



## ERP2 Submission - Key points

Zero Waste Network - 16 August 2024

As we all know, zero waste is climate action.  
When we reduce waste, we reduce emissions!

To give feedback on ERP2 - the Draft Second Emissions Reduction Plan go to [this link](#)  
All the background information [is here](#)

You can do a short set of 5 General consultation questions  
Or go chapter by chapter and answer as many questions as you like

There are a few other submission guides which cover a wider range of topics like

- [Action Greens](#)
- [Common Grace](#)

## We have focused on the Questions in Chapter 10 - Waste

### Emissions from waste

#### 10.1 Do you agree or disagree that the Government should further investigate improvements to organic waste disposal and landfill gas capture?

Does the Waste Proposal focus on the correct area?

Yes the proposal focuses on areas that have the potential to reduce *emissions from landfill* by:

- preventing, reducing, reusing, collecting and processing organic waste
- improving the effectiveness and reporting of landfill gas capture.

The way emissions get counted means only organics, which emit methane in landfills, and activities like landfill gas capture which reduce the amount of methane escaping from landfills have a direct effect on 'waste sector emissions'.

Given the narrow focus of the ERP on reducing *landfill emissions* we agree that Government should:

- Divert organic material from landfill
- Improve landfill gas capture systems

### **Organics**

The wording in Chapter 10 Waste is a bit unclear but we assume that the intent is to maximise prevention, reduction, reuse and diversion of organic waste so that it does not need to be disposed of in landfills.

It makes sense to invest some Waste Levy Funds into resource recovery infrastructure and systems within New Zealand that reduce or recycle organic wastes and generate emissions reductions.

It is critical that investment is made in upstream activities at the top of the Zero Waste Hierarchy like preventing food waste at source, rescuing edible food, reusing textiles and construction and demolition materials as well as downstream activities like diverting food and garden waste to composting systems or chipping waste wood.

Source separation of different organics streams is critical to maintain material and compost quality so that they can go to highest and best end uses.

Textiles need to be included as natural fibres emit methane in landfill and textiles as a group have a high carbon footprint.

### **Landfill Gas Capture**

We support investigations to:

- better understand the flows of organics into landfill types,
- determine which landfill types need Gas Capture systems,
- establish settings that increase Gas Capture efficiency
- Improve the data and evidence base making reporting/ accounting more accurate

It is critical that we get better at both capturing methane and accurately measuring and reporting the success rate. The evidence base for the assumed rates we have been using in the NZ GHG Inventory of 68% are being questioned and there is a risk that a default rate of 20% may be applied. This would create a much bigger gap between our actual and target emission reductions.

Broad engagement with the sector to make best use of the knowledge and experience available regarding both Organics and Landfill Gas Capture is important.

## **Q 10.2 Main barrier HH and Businesses**

What is the main barrier to reducing emissions from waste (in households and businesses or across the waste sector)?

Businesses and households don't have access to the infrastructure and services they need to be able to participate in practical ways to reduce waste emissions.

Many of the programmes and incentives that are common in other countries have not been developed in Aotearoa.

Councils do not have a clear direction of travel as the recent change of government has seen the waste work programme put on the back burner. This makes it difficult for them to secure ratepayer funding and the sign off from councillors that is required to get big organics infrastructure projects embedded into their long Term Plans or to develop regional partnerships to plan and build facilities.

New Zealand households and businesses want to do the right thing but the leadership , Regulatory Framework, infrastructure and systems are just not there for them.

### **The ETS is a tool but not a whole strategy in itself**

The use of the ETS as a market instrument makes some sense if people have alternatives to use instead of landfilling. Viable and practical alternatives for the business / household to switch to need to be in place for a market instrument like the ETS to be effective.

The Landfill levy rate and the ETS price are still both too low to drive any real change in waste disposal activity.

## **Q 10.3 main action by Govt**

[What is the main action the Government could take to support emissions reductions from waste \(in households and businesses or across the waste sector\)?](#)

Successive Governments have been kicking the can down the road on implementing waste policy. Progress with updating the waste legislation and regulatory framework, establishing effective product stewardship schemes and establishing systems, incentives and infrastructure has been very slow.

### **Keep the momentum up**

We support the Government continuing to progress the waste actions that were detailed in ERP 1. Some of these are still active and others are 'pending decisions'. It is critical that these actions are not delayed any longer. They were already clearly signalled and delaying implementation creates uncertainty for the sector.

We want to see progress on these actions that are waiting on decisions:

- Mandated food scraps collection policy
- Require separate collection of organic waste
- Enable the separation of construction and demolition materials
- Develop a national waste licensing scheme.

Keeping organic materials out of landfill reduces methane emissions and creates multiple co-benefits including;

- Replacing organic matter in soil which works as a nature based solution that increases resilience by improving water retention capacity which reduces exposure to both drought and flooding.
- We depend on healthy soil to grow food, fibre, timber and other forms of biomass which are critical inputs into the economy.
- Rescuing food and passing it on meets social need and engages local communities
- Preventing food waste by only buying what you need avoids unnecessary upstream emissions from growing, processing, packaging, and refrigerating food that does not get eaten.
- Deconstructing buildings and reusing timber and other materials retains embodied carbon.
- Reusing clothing and textiles means new ones do not need to be produced from virgin material limiting upstream environmental impacts and ecosystem damage.

## **Waste reduction**

Government needs to continue to progress waste reduction activities in line with the zero waste hierarchy alongside the ERP2 emissions reductions actions. Resource Efficiency is a useful tool for reducing both waste and emissions.

We strongly support the proposal to use a proportion of the Waste minimisation fund to target infrastructure projects and systems that reduce organic waste and emissions (and other waste streams) including those that:

- develop and implement schemes for businesses, manufacturers and consumers to take responsibility for the products they produce and buy (product stewardship schemes)
- expand and upgrade resource recovery facilities (including transfer stations)
- investigate and, where appropriate, develop infrastructure for renewable energy recovery of hard-to-recycle materials (eg, wood waste).

Coordination of and provision of this kind of public good infrastructure along with the necessary regulatory framework enables businesses to put sustainable packaging and products on the shelves and households to shift towards zero waste lifestyles.

## **Q 10.4 What else could be done**

[Please provide any additional feedback on the Government's thinking about how to reduce emissions in the waste sector.](#)

Product stewardship / Extended Producer Responsibility is a key waste policy tool for reducing supply chain emissions which results in emissions reductions for other sectors (but not necessarily for the waste sector). The Circular Economy Chapter which is part of ERP 1 recognised these opportunities but this is no longer a focus in ERP 2 which leaves a big gap.

The ERP2 Waste proposal has been developed within the limitations created by the Internationally agreed approach that is used to account for and report on the emissions each

country generates. The ERP and New Zealand's wider Zero Carbon Framework is based on counting the emissions that New Zealand produces onshore.

These are divided into sectors, one of these being the Waste Sector. The only emissions sources allocated to the Waste Sector are solid waste disposal, wastewater treatment and discharge, Incineration/open burning of waste and biological treatment of solid waste. Waste sector emissions are mainly methane created by the decomposition of organic material.

The ERP actions for Waste focus on diversion of organics from landfill and improving landfill gas capture because these activities will help to reduce 'waste emissions'.

The supply chain emissions that are produced offshore to extract, transport, manufacture, package and distribute products that are imported into New Zealand to meet the demand of businesses and households are not included. Onshore supply chain emissions like transport of goods, recycling and waste get counted in other sectors like Transport. These supply chain emissions are called consumption emissions.

Most of the opportunities to reduce emissions generated in the production and consumption of products and packaging are in the supply chain but since they are not counted in the waste sector there are no proposals included in the ERP to try and reduce these. Product Stewardship and Extended Producer Responsibility fall between the cracks.

It is critical that the Government continues to take actions that work at the top of the zero waste hierarchy to design out waste and pollution, to keep products and materials in circulation for as long as possible and to regenerate natural systems. Circular Economy is a core element in the agreements we have with our key trading partners.

Action to reduce waste generates emissions reductions across the other sectors and needs to be progressed through the implementation of the Waste Strategy so that waste reduction and emissions reduction can be achieved alongside one another.

## **Don't use Incineration**

Many countries have Incineration as a large Greenhouse Gas emissions source in their waste sector. Denmark burns a large amount of mixed rubbish including waste plastics in incinerators and is not able to meet its recycling targets or its emissions reduction targets. Denmark has started to shut down incinerators in order to increase reuse and recycling and reduce emissions.

There are at least 2 proposals on the table in Aotearoa to develop incinerators that can be used to burn mixed solid waste (Waimate and Te Awamutu).

Given that we are investing heavily in reducing waste emissions it makes no sense to introduce a major new emissions source when the goal of the Emissions Reduction Plan is to implement least cost solutions to achieve the exact opposite.

The cheapest way to reduce emissions is not to create them in the first place.