. This will promote redesign and rethinking of systems of production and use.
76. To support this model, clear guidance and legislation on unredeemed deposits must be developed in consultation with all stakeholders.
77. **25. Do you agree that a NZ CRS would be a not-for-profit, industry-led scheme?**
78. Yes. Hamilton City Council encourages greater representation across all stakeholders. It is important that the scheme is led by an independent agency to ensure the best outcomes for all stakeholders including, but not limited, to councils, community groups and Mana Whenua. We would support greater collaboration with the Social Enterprise Sector to amplify the circular economy movement.
67. **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?**
68. Yes.
69. **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?**
70. Yes. Regular review will be required to ensure targets are realistic and that the scheme is achieving the outcomes intended.
71. **28. Do you support the implementation of a container return scheme for NZ?**
72. Yes. The Local Government Manifesto 2020 outlines a top priority to establish a CRS, with 90% support among local government.

73. In alignment, Hamilton City Council strongly supports the principle of product stewardship as this will enable producers to take more responsibility for the full lifecycle of their products, resulting in a more appropriate distribution of the cost of waste management and recovery of products. Under a well-designed CRS, a recognised mode of product stewardship, the cost of managing beverage containers is placed on those who **produce and consume** the product rather than the wider community. We see numerous other benefits to a CRS for community and job creation. In addition to this, we see the CRS as a benefit to local government as it will reduce litter cost to councils.
74. We request that councils are engaged in the rollout of a CRS to ensure kerbside isn't compromised and consumers aren't confused. Having consistent engagement with local government will ensure there is consistent messaging and faith in both the CRS and kerbside systems.
75. ***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.***
76. Hamilton City Council supports.
77. ***30. If you have any other comments, please write them here.***
78. Until the CRS is rolled out, we are unsure on the effect on councils and on kerbside service. Councils will still be providing services, and it is not certain that a reduction in volume will result in a reduction of cost as routes will still need to be serviced while collecting less product. We are unsure on the implications for contracts, as this will not become clear until CRS is implemented, and contracts are renegotiated.
79. Sufficient funding will be required to ensure compliance, monitoring and enforcement is accomplished. For the scheme to be effective, fair and return maximum benefits to the community, it needs to be comprehensive, equitably designed with all stakeholders and not managed by industry groups.
80. Capacity and capabilities of processing is a challenge that must be considered when implementing the NZ CRS. For example – only half the liquid paperboard sold in New Zealand can be accepted for reprocessing by Tetrapak and Visy has a cap on the amount of recycled glass it can accept. These limitations also provide good logic for why refillables should be included in the scheme from the onset.
81. We have concerns around inconsistencies between CRS and kerbside, for example if unredeemed liquid paperboard ends at MRFs that do not currently process this material, they will need an increase in resources to deal with this.
82. Hamilton City Council supports nationally mandated, standardised product labelling for recyclability and compostability on all packaging such as the Australasian Recycling Label (ARL) scheme.

Part 2: Improvements to Household Kerbside Recycling

83. ***31. Do you agree with the proposal that a standard set of materials should be collected for household recycling at kerbside?***
84. Yes, Hamilton City Council supports greater consistency of services and infrastructure across New Zealand. However, consideration needs to be given to areas that do not have ready access to reprocessors and non-optical sorting MRFs. The standard set of materials must be designed that considers all councils and their accessibility to reliable markets.
85. ***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?***

86. Yes. Standardisation is important to reduce confusion regarding what can and cannot be recycled. It will reduce contamination as consistent messaging will provide clarity and enable people to recycle right.
87. **33. Do you think that national consistency can be achieved through voluntary measures, or is regulation required?**
88. Regulation is required to achieve national consistency and to change our wasteful behaviours. This must be coupled with supporting infrastructure and funding to ensure collection and transportation to reliable markets is accessible for all councils.
89. Regulation will also provide consistent service provision across both council and privately contracted services.
90. **34. Please tick below all the items from the proposed list which you agree should be included in the standard set of materials that can be recycled in household kerbside collections.**
- Glass bottles and jars (with or without jibs on in alignment with the CRS). ✓
 - Paper and cardboard. ✓
 - Pizza boxes (empty). ✓
 - Steel and aluminium tins and cans. ✓
 - Plastic bottles 1 (PET) and 2 (HDPE). ✓
 - Plastic containers and trays 1 (PET) and 2 (HDPE). ✓
 - Plastic containers 5 (PP) = ALL. ✓
91. **35. If you think any of the materials above should be excluded, please explain which ones and why.**
92. Hamilton City Council is concerned that LPB be included for the reasons stated in question 6.
93. **36. If you think any additional materials should be included, please explain which ones and why.**
94. None.
95. **37. Do you agree that the standard set of materials should be regularly reviewed and, provided certain conditions are met, new materials added?**
96. In principle, a 6 or 7 yearly review would be appropriate to assess if materials should be taken out of kerbside. We should be promoting a reduction in recycling in alignment with the waste hierarchy as more reuse systems are supported to be put in place.
97. There should be capability for materials to be removed if markets no longer exist. If having to change messaging and behaviours, councils would need to be supported by additional funding and nationwide campaigns communicating the change.
98. We do not support industry making a new product and then expecting local government to collect it. Rigorous analysis and a watertight case could be also made to add to kerbside. Considerations to accept a material in kerbside are listed in question 38. Regardless of whether the question is to include or exclude an item, local government needs to contribute to the decision-making process as this affects services.
99. **38. What should be considered when determining whether a class of materials should be accepted at kerbside in the future? (Tick all that apply).**
- Sustainable end markets. ✓

- End markets solutions are circular and minimise environmental harm. ✓
- Viable processing technologies. ✓
- Processing by both automated and manual material recovery facilities. ✓
- No adverse effects on local authorities, including financial. ✓
- Supply chains contribute appropriately to recovery and end-of-life solutions for their products. ✓
- Other (please specify): How does this align to the waste hierarchy? How many times can the material be recycled (rather than downcycled?) Why doesn't this come within CRS or have a product stewardship scheme? Does this have local government approval? ✓

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

- The responsible Minister.
- Ministry for the Environment staff in consultation with a reference stakeholder group. ✓
- Existing Waste Advisory Board - define who is in reference stakeholder group to include comments below. ✓
- An independent Board.
- Other (please specify): Local government needs to have a presence on the reference stakeholder group and Waste Advisory Board. This includes representation from both the metro/rural and North/South Islands. Local government, as the stakeholder with legislative mandate to manage kerbside, needs to have a strong presence and the ability to influence the system. We suggest that acceptability across council would need to be 75%. ✓

101. 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.

102. Any new product that is made of the same material as what is accepted in CRS or kerbside but is not accepted should be part of a product stewardship scheme. We want to incentivise people to do the right thing, so this scheme should enable this. However, we maintain that we should shift responsibility from councils and ratepayers to producers and consumers.
103. We believe this should be fully funded outside of local government and criteria required to ensure these sites do not become dumping ground for litter etc.
104. Soft plastics should be available through a network of locations, but this should be covered as part of a product stewardship scheme and local government should not bear this cost.
105. Transfer stations, community resource centres etc are set up to be collection points, but product stewardship should cover the cost of collections and processing the products.

Proposal 2: All Urban Populations Should have Access to Kerbside Food Scraps Collections

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

107. Yes, absolutely. Diverting food and garden waste from landfill will produce environmental, economic, and social benefits locally and nationally.
108. Access to suitable facilities for processing this material is a limiting factor in many parts of New Zealand. In addition to being diverted from landfill, the organics strategy, planning and management

will require secure end markets. This will require significant cross-sector collaboration.

109. **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?**
110. Yes, a weekly food scraps collection has worked well in Hamilton. Any longer than weekly would be undesirable.
111. **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?**
112. Yes.
113. **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?**
114. Yes. Councils should play a role but not necessarily provide a garden waste service.
115. For effective capture of all organic materials, TAs will require Central Government support to provide communication of key issues such as methane emissions, avoidance of contamination from physical and chemical sources, best methods of collection and optimum processing approaches. The most effective way for local government to achieve diversion is for MfE to provide analysis and guidance on best practice, otherwise each council will need to fund and resource the decision-making.
116. As part of standardising kerbside, we support banning 240L rubbish wheelie bins as this increases garden waste disposal to landfill.
117. **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?**
118. Yes, access to suitable facilities is a limiting factor in many parts of New Zealand. If new infrastructure is needed, consideration of funding, consenting, and build times will need to be given. A regional approach to plan for and invest in services and infrastructure needs to be adopted.
119. Investment in services and infrastructure must be considered wider than household and business generated food scraps and garden waste and include solutions for organic materials streams such as animal manure, forestry biomass, biosolids and timber. It is also crucial that sustainable end markets such as regenerative agriculture, are developed.
120. **46. Do you agree that councils with access to suitable existing infrastructure should have until 2025 to deliver food scraps collections?**
121. Yes. If funding support and guidance is provided by Government, then 2025 may provide sufficient time for some Councils with access to existing facilities to establish a food scraps collection. Councils would need to undertake the detailed financial planning in 2023 to be able to consult with their community in their LTP process.
122. **47. Do you agree that councils without existing infrastructure should have until 2030 to deliver food scraps collections?**
123. No, Hamilton City Council does not believe this is enough time.
124. Hamilton City Council fully supports (and has demonstrated) diversion of organic material from landfill, however a lack of infrastructure and funding are limiting factors for any mandated change.

Consideration needs to be given to the cost of collection and infrastructure required and how this is funded. A regional approach to plan for and invest in services and infrastructure needs to be adopted, as in many regions, facilities would not be economically viable due to low volumes of organic materials. Transportation costs to other regions where facilities are located is often prohibitive.

125. Waste Management and Minimisation Plans (WMMPs) will need to be redesigned to incorporate organics diversion with time allocated for planning and community consultation, funding in this LTP has been allocated for and there is no guarantee of securing additional funding through the LTP process.
126. **48. Are there any facilities, in addition to those listed below, that have current capacity and resource consent to take household food scraps? Envirofert – Tuakau • Hampton Downs – Waikato • Mynoke Vermicomposting site – Taupō • Enviro NZ – new facility planned for the Bay of Plenty in 2023 • Living Earth – Christchurch • Timaru Eco Compost Facility – Timaru.**
127. We are aware that EcoGas in Raparoa is almost live.
128. Note: the question number is missing from consultation document.
129. We propose to exclude the following non-food products and any packaging from any kerbside collection bins used to divert food scraps and/or green waste from landfills:
- Kitchen paper towels/hand towels/serviettes.
 - Newspaper and shredded paper.
 - Food-soiled cardboard containers (e.g., pizza boxes).
 - Cardboard and egg cartons.
 - Compostable plastic products and packaging.
 - Compostable fibre products and packaging.
 - Compostable bin liners.
 - Tea bags.
130. However, like some other TAs in New Zealand, Hamilton City Council already accepts some of these items (e.g., tea bags and kitchen paper towels) in the current kerbside food scraps bin. Education would be needed for those items which people are used to putting in food scraps (or other recycling bins) which will not be accepted in the equivalent bin under a new standardised system. Otherwise, people will continue to put these items in the same bin out of habit, but under a new system this would be contamination.
131. **49. Are there any additional materials that should be excluded from kerbside food and garden bins? Please explain which ones and why.**
132. Liquids, animal waste e.g., rabbit hutchings and cat litter should be excluded for health and safety and contamination reasons.
133. **50. For non-food products or packaging to be accepted in a food scraps bin or a food and garden waste bin, what should be taken into consideration? Tick all that apply.**
- Products help divert food waste from landfills.
 - Products meet New Zealand standards for compostability. **Possibly, but we are unclear what standard this refers to - does this mean the Australian standard? Or would we be implementing our own? ✓**

- Products are certified in their final form to ensure they do not pose a risk to soil or human health. **Possibly, but to what standard? ✓**
- Products are clearly labelled so that they can be distinguished from non-compostable products. **Possibly, but we need an easy-to-understand labelling system to distinguish what is commercial or not. Commercial is very different than home compostable, and this is a huge issue for the future of the system. ✓**
- A technology or process is available to easily identify and sort compostable from non-compostable products.
- **Producers and users of the products and packaging contribute to the cost of collecting and processing. ✓**

134. Compostable products are still single use. We support the exclusion of compostable products until there is standardisation with compostables, including a clear labelling system. Compostable products need to provide an end-of-life benefit otherwise they are difficult to accept by processors.

135. *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.*

136. No.

Proposal 3: Reporting on Household Kerbside Collections Offered by the Private Sector

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

138. Yes.

139. *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?*

140. Yes.

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

142. Yes, however we have concerns that if the data is amalgamated, contractors will reduce the apparent performance of councils. Service delivery should not be undermined by poor market performance.

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

144. Yes, other information should be included. This includes the final destination of products: an indication of onshore or offshore processing locations. Declaring a final destination will ensure we can identify stranded assets and ensure we are meeting national targets.

145. Hamilton City Council supports all the data the private sector will report on (as listed on page 85 of this consultation) should be published. We would like to see a calculation of the total waste stream versus material recovered.

146. Hamilton City Council would like to see the kilograms of waste per person tracked over time. This is a better measure of success as this would show consumption reducing.

Proposal 4: Setting Targets (or Performance Standards) for Councils

147. **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)?**
148. Yes, this should apply to both councils and private collectors.
149. **57. Should the minimum performance standard be set at 50 per cent for the diversion of dry recyclables and food scraps?**
150. No. A staged approach is preferable and more realistic. In this staged approach, a high performing system would be 35-40% to start, with a goal of 45% diversion minimum with green waste. Initially, a target could be set based on how councils are currently performing and what opportunity exists.
151. **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?**
152. Hamilton City Council supports a target to be set and then reviewed once everyone has rolled out their service.
153. **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?**
154. Yes, a target should be staged over time to meet high targets with time and include emphasis at the top of the hierarchy.
155. **60. Some overseas jurisdictions aim for diversion rates of 70 per cent. Should New Zealand aspire to achieve a 70 per cent target?**
156. Yes, Hamilton City Council supports ambitious targets with clear timeframes and pathways for all sectors to participate in achieving them. However, significant investment needs to go into reuse systems (such as for nappies to reusable nappies) for the remaining, often challenging parts in the waste stream.
157. Hamilton City Council understands that a win is NOT simply seeing recycling rates going up over time!
158. **61. What should the consequences be for territorial authorities that do not meet minimum performance standards?**
159. Imposing a financial penalty is not reflective of a partnership. Adding financial burden will make it harder for some smaller councils to achieve performance rather than enable success. It is not a level playing field now for smaller and rural councils. This needs to be addressed as a priority. Under performing councils would need an offer of advice and assistance from MfE.

Proposal 5: Should Glass and/or Paper/Cardboard be Collected in Separate Containers?

160. **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?**
161. Yes. Glass separate and/or paper cardboard separate is now a common solution to reduce contamination rates and needs to be mandated.

162. **63. If glass or paper/cardboard is to be collected separately, should implementation begin immediately; wait for any CRS scheme design to be finalized or wait until the impact of a CRS scheme has been observed?**

163. Hamilton City Council agrees with waiting until the impacts of a CRS scheme can be observed.

Proposal 6: Should all Urban Populations have Access to a Kerbside Dry Recycling Collection?

164. **64. Should all Councils offer household kerbside recycling services?**

165. Yes, for urban properties.

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

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

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

169. No, this should be done within four years of now. Being linked to WMMP is confusing as the timelines for these are all different.

170. There is no information in the consultation about how kerbside recycling will interact with rates and the communication to the community. Implementing new services needs to consider what else is planned for councils. Funding needs to accompany these measures to make them viable.

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

172. A full nationwide education programme should be coordinated to each roll out. Funding should be available for service delivery and capitol works.

173. Coordinating research and information gathering would support this work so each council does not have to undertake the same research, projections costs etc. This would enable more consistent decision-making and cross council work.

174. We also see that this is an opportunity to capitalise on our community's commitment to reduce their waste, in order to encourage more climate-positive behaviours. There are many people in our communities who already associate waste minimisation and recycling as a way to live more sustainably and reduce their impact on climate change and the environment, so we could use this as an opportunity to further change their behaviours and shift more people to a lower-carbon lifestyle. MfE research has already shown that around 1 in 3 New Zealanders are worried about climate change, but many show a reluctance to change their behaviours² – at the same time 55% are highly committed to reducing the waste they generate³. If we are able to make the link from waste to climate change

² [https://environment.govt.nz/facts-and-science/science-and-data/understanding-new-zealanders-attitudes-to-the-environment/#:~:text=reduce%20their%20waste-,Climate,so%20\(76%20per%20cent\)](https://environment.govt.nz/facts-and-science/science-and-data/understanding-new-zealanders-attitudes-to-the-environment/#:~:text=reduce%20their%20waste-,Climate,so%20(76%20per%20cent))

³ <https://environment.govt.nz/facts-and-science/waste/research-into-attitudes-to-waste-and-recycling/#:~:text=We%20found%20that%3A,amount%20of%20waste%20they%20generate>

clearer through the initiatives and education that will come out of these proposals, this will help our communities to realise that they are capable of changes and can make a difference, which will in turn encourage other climate-positive behaviours.

Part 3: Separation of Business Food Waste

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

176. Yes. Food loss and waste currently contributes to 8% of global greenhouse gas emissions and reducing this is ranked as the third best global solution in addressing climate change.

177. Furthermore, the onus is often put on individuals to make changes to respond to waste issues and climate change more broadly, when businesses and corporation play a huge role in creating these issues – for example, a recent article found that just 15 companies make up 75% of New Zealand’s emissions profile⁴. We support that businesses should be expected to do all that they can to reduce their emissions, as well as our community, and this includes diverting food waste from landfill.

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

179. Yes, Hamilton City Council supports in principle. However, the definition of a commercial business needs to be outlined. This may include those operating a sole premise for operating business with of over ‘x’ number of employees; those related to organics (restaurants, cafes, horticulture or agriculture etc.); those producing or processing food; schools; hospitals and events etc.

180. It is not clear how the Council service will be required to interact with the proposed business service. Some councils are offering a targeted rate for business kerbside and some are not. This requires clarification.

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

182. Yes. Businesses in areas where suitable infrastructure already exists should be able to divert food waste ahead of those areas where new infrastructure is required to be built. Organics management guidelines and composting standards need to be established to ensure we have consistency across the country.

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

184. No. All businesses should be required to comply, differing lead times would complicate education and enforcement.

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

186. No. All businesses should be required to comply. The Forum recommends prioritising reduction education and capability building first and foremost. Capability must be provided to small businesses who may find organics diversion cost prohibitive. Options such as shared schemes (businesses working together and sharing bins), community compost collectives should be encouraged.

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

188. Access to infrastructure and collections first, information about how the system works to give confidence in the system.

⁴ <https://www.newsroom.co.nz/revealed-new-zealands-worst-climate-polluters>

189. A central government funded education package should include material to help businesses measure food waste and indicate how to reduce this for example campaigns such as Love Food Hate Waste for business.

Further Information and Opportunity to Discuss Our Submission

190. Should the Ministry for the Environment require clarification of the submission from Hamilton City Council, or additional information, please contact **Kirsty Quickfall** (Resource Recovery Advisor), phone 027 686 4446 or email kirsty.quickfall@hcc.govt.nz in the first instance.
191. **Hamilton City Council would welcome the opportunity to discuss the content of our submission in more detail with the Ministry for the Environment.**

Yours faithfully



Lance Vervoort
CHIEF EXECUTIVE

Hamilton City Council
Garden Place, Private Bag 3010, Hamilton

 /HamiltonCityCouncil

 @hamiltoncitycouncil

 07 838 6699

hamilton.govt.nz