

## Submission to the Ministry for the Environment

### *Te panoni i te hangarua: Transforming Recycling Consultation 2022*



18 May 2022

#### **Introduction**

1. The Timaru District Council thanks the Ministry for the Environment for the opportunity to submit on the *Te panoni i te hangarua: Transforming Recycling* consultation document.
2. This submission is made by the Timaru District Council, 2 King George Place, Timaru. The submission has been endorsed by Mayor and Councillors. The contact person for Council is Nigel Bowen, Mayor of the Timaru District, who can be contacted at Timaru District Council, phone (03) 687 7200 or PO Box 522, Timaru 7940.
3. The contact person regarding the submission content is Cath Irvine, Waste Manager, Timaru District Council, who can be contacted via [cath.irvine@timdc.govt.nz](mailto:cath.irvine@timdc.govt.nz).

#### **Recycling in Timaru District**

4. The Timaru District Council is a local authority in the South Island serving over 48,000 people in South Canterbury. The main settlement is Timaru, with other smaller settlements of Geraldine, Pleasant Point and Temuka.
5. Redruth Resource Recovery Park is home to our District's Materials Recovery Facility and Redruth Landfill, a Class One landfill that accepts waste for Timaru, Mackenzie and Waimate Districts.
6. The District also has three Transfer Stations located in the smaller settlements which accept recyclables and waste from local residents and businesses.
7. Timaru District was the first council in New Zealand to implement a kerbside collection service for rubbish, recyclables and organics. Additionally, a new separate glass collection was introduced in July 2021.

#### **The Consultation Document**

8. Timaru District Council is fully supportive of the Ministry's efforts to improve recycling practices through product stewardship. Council looks forward to

working closely with the Ministry to achieve the overarching goals and objectives of the Waste Minimisation Act 2008.

9. Council will respond on the general principles for the three parts of the proposed document in kind.

### **Kaupapa whakahoki ipu: Container Return Scheme**

10. Council agrees with the policy principles the proposed scheme is based on, particularly to reduce beverage container litter and to increase recycling.
11. The proposed containers and materials (including sizes) for inclusion and exclusion are supported. However, Council wishes to highlight the discrepancy with lids on containers being accepted in the CRS but not in the kerbside recycling; this may cause confusion in the public. Council suggests having one option for both schemes to encourage better returns and reduce contamination as stated in the consultation document.
12. Council supports the options available for the public to receive their deposit refunds as it allows for individuals to make the choices to suit their needs; likewise, the 20-cent deposit with the 3-5-cent scheme fee is appropriate and justified based on the rationale provided by the Ministry.
13. The mixed methodology for containers to be returned is recognised as appropriate and suitable for the variety of needs throughout Aotearoa New Zealand and is enabling each community to be involved in the CRS to suit.
14. In regard to mandatory or voluntary participation as a Container Return Facility, Council agrees with the proposal to have mandatory participation at supermarkets in urban areas >1000 people, where over half the drink containers are purchased from. However, Council would like to see the flexibility to allow other businesses or locations to participate voluntarily rather than impose requirements based on square metreage and the managing agency then having to manage an exemptions process.
15. Council fully supports the deposit model as the preferred funding system for the CRS to ensure better outcomes for participation and return rates. Evidence from overseas shows the deposit model having recovery rates of over 90%, whereas refund models have significantly lower return rates (between 58-70%).
16. The proposed managing agency being based on cross-sector representation is appropriate, provided there are very clear terms of reference and strong enforcement measures to manage any conflicts of interests of any of the participating agency representatives. It is appropriate for the Ministry for the Environment to establish the CRS and move into the central regulatory role that the managing agency would report to. Council agrees with the proposed set targets and timelines for the managing agency.

## **Te whakapiki i te hangarua paeara ā-kāinga: Kerbside Standardisation**

17. Council agrees with the overarching ideals to standardise kerbside recycling materials to simplify the system within Aotearoa New Zealand. The proposal to make all household kerbside recycling materials to meet one standard is Council's preferred option.
18. Council wishes to reiterate its concern over the mixed messaging about lids being excluded from the kerbside collections but accepted in the CRS. It would be preferable to have one rule for lids no matter what type of collection, even if it involves investing in infrastructure to support Materials Recovery Facilities to be able to process lids.
19. Council advocates for clear directions on all products labelled as compostable packaging, and to have a standardised approach to handling this throughout the country. We would like to encourage the Ministry take a strong stance towards "greenwashing" on products that are promoted or labelled as compostable when they are in fact not compostable within the existing Aotearoa New Zealand organics processing framework.
20. Council would also like to advocate strongly for a clear labelling system on products to indicate what is recyclable (i.e. a "green tick" or something similar) that is easily identifiable and enables consumers to make informed choices at the point of purchase. This is due to the confusion about reading the different codes on plastic containers so a clear label or logo would be highly effective to help consumers.
21. Timaru District has been collecting organic waste for several years and recognises its advantage in having a local organics processing plant at Redruth. Council advocates that the Ministry consider investment in local infrastructure that could support the expansion of the Redruth organics processing plant to accept organics collection from more councils in the South Island, which would then support the proposal to implement a wider rollout of food scraps collection to all councils. It is important to note that making food scraps kerbside collection compulsory would be more successful if the infrastructure is already in place to accept this waste.
22. Infrastructure development is critical to improve recycling and diversion from landfill. Considering this, Council strongly suggests that the Ministry look at investment into onshore processing facilities for recyclable materials to help combat high emissions from transporting waste to overseas markets. It is critical these facilities are in accessible locations to reduce transport costs and carbon emissions.
23. Council fully supports the proposal to require all private waste collecting companies to comply with annual performance reporting to the Ministry, to better capture the information on waste within Aotearoa New Zealand. Council requests that the collated information is available to local councils to better track solid waste management within their boundaries.

24. Introducing targets for councils to aim for is a good way to try and improve diversion rates within Aotearoa New Zealand. Council supports the principles of target setting, with the caveat that these are phased in over time to enable councils to plan accordingly and incorporate these targets into their KPIs and Waste Minimisation and Management Plans.
25. Enforcement of these targets is a complicated matter and Council recognises that there may be variables out of any local authority's direct control. Therefore, we recommend that if there were to be any financial penalties, they were in the form of percentages of Waste Levy funding withheld through an escalation process. This would translate to having warnings in the first and second instances of failure to meet targets, with the final measure after the third instance being a loss of Waste Levy funding. It would not seem fair to penalise a council on the first instance of failure to meet a target without having the opportunity to improve.
26. Timaru District has recently introduced a separate glass recycling kerbside collection, which has seen a reduction in contamination of the recycling stream. However, Council recognises that not all councils in Aotearoa New Zealand offer a kerbside collection service and feel this is the first logical step before making a separate glass collection compulsory. Additionally, Council feels strongly that each council should have the option to choose the best method to improve its recycling materials, so would prefer the Ministry let councils choose whether to collect glass or paper/cardboard separately, after the implementation of the CRS. Council advocates strongly for the Ministry to invest in local infrastructure to be able to reduce carbon emissions from transport and to ensure there is adequate capacity onshore to reduce the reliance on volatile export markets.
27. Kerbside recycling is one of the best measures to increase diversion from landfill, so Council supports the proposal to make this a standard national practice. However, due to the economic disparities some councils experience (particularly in the North Island), it would be advisable for some sort of support for the implementation of kerbside collections for the remaining councils (means-tested). It is recommended that at least the three-bin system is introduced in those local authorities if the Ministry is going to make food scraps waste collection compulsory, as there is a risk that offering only a recycling bin would see high contamination levels as it is likely that it would become a refuse bin by default.

### **Te whakawehe i ngā para kai ā-pakahi: Separation of Business Food Waste**

28. Council agrees with the proposal to roll out a phased implementation of requiring all businesses over a certain size (i.e. >10 employees) to have sustainable food waste systems in place.
29. Council supports any exemptions from businesses to be related to the proximity of access to organic processing facilities (public or private) and the feasibility of

on-site collection (bokashi bins, worm farms, community food rescue organisations, and/or compost bins) and taken on a case-by-case basis.

30. Council recommends that businesses develop food waste systems to be included as part of the food safety plans that all registered food businesses are required by law to have; all other businesses must have clauses within their tenancy agreements requiring them to have some sort of food waste system suitable to the volume of food waste produced by their business. Recommended support comes in the form of guidance documents on MBIE websites for businesses and provides clear pathways for businesses to access the information.