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Tēnā koutou katoa,

Christchurch City Council submission on *Te panoni I te hangarua: Transforming recycling* discussion document

Christchurch City Council (the Council) thanks the Ministry for the Environment for the opportunity to provide comment on *Te panoni I te hangarua Transforming recycling* discussion document.

Please find attached the consultation questionnaire completed with the Council's responses (**Attachment A**).

Thank you for the opportunity to provide this submission. For any clarification on points within this submission please contact Ross Trotter, Manager Resource Recovery at Ross.Trotter@ccc.govt.nz.

Yours faithfully



Lianne Dalziel
Mayor of Christchurch

Attachment A: Te panoni I te hangarua: Transforming recycling - Technical feedback

Part One: Container Return Scheme

<p>1. Do you agree with the proposed definition of a beverage?</p>	<p>The Council agrees with the proposed definition of a beverage. The inclusion of all beverage types, is consistent with overseas best practice and represents a broad based system which will be easier for the public to understand and therefore support implementation and participation.</p>
<p>2. Do you agree with the proposed definition of an eligible beverage container?</p>	<p>The Council agrees with the proposed definition of an eligible beverage container. The inclusion of all rigid beverage container types is suitable, with separate management and or phasing out of alternative container types (e.g. pouches and bladders). This, combined with potential eco-modulation will support the recovery of recoverable materials for recycling.</p>
<p>3. Do you support the proposed refund amount of 20 cents?</p>	<p>We support the refund amount of 20 cents as this will provide a suitable incentive to encourage participation, without putting too much additional cost on the container at point of sale.</p>
<p>4. How would you like to receive your refunds for containers? Please select all that are relevant and select your preference. All relevant, preference for access to all options</p> <ul style="list-style-type: none"> • cash • electronic funds transfer (eg, through a scheme account or mobile phone app) • vouchers (for cash or equivalent value product purchase) • donations to local community organisations/charities • other (please specify) 	<p>The Council support access to all refund methods proposed in the discussion document. This will enable retailers to provide customers with a reasonable choice for distributing Container Return Scheme (CRS) refunds, including as a payment, deduction from costs or as a form of donation.</p>
<p>5. Do you support the inclusion of variable scheme fees to incentivise more recyclable packaging and, in the future, reusable packaging?</p>	<p>The Council support the inclusion of variable scheme fees as this is better aligned with waste minimisation hierarchy principles.</p> <p>Eco-modulation has a potential role to play in encouraging greater resource efficiency, including incentivising packaging with higher</p>

	recovery value or lower re-uses cost.
6. Do you agree with the proposed scope of beverage container material types to be included in the NZ CRS?	<p>The inclusion of all container materials is necessary in order to encourage consumers to address all beverage container types, not just those that are easy to recycle.</p> <p>In addition, this scope will retain consumer choice and brings in acceptability of disposal/reprocessing costs as part of the costs of the product.</p>
<p>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.</p> <ul style="list-style-type: none"> • glass • plastic (PET 1, HDPE 2, PP 5, and recyclable bio-based HDPE and PET) • metal (eg, aluminium and non-ferrous metals such as steel, tinsplate and bi-metals) • liquid paperboard 	The Council agrees with proposed scope.
8. Do you support a process where alternative beverage container packaging types could be considered on case-by-case basis for inclusion within the NZ CRS?	We support the case-by-case consideration of alternative beverage container packaging types as this will allow for innovation and industry development of alternatives and or any unforeseen impacts of introducing the CRS.
9. Do you agree with the proposal to exempt fresh milk in all packaging types from the NZ CRS?	While we agree that fresh milk be an exemption, we do not support this in all packaging types. Any exemption should be contingent on HDPE containers only (the definition should apply to <i>single resin code clear HDPE</i> only). This will mitigate the migration into alternative packaging including multi-layered fresh milk containers, and would encourage manufacturers to move up the waste hierarchy (for example, by using refillables), noting alternative container types (such as liquid paperboard) would attract a higher eco-modulation fee.

<p>10. Do you support the Ministry investigating how to target the commercial recovery of fresh milk beverage containers through other means?</p>	<p>The Council support further investigation by MfE and believe that recovery of fresh milk needs to either be incentivised (via a CRS) or regulated. Commercial premises could be required to separate recyclable materials, including HDPE containers, which would lead to higher recovery levels of commercial recycling.</p>
<p>11. Do you support the Ministry investigating the option of declaring fresh milk beverage containers made out of plastic (eg, plastic milk bottles and liquid paperboard containers) a priority product and thereby including them within another product-stewardship scheme?</p>	<p>The Council support extended producer responsibility and greater control over the types of containers (e.g. multi layered containers).</p>
<p>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?</p>	<p>The Council agrees that reuse/refill systems should be kept separate from recycling, as this is a different model in the circular economy. Refillables are less likely to need to be collected as recycling or become litter compared to other beverage containers. However, we acknowledge that return fees may also need to be regulated to ensure recovery (re-use) is occurring. In addition, we would support a public education and incentive programme to encourage re-use</p>
<p>13. Should there be a requirement for the proposed NZ CRS to support the New Zealand refillables market (eg, a refillable target)?</p>	<p>While the Council support mandatory reporting requirements for refillables, we do not see a direct linkage between the NZ CRS and the potential refillables targets. Noting it is important that refillables targets address reusable products payback period, including embedded carbon (e.g. number of times re-used), noting that if re-usables are only used once they do not achieve this objective and should be included in a CRS.</p>
<p>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?</p>	<p>Potential incentives to support the uptake of refillable beverage containers and other refillable containers could include:</p> <ul style="list-style-type: none"> • Standardised containers; e.g. reusable single use beer and wine bottles, labelling and promote return network. • Retailer takeback systems (e.g. at home deliveries), with the increasing use of shopping delivery services for essential

	<p>supplies, there could be increased support for beverage supplier companies (e.g. milk man, but perhaps tied in with the online delivery services). Refillable milk containers could be taken back when deliveries are made.</p> <ul style="list-style-type: none"> • Promote refill stations, encouraging refilling as an alternative to single use products.
<p>15. Are there any other beverage packaging types or products that should be considered for exemption?</p>	<p>The Council would support the exemption of medicine packaging.</p>
<p>16. Do you agree that the size of eligible beverages containers would be 3 litres and smaller?</p>	<p>Yes agree, need to have a maximum limit for practicality of scheme, also will encourage consumers to consider larger containers (e.g. for water) than individual bottles, reducing single use behaviours. Consistency with kerbside processing and public messaging.</p>
<p>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?</p>	<p>We do not think consumers should be encouraged to put lids back on their containers, however we support a requirement for a lid return area/receptacle at all return facilities. It is important to ensure that any decision regarding lids supports the reprocessing of containers, as lid and container bodies can have different plastic types, it is important to ensure collection of lids doesn't create additional collection or sorting constraints, and quality impacts (for example if the buyers consider lids as contamination, allowing them to remain on degrades the product.</p> <p>Again, Council reiterates the important of public messaging and education. Generally kerbside recycling requires lids to be off. Additionally, some beverage containers include directions for lids to be removed and recycled separately (for example, the Australian labelled model where each component has direction around its recycling). Our experience has also been that liquid and food is more likely to remain in the container if the lid isn't removed. Ideally these should be collected separately as suggested below.</p>

<p>18. Do you agree that the scheme should provide alternative means to capture and recycle beverage container lids that cannot be put back on containers? If so, how should they be collected?</p>	<p>Yes, as mentioned in the previous question, we support a requirement for a lid return area/receptacle at all return facilities. We suggest a “Slot” for these lids with clear pictures to show this.</p>
<p>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?</p>	<p>The Council support a mixed-return model, including responsibilities for large retailers (supermarkets), opportunities for not for profit and NGO involvement and public drop off facilities (depots).</p> <p>The <i>Transforming recycling</i> consultation document seems to infer takeback will be limited to supermarkets, however it is not clear whether the store size thresholds (Q21-22) relate only to supermarkets or all retail premises that sell beverages.</p>
<p>20. Where would you find it easiest to return eligible beverage containers? Please select all that are relevant and rank these from most preferred to least preferred.</p>	<ol style="list-style-type: none"> 1 Supermarket 2 Local retail outlet that sells beverages (eg, bottle shop, petrol station) 3 Commercial recycling facility (eg, depot, more likely to be located in industrial zone) 4 Waste transfer station 5 Community recycling/resource recovery centre 6 Shopping centre/mall 7 Other community centres/hubs (e.g., town hall, sports club, etc)
<p>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?</p> <p>And if yes, what size of retailer (shop floor) should be subject to mandatory return-to-retail requirements?</p> <ul style="list-style-type: none"> • Over 100m2 (many smaller dairies likely exempt) • Over 200m2 (many dairies and some petrol stations likely exempt) 	<p>We agree a minimum store size threshold should apply and that this should be 300m2 (for supermarkets).</p>

<ul style="list-style-type: none"> Over 300m² (many retailers, dairies, petrol stations and smaller supermarkets likely exempt) 	
<p>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?</p> <p>If yes, what lower size threshold should be applied to rural retailers for them to be required to take back containers?</p> <ul style="list-style-type: none"> Over 60m² (as in Lithuania) 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) 	<p>We agree the shop-floor-size requirements for retailers required to take back beverage containers should differ between rural and urban location and that the threshold should be over 100m². However, recommend this apply to the floor area dedicated to Food and Grocery sales. Otherwise it is perceivable that a large retail premises that happens to also offer the sale of beverages, but not as its core business (for example a rural hardware store bigger than 100m² that sells cold drinks), triggers the limit and therefore may choose not to sell beverages.</p>
<p>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.)</p>	<p>The Council agree that agree that there should be other exemptions for retailer participation, subject to agreement between the parties (that is, neighbouring retailers) and public advertising of nearby location at exempt location.</p> <p>We however note that this could be difficult to administer or advertise – residents would need to understand the system. For example, if some dairies have return and others don't, the labelling needs to be very clear.</p>
<p>24. Do you agree with the proposed 'deposit financial model' for a NZ CRS?</p>	<p>We agree with the agree with the proposed 'deposit financial model' as this creates revenue from unclaimed deposits to cover scheme costs, and ensures scheme prioritises recovery of containers</p>
<p>25. Do you agree with a NZ CRS that would be a not-for-profit, industry-led scheme?</p>	<p>The NZ CRS needs to be not for profit. If industry-led then needs to be 'deposit financial model'.</p>
<p>26. Do you agree with the recovery targets for a NZ CRS of 85 per cent by year 3,</p>	<p>We agree with the recovery targets for a NZ CRS and note that 85% is</p>

and 90 per cent by year 5?	consistent with overseas models and ensures the scheme delivers real change.
27. If the scheme does not meet its recovery targets, do you agree that the scheme design (including the deposit level) should be reviewed and possibly increased?	The Council reiterates the need to ensure recovery targets and rollout of collection facilities are linked to and support achievement of targets, so if the scheme does not meet its recovery targets it should be reviewed.
28. Do you support the implementation of a container return scheme for New Zealand?	We support the implementation of a Container Return Scheme for New Zealand.
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? (eg, the deposit amount, scope of containers, network design, governance model, scheme financial model, etc). Please explain.	The Council asks that MfE progress the proposed CRS without delay.
30. If you have any other comments, please write them here.	Any excess funds held by the Managing Agency should be used for education to further promote a higher recovery rate.

Part Two: Improvements to household kerbside recycling

Proposal 1: Collecting a standard set of materials	
31. Do you agree with the proposal that a standard set of materials should be collected for household recycling at kerbside?	While we agree with the proposal that a standard set of materials should be collected by recycling at kerbside, this could be achieved by setting minimum requirements. This would pull “up” the collection of those who are not collecting all they can, but would not pull “down”

	<p>the potential of the current high performing systems (i.e. encouraging investment and innovation in maximising diversion from landfill).</p> <p>We note that while the Council is very closely aligned to the proposed standards, many councils are no not close at all. Contamination of kerbside recycling is a significant issue and a large part of the confusion is due to mixed messaging of what can be recycled combined with inconsistencies between collection services. The proposed standards would close the gap, reduce contamination improving the current levels of diversion nationally.</p>
<p>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?</p>	<p>We agree that when councils continue to collect material (such as lids, LPB, Plastics #3, #4, #6, #7) and where there is no market, or the material is considered contamination, it sends an impression to the public that this material is being successfully recycled. However, if this is not occurring it can cause confusion and undermine public trust in the recycling system.</p>
<p>33. Do you think that national consistency can be achieved through voluntary measures, or is regulation required?</p>	<p>National consistency will only be achieved with regulation and supported with national recycling labelling (as in Australia) to give the public clear, consistent messaging and the confidence that they are recycling correctly. This would also motivate manufacturers to move towards packaging options that achieve the labelling standards.</p> <p>We support further investigation into requirements for packaging to have clear, standardised labelling in order to make it easier for the public to understand what can and cannot be recycled or composted.</p>
<p>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. All of the materials in this list need to be clean, wording to this effect to be included in any list - resolves the pizza box</p>	<p>The Council supports all proposed items, with the exception of pizza boxes, being included in the standard set of materials that can be recycled in household kerbside collections.</p>

<p>issue re contamination.</p> <ul style="list-style-type: none"> • glass bottles and jars • glass bottles and jars • pizza boxes • 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) 	
<p>35. If you think any of the materials above should be excluded, please explain which ones and why.</p>	<p>Pizza boxes or any other recyclable product should not be singled out for inclusion, as the degree of contamination should drive the decision on whether to include in kerbside recycling or not. Key concerns with the specific inclusion relate to attached contamination (food scraps, grease and mould).</p> <p>Clear messaging is needed for public compliance on recycling contamination. Research into the issue found that across the pizza boxes sampled, 8% contained food.</p> <p>The focus of the proposed list in Q34 includes all clean materials and we recommend that the classification is limited to material that is free of contaminants). Soiled cardboard needs to have an outlet or more waste to landfill will be generated, however and we also recommend paper products be allowed in organics.</p>
<p>36. If you think any additional materials should be included, please explain which ones and why.</p>	<p>RPET and other recycled content standards to be included on the proposed list.</p>
<p>37. Do you agree that the standard set of materials should be regularly reviewed and, provided certain conditions are met, new materials added?</p>	<p>The Council consider it essential that there is a focus on being open to new opportunities. Having a set regular review period (for example 18 months) would ensure this.</p> <p>The body to carry out reviews should be identified at the introduction</p>

	<p>of the scheme, and there should be an application criteria, where producers who can demonstrate suitability for collection and a national demand for an output product can request inclusion in the kerbside list.</p>
<p>38. What should be considered when determining whether a class of materials should be accepted at kerbside in the future? (Tick all that apply)</p> <ul style="list-style-type: none"> • 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 Yes <p>other (please specify)</p>	<ul style="list-style-type: none"> • sustainable end markets • viable processing technologies • supply chains contribute appropriately to recovery and end-of-life solutions for their products • no adverse effects on local authorities, including financial
<p>39. Who should decide how new materials are added to the list?</p> <ul style="list-style-type: none"> • the responsible Minister • Ministry for the Environment staff in consultation with a reference stakeholder group • existing Waste Advisory Board • an independent board <p>other (please specify).</p>	<p>We believe the decision to include new materials should be made by either the existing Waste Advisory Board or an independent board.</p>
<p>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</p>	<p>Yes, a convenient and consistent network of collection facilities would support greater waste diversion and reduce contamination in other</p>

<p>recycle items that cannot easily be recycled kerbside? For example, some items are too large or too small to be collected in kerbside recycling.</p>	<p>collection streams.</p> <p>This approach also provides an opportunity for the regional collection of materials outside of those included in the standard kerbside collection.</p>
<p>Proposal 2: All urban populations should have access to kerbside food scraps collections</p>	
<p>41. Do you agree that food and garden waste should be diverted from landfills?</p>	<p>Food and garden waste should be diverted from landfills to support working towards a low emission circular economy. From a financial perspective, it also costs more to dispose of rubbish than to process organics or recycling.</p>
<p>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?</p>	<p>We agree all councils should offer a weekly kerbside food scraps collection noting that in areas of either high population or low population, alternative collection methodologies may be preferred (i.e. community hubs or transfer station facilities).</p> <p>The Council already offers a weekly kerbside organics collection (food scraps and garden organics) with refuse and recycling collected fortnightly on alternating weeks.</p>
<p>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?</p>	<p>We agree that these collections should be mandatory in urban areas, unless viable alternative collections (as above) exist.</p> <p>We also note there should be flexibility to scale operations and technology appropriately and that collaborative approaches and shared facilities should be considered.</p>
<p>44. Do you think councils should play a role in increasing the diversion of household garden waste from landfills?</p>	<p>We support making it more affordable for people to drop-off green waste at transfer stations, with a cheaper drop off option that is available prior to dropping off waste to landfill. Noting that Garden Organics collected at a Transfer Station can be used to supplement</p>

<p>If so, what are the most effective ways for councils to divert garden waste?</p>	<p>optimal processing of foodscraps collected at kerbside. We also support a combined Food Organics and Garden Organics (FOGO) collection where applicable, noting this has multiple benefits, including convenience for residents, fewer vehicle movements, lower GHG emissions and high rates of participation.</p>
<p>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?</p>	<p>The Council agrees with a phased approach, noting that some systems will take time to be developed, procured and implemented.</p>
<p>46. Do you agree that councils with access to suitable existing infrastructure should have until 2025 to deliver food scraps collections?</p>	<p>We believe this is enough time. It is recommended that councils be required to contract a foodwaste or FOGO collection by 2025, noting scheme rollout may take up to 12 months from that date as suppliers purchase new equipment etc.</p>
<p>47. Do you agree that councils without existing infrastructure should have until 2030 to deliver food scraps collections?</p>	<p>We believe this is enough time, provided investment signals are set in near term. However, we note procurement, planning, consenting and construction/commissioning could easily take a number of years. In addition, we would support consideration of organics facilities being treated as essential infrastructure and eligible for the fast tracked consenting process.</p>

<p>48. Are there any facilities, in addition to those listed below, that have current capacity and resource consent to take household food scraps?</p> <ul style="list-style-type: none"> • 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. • Selwyn Pines Resource Recovery Park <p>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:</p> <ul style="list-style-type: none"> • kitchen paper towels / hand towels / serviettes • newspaper and shredded paper • food-soiled cardboard containers (eg, pizza boxes) • cardboard and egg cartons • compostable plastic products and packaging • compostable fibre products and packaging compostable bin liners • tea bags. 	<p>We do not support exclusion of fibre products</p> <ul style="list-style-type: none"> • kitchen paper towels / hand towels / serviettes • newspaper and shredded paper • food-soiled cardboard containers (eg, pizza boxes) • cardboard and egg cartons <p>We also advocate that Government considers regulatory approaches for difficult materials (e.g. teabags containing plastics), rather than exclude them from composting processes, as the exclusion of these products will result in unnecessary waste to landfill (bag and contained teas leaves). Product stewardship schemes should be in place to manage the recovery of packaging and waste organic materials for both tea and coffee packaging (e.g. coffee pods).</p>
<p>49. Are there any additional materials that should be excluded from kerbside food and garden bins? Please explain which ones and why.</p>	<p>We propose that ash, timber and sawdust are prohibited, in order to reduce arsenic contamination of compost products.</p>
<p>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?</p>	<p>We support this following being taken into consideration for non-food products or packaging to be accepted in a food scraps bin:</p> <ul style="list-style-type: none"> • products help divert food waste from landfills • products are certified in their final form to ensure they do not pose a risk to soil or human health

	<ul style="list-style-type: none"> • producers and users of the products and packaging contribute to the cost of collecting and processing <p>Only if compostable packaging can be identified at collection point, we would also support</p> <ul style="list-style-type: none"> • products meet New Zealand standards for composability • products are clearly labelled so that they can be distinguished from non-compostable products <p>In addition, where technology or process is available to easily identify and sort compostable from non- compostable products, this could also be considered as an approach (although we are not aware that suitable technology currently exists).</p>
<p>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.</p>	<p>The Council currently accepts the items outlined in Q48 in our kerbside food and garden organics collection. The carbon element of these fibre products is beneficial to the optimising the composting process, particularly during seasonal influences of higher grass clippings in spring and the nitrogen this contributes.</p> <ul style="list-style-type: none"> • Kitchen paper towels / hand towels / serviettes and food-soiled cardboard containers (Prevents contamination of recycling if placed in kerbside recycling system) • Shredded paper – Along with paper smaller than an envelope, as these materials cannot be processed at our current recycling facility. • Compostable fibre products and packaging should be accepted as long as un-lined (e.g. paper-based food containers, wood-based containers and cutlery).

	Existing processing operations, which allow fibre products in our kerbside collections has resulted in certified organic outputs and high quality compost with an established demand. Unnecessary exclusion of fibre products would negatively result in more waste to landfill.
Proposal 3: Reporting on household kerbside collections offered by the private sector	
52. Do you agree that it is important to understand how well kerbside collections are working?	The Council agree it is important to ensure kerbside collections services are effective and that materials are viable for composting into high quality products with local infrastructure.
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?	We agree that all foodwaste should be considered of importance, regardless who generates it or collects it.
54. Do you agree that the information should be published online for transparency?	We agree that the information should be published online in aggregated form (that is, by territorial authority area, region and by collection type)
55. Apart from diversion and contamination rates, should any other information be published online?	We also would support processing statistics and output products, such as compost /energy produced, being published online.
Proposal 4: Setting targets (or performance standards) for councils	
56. Should kerbside diversion services have to achieve a minimum performance standard (eg, collect at least a specified percentage of recyclable	Potentially, kerbside diversion services have to achieve a minimum performance standard although this will not support waste reduction

<p>materials in the household waste stream)?</p>	<p>goals. It is also important that any settings account for changing habits including the impact of the CRS and other product stewardship schemes. A more suitable approach could be to set minimum quality targets in the kerbside recycling and maximum quantity/percentage targets in residual waste category as an alternative.</p>
<p>57. Should the minimum performance standard be set at 50 per cent for the diversion of dry recyclables and food scraps?</p>	<p>As above, maximum allowable recyclables in residual waste of 10% could be a more appropriate target. Quality targets of a maximum 10% contamination is the current industry standard for kerbside recycling.</p>
<p>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?</p>	<p>We believe the date to achieve minimum performance targets could be brought forward, say an interim 2025 target and an overall 2030 target.</p>
<p>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?</p>	<p>It is important to demonstrate what success looks like, as this will guide territorial authority budgets and investment decisions. Setting a success rate target (for example less than 5 % contamination and less than 5% in residual) would be a good approach.</p>
<p>60. Some overseas jurisdictions aim for diversion rates of 70 per cent. Should New Zealand aspire to achieve a 70 per cent target?</p>	<p>Residual waste will continue to be linked to consumption habits, behaviours and availability of convenient resource recovery services. Until producer responsibility is widely in place, the residual waste category will be unlikely to move significantly. Therefore suggest a focus on reducing sources of residual waste be prioritised, an example of this could be mandated packaging takeback schemes.</p>
<p>61. What should the consequences be for territorial authorities that do not meet minimum performance standards?</p>	<p>Consequences for territorial authorities not meeting minimum performance standards should depend on the circumstances. For example a lack of infrastructure or other limiting factors would require a different approach to antipathy towards the standards.</p>

Proposal 5: Should glass and/or paper/cardboard be collected in separate containers?	
<p>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?</p>	<p>We believe minimum quality standards should be required instead, with councils and commercial operators able to choose collection methodology to meet that standard.</p> <p>We support the status quo, that these items remain comingled for some councils. In order to introduce compulsory separate collects for either glass or fibre there would need to be a shift in the current ability to process nationally, in addition any mandate should allow the impact of the CRS is able to be assessed.</p> <p>In question 48, the consultation document proposes exclusion from organics of certain non-recyclable fibre products. If this progresses (not supported), it would be helpful to understand whether a mandated separate paper collection would address these materials.</p>
<p>63. If glass or paper/cardboard is to be collected separately, should implementation:</p> <ul style="list-style-type: none"> • begin immediately • wait for any CRS scheme design to be finalised • wait until the impact of a CRS scheme has been observed. 	<p>The Council supports waiting until the impact of a CRS scheme has been observed. The CRS scheme has potential to significantly reduce the composition of material received in kerbside recycling therefore this should be reviewed once the scheme is introduced and there is sufficient data available this could only be decided once the outcome and impact of the CRS is known.</p>
Proposal 6: Should all urban populations have access to a kerbside dry recycling collection?	
<p>64. Should all councils offer household kerbside recycling services?</p>	<p>All councils offer household kerbside recycling services where this is the most effective solution. For example, in a built up urban environment (inner city) a kerbside service might be inferior to a public drop-off/waste hub or other innovative approach.</p>
<p>65. Should these services be offered at a minimum to all population centres of more than 1,000 people?</p>	<p>Yes, supported.</p>

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?	Yes, in recognition of the above.
67. What research, technical support or behaviour change initiatives are needed to support the implementation of this programme of work?	Coordinated national messaging re recycling services, template collection contract specifications to support smaller councils. Cash injection to all councils to boost local recycling messaging.

Part Three: Separation of business food waste

Proposal: Source separation of food waste is phased in for all businesses.	
68. Should commercial businesses be expected to divert food waste from landfills as part of reducing their emissions?	Yes, with the correct support and infrastructure.
69. Should all commercial businesses be diverting food waste from landfills by 2030?	Yes.
70. Should separation be phased in, depending on access to suitable processing facilities (e.g. composting or anaerobic digestion)?	Mandating a service (say by 2030) will ensure investment in suitable technology. Allowance for deferral of collections if a required processing site is not operational by implementation deadline.
71. Should businesses that produce food have a shorter lead-in time than businesses that do not?	All commercial waste generators should be treated the same.

<p>72. Should any businesses be exempt? If so, which ones?</p>	<p>All waste generators need to be responsible for the separation and management of food waste they produce, guidance and support may be required for not for profit and charitable organisations who may not have suitable budget to accommodate additional costs.</p>
<p>73. What support should be provided to help businesses reduce their food waste?</p>	<ul style="list-style-type: none"> • Clear mandate requirements, publicly listed reprocessing facilities and collection companies - details available to businesses. • Education. • Support for working with food redistribution organisations and food recovery services.