

Submitted to Taking responsibility for our waste  
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## Your details

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### 3 Which region are you in?

Bay of Plenty | Te Moana-a-Toi

### 4 Are you submitting as an individual or on behalf of an organisation?

Organisation

### 5 If on behalf of an organisation, what is its name?

Industrial Symbiosis Kawerau (ISK) Inc

### 6 If on behalf of an organisation, what type is it?

Industry body

## Consent to release your submission

### 1 Do you consent to your submission being published on this website?

Yes

### 2 If yes to the above, clearly state if there are parts of your submission that you do not want published.

If yes to the above, clearly state if there are parts of your submission that you do not want published.:

N/A

## Part 1: Why we need to transform our approach to waste

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

Yes - Initiatives to stimulate attitudinal and behavioural change in support of measures to reduce wastage, minimise greenhouse gases and fully utilise resources are required to effect the necessary transformational change .

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

Yes - ISK, established in 2011, was founded on circular economy principles and supports initiatives that reduces the environmental impacts of industry and convert waste streams into new value add products. For example

Ecocast.co.nz

Ecocast blends Council bio solids, pulp waste and tiger and southern red worms to produce vermicast for application as a fertilizer. The finished product is a very high quality soil amendment which can be applied to orchards, pasture and other agricultural uses. A case study with a local maize silage growers shows a 25% increase in production.

## Part 2: Proposed new waste strategy for Aotearoa New Zealand

### 3 Do you support the proposed vision?

Yes - The vision gives clarity around the intention to effect change.

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

No – I am happy with the principles. - ISK supports the principles which will drive outcomes as they speak to the underlying need to inspire a change in attitude and behaviour. Underlying the principles should be a foundation of genuine collaboration, partnership and engagement between government,

business/industry, communities and individuals to ensure their successful realisation.

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

Yes - The transformational behavioural change required to effectively reduce waste to acceptable levels cannot occur without the support of the community. The proposed approach builds confidence in the process and motivates participation.

The timelines for each stage is realistic to ensure the full buy-in of individual community sectors.

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

ISK supports Priority 2 as the most important action as technological breakthroughs provides hope and aspiration to address the fundamental issues which are addressed in the other Priorities.

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

Working with a range of industrial businesses to understand issues and connecting innovators with these business to generate solutions and proof of concept initiatives.

Members of ISK would welcome the opportunity to participate in any research and innovation project design to affect change.

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

Inability to understand the need for change, fear of the financial impact of change and resistance to mandatory action are strong barriers to change.

Consistent messaging, transparency of the process and highlighting the positive impact of successful initiatives will reinforce the progress of the transition.

Cross-party agreement will be essential to build the momentum required to reach the 2050 outcome.

Lack of available, "every day" recyclable/reusable materials and products to replace existing products that currently require disposal in landfills.

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

No - There is no specific monitoring of products (either manufactured in NZ or globally) designed for single use or containing material that cannot be reused or recycled. The volume of these products, their proliferation, cost and accessibility will directly affect the levels of disposable waste.

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

All public sector targets should be higher than any other sector to provide examples and show leadership.

**Part 3: Developing more comprehensive legislation on waste - issues and options**

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

Yes - Government needs to take a leadership role as it is the only body that can take an objective and coordinated approach to enable a significant impact on how waste is dealt with in the community.

It is essential that local government is closely involved in the development of such legislation to ensure it can be successfully administered at the local community level by recognising individual communities' needs and variations - rather than a "one glove fits all" approach across Aotearoa.

**12 How often should a strategy be reviewed?**

Every three years - The speed of change today necessitates a constant overview of and adjustment to the strategy in response to change with more in depth modifications made on slightly longer time scale.

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

In order to maintain consistency throughout New Zealand and maximise impact, strong Government influence (both financial and strategic) on regional and local authorities is required.

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

Transparency and consistency of outcomes which are disseminated in a timely and easily absorbed manner is critical to maintain community support.

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

Yes - More attention or activity around "administering and/or overseeing regulated product stewardship schemes and any deposit return schemes that may exist in the future" as Government influence can significantly alter consumer and producer behaviour.

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

We agree that keeping all functions together under a specific Crown entity can help ensure strategic coordination. Agencies that have specific expertise and views held by industry and communities should be included through consultative and operational processes.

## **17 How should independent, expert advice on waste be provided to central government?**

Successful outcomes in waste minimisation will depend on new innovative solutions being put in place. There needs to be a pipeline for organisations with specific expertise and skills to be heard.

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

We see the service delivery side being predominantly the responsibility of local government as they are closest to the community. Regional government involvement in setting policy, monitoring and the overarching review of the processes maintains consistency across multiple TA areas.

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

Yes - The criteria around disposal of household waste assumes that there are established collection processes in the area. Many rural households in NZ do not have a comprehensive service.

Product Stewardship needs to be included in every step of the processes to minimize the collection and disposal processes and improve awareness by the consumer.

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

Yes - Observations would indicate that despite most people in the community understanding the responsibility, several choose to ignore it.

In addition to consistent educational messaging, improving compliance and enforcement section for options for mechanisms in this area is unfortunately necessary.

## **21 What else could we do so that litter is taken more seriously as a form of pollution?**

Reinforce the need for product stewardship on consumer products and leverage their marketing potential to promote the 'don't litter' message.

More/active information dissemination to the public about the environmental impacts of litter including specific education on the subject within our schools.

## **22 Do you support a nationwide licensing regime for the waste sector?**

Yes - A licensing system should include all operators to support higher levels of monitoring, reporting and compliance. It is particularly important for those dealing with hazardous waste materials.

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

As above.

## **24 What aspects of the proposals for regulating the waste sector could be extended to apply to hazardous waste?**

Hazardous waste streams should have the highest level of obligations, licensing, tracking and compliance which are consistent across all legislation and regulatory processes.

## **25 Should the new legislation keep an option for accreditation of voluntary product stewardship schemes?**

Yes - ISK supports a voluntary product stewardship scheme in the first instance but recognizes that in some cases, mandatory measures may be required to ensure compliance.

As an example, the success and benefits of effective product stewardship schemes have been proven by the NZ forestry sector where companies have voluntarily entered into independent, third-party certification of their sustainable forest management with organisations such as Forest Stewardship Council (FSC) and The Programme for the Endorsement of Forest Certification (PEFC).

## **26 How could the accreditation process for new product stewardship schemes be strengthened?**

Having an independent third-party assessment of the scheme to validate outcomes would support the credibility of the scheme.

## **27 How else could we improve the regulatory framework for product stewardship?**

Ensure clarity around responsibility, accountability and expectations. Remain flexible within the framework to encourage innovative solutions and, if levies are introduced, utilize the 'eco'-modulation' concept to encourage and reward those players who adopt best practice processes.

## **28 What improvements could be made to the existing regulatory powers under section 23 of the Waste Management Act 2008?**

Ensure there is clarity, consistency and ease of use across all legislation and regulations pertaining to products, materials and waste.

Ensure all legislation and regulations have improved environmental outcomes at their core, have practicable alternatives available and nationally consistent standards.

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

Approval for use of materials or products which generate waste should be dependent on the consumer ability to return, recycle, repair or reuse and/or a proven method of disposal or repurposing.

**30 Would you like to see a right to return packaging to the relevant business?**

Yes – While the end user should have the ability to return packaging to the place of purchase, often this process is impracticable or inconvenient and not undertaken by the consumer.

Use of packaging that is environmentally friendly and easily dealt with by the consumer would be more preferable.

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

Yes - Inability or cost of repair drives a 'throw away' mentality.

**32 Is there a need to strengthen or make better use of import and export controls to support waste minimisation and circular economy goals? For example, should we look at ways to prohibit exports of materials like low-value plastics?**

Yes - Only allow importation of a product if NZ has the technical capacity and facilities to manage the waste.

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

Levies should be applied to those activities creating the greatest problems to encourage innovative alternatives negating or minimising disposal to be implemented - particularly those processes which support a circular economy.

**34 What factors should be considered when setting levy rates?**

Levies should be nationally consistent and focus on those activities that create the highest negative impacts.

**35 How could the rules on collection and payment of the waste levy be improved?**

Administration of the levy processes should be designed to keep overhead costs and low as possible to provide an effective use of funds.

**36 What should waste levy revenue be able to be spent on?**

Investment in new technology or processes that support a circular approach and educates and promotes long-term behaviour change are priority areas. The clean up of former landfills and other contaminated sites should be the responsibility of the organisation/s involved with the waste or contamination.

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

Allocation of funds need to be coordinated and consistent with the agreed strategic outcomes across all Government sectors.

**38 How should waste levy revenue be allocated between territorial authorities?**

See above

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

Primarily, funding should be via fines imposed on offenders, i.e. "polluter pays". Such fines should be targeted directly back into supporting enforcement activities, not into a general "all-use" fund. Subsequently, the levels of fines imposed need to be appropriately substantive to (i) support enforcement and (ii) discourage further offending.

**40 What expanded investigation powers, offences and penalties do you think should be included in new waste legislation?**

Penalties should be commensurate with the level of offence

**41 What regulatory or other changes do you think would help better manage inappropriate disposal of materials (that is, littering and fly-tipping)?**

We support Government's initiatives that reduce the likelihood of litter and the proposed duty-of care obligations.