



Zero Waste Network Submission

Auckland Council's Draft Waste Management and Minimisation Plan (WMMP) 2024
28 March 2024

Prepared by Sue Coutts for the Zero Waste Network Aotearoa

Contact: sue@zerowaste.co.nz 027 322 9675



The Zero Waste Network is a membership organisation with 120+ members across the country who work towards Zero Waste with their local community. 77 of these are full members providing practical resource recovery and behaviour change services. One of these members is Para Kore which is a network in its own right.

Our members employ 1,239 people who work in resource recovery and environmental education. Collectively we recover 29,000 tonnes of material each year and feed \$88 million dollars back into local economies through our enterprises.

Our mission is to:

- connect and empower a network of zero waste community enterprises across Aotearoa
- inform policy and procurement
- trial and deliver zero waste solutions

The Zero Waste Network is based in Auckland and Wellington with board members spread across Aotearoa.

Thank you for the opportunity to make a submission on the Draft WMMP. We appreciate the progress that has been made by Auckland Council over the last six years with the second WMMP despite the tough operating environment.

We acknowledge the hard work that has gone into putting this Draft WMMP together and the willingness to engage with Iwi, business and community to put the best possible WMMP on the table.

Question 1. Direction

The draft WMMP focuses on ways to reduce waste being created and sent to landfill, with actions aimed at the top of the 'waste hierarchy', e.g. redesigning, reusing or repairing items.

It also supports actions further down, e.g. recycling materials. The WMMP's goals centre on keeping resources in circulation and minimising harm to the environment and communities from waste. See section 3 of the Snapshot document.

What do you think of this direction?

Support Do not support Don't know

Tell us why or what changes you would expect to see

Direction of travel - Zero Waste by 2040

We strongly support the proposed direction (Option 2) which:

- affirms a strong zero waste vision for both people and planet,
- centres the waste hierarchy as a guide for action, and
- sets the intention to prioritise actions at the top of the waste hierarchy.

Option 2 leverages the good progress Auckland Council has made with the previous WMMP (2018-24) and doubles down to have a greater impact over the next six year cycle by:

- Building partnerships with organisations which share the zero waste kaupapa
- Putting mana whenua and mataawaka front and centre - encompassing te ao Māori, involvement in decision making processes, access to enterprise opportunities.

- Bringing everyone in the city on the journey - engaging with, supporting and educating business, communities and households.

Option 2 pulls the right levers by actively advocating for:

- Government to establish a comprehensive and effective regulatory framework along with the necessary economic instruments to implement product stewardship schemes like a Deposit Return Scheme for drink containers.
- Industry and businesses to adapt their business and service models and to put better products on the shelves so that waste and pollution are designed out of Auckland's economy as well as requiring source separation and diversion e.g. through Waste management plans for Construction and Demolition jobs.

Leadership

We applaud Auckland Council for showing leadership in taking a true zero waste approach to the WMMP. Zero Waste and circular economy strategies provide a roadmap, a toolkit and a destination to help Auckland build a resource and energy efficient economy and create a strong and stable resource recovery sector.

Auckland Council is recognised as a national and global leader for being a city that is using zero waste as a tool to scale up climate action and build more equitable communities.

The WMMP reflects a strong commitment to putting in place the 6 city actions recommended by C40 to improve waste management and reduce emissions:

1. Establish city wide universal collection and safe disposal
2. Don't invest in solid waste incineration
3. Focus on reducing and treating food waste
4. Boost recycling rates
5. Reduce waste generation and encourage a circular economy
6. Set a zero waste goal to reap social, economic and environmental rewards.

Council's leadership in this space includes:

- **Global recognition.** Auckland Council has been internationally recognised through C40 for its innovative approach to working towards zero waste which combines its zero waste by 2040 vision, with a set of practical actions to achieve results and grounding the work in Iwi and community partnerships.
- **Putting mana whenua and mataawaka front and centre.** Strong commitment to learning from and building in te ao Māori, engaging Māori in decision making processes, creating access to enterprise opportunities and using the WMMP to deliver outcomes that are important to Māori.

- **Providing a working model.** Council's use of a strategic procurement approach to build an effective resource recovery network creates practical pathways for other districts and cities to follow.
- **Mentoring and support** for councils and communities across the motu by sharing with other councils and communities what has been learned so far. Staff and councillors make a valuable contribution to national conversations through forums and sector groups.
- **Role in the pacific** - Auckland Council has a critical role to play in supporting and enabling the pacific community across the city to engage with zero waste and emissions reduction as well as sharing and learning with pacific nations.
- **Coordinating and enabling collaboration** across sectors to support new projects and initiatives to get off the ground.
- **Advocacy for Government action** by lending the weight of New Zealand's biggest city to calls for a comprehensive regulatory framework and the economic levers needed to drive waste reduction.

Zero Waste and Circular economy

We support the intention to implement zero waste and circular economy strategies.

Focusing at the top of the waste hierarchy will help slow down Auckland's consumption of raw materials. Landfills are a symptom of our waste problems. The real problem is that there are twice as many people on the planet as there were in the 1970's and we are pulling four times as many resources out of our environment into the economy.

When we throw stuff away we have to extract new resources and use more energy to replace it. This causes biodiversity loss, ecosystem damage, and greenhouse gas emissions. Zero waste and the circular economy are all about keeping resources and embodied energy in circulation for as long as possible so we don't have to draw so much out of our environment.

Action at the top of the hierarchy looks like:

Prevent

Preventing waste in the first place by redesigning products and business models means less litter, less plastic pollution, less landfills and no need for CO2 emitting incinerators. Designing out waste and pollution at the source means communities and councils avoid the long term costs and risks associated with managing large volumes of waste products and materials.

This requires changes to business models, service models and the kinds of packaging and products being put on the shelves. Support for businesses that are shifting to more circular approaches and clear definitions of what circularity looks like in practice, to avoid greenwash

and confusion, are important roles for the council. This creates opportunities for businesses working ahead of the curve and helps establish the operating conditions that support them to grow faster and have a bigger impact than they would otherwise be able to.

Reuse

Shifting away from single use disposable and short life packaging and products is a crucial step in reducing raw material consumption. Slowing down the flows of goods, packaging and materials is a key element of circular economy practice. Council's investment in the resource recovery network and the inorganics warehouses is helping to shift the dial towards reuse of second hand products and materials. Much more needs to be done in this space.

New business models can mainstream reuse which reduces overconsumption by:

- supplying a product as a service e.g. washing and reusing the cup your coffee came in.
- giving access to sharing services for transport, tools and other goods which means fewer products need to be in circulation at any one time.
- making products more durable and easy to maintain and repair to increase their lifespans means fewer cheap, junk items flowing into landfills.

Council can support the development of systems that make it more practical for reusable cups, packaging and serviceware to be used by hospitality, food and drink service and at events. They can also require reusables in specific situations including all in house catering. Coordinating action across multiple small businesses would accelerate progress as it is difficult for individual businesses to create comprehensive and viable reuse solutions on their own.

See Q2 C for more detail on this in relation to the five priority waste streams esp. Plastics, textiles and packaging

Repair

Repair is a useful example of the layers of interventions that have to be made to give Aucklanders access to services that help them to reduce waste. The various priorities and actions outlined in the WMMP work together to drive change, so it is important to recognise the overlaps and the need to take a systemic approach.

The work that has been done by Consumer, Repair Cafe Aotearoa and the WasteMINZ Product Stewardship sector group and others advocating for the right to repair and durability has gained traction. We support Auckland Council putting its weight behind these campaigns under Priority 6 and action 6.1. Product Stewardship design also needs to factor in durability, reuse and repair under 7.2 so that schemes do not only focus on end of life recycling options.

Auckland Council has an important role to play in developing and scaling up the network of repair shops and repair cafes across the city so that maintenance and repair services are readily available. Action 12.2 already covers the opportunity to support existing service providers by promoting them and making them more visible. It also enables working with others to raise awareness and foster a culture of reuse, repair and durability across generations.

There is a gap in the WMMP around supporting the development of practical repair services. It would be good to include this in the actions associated with expanding and strengthening the resource recovery network. Action 2.2 could include repair cafes and repair services as part of the special services provided within, or alongside the network. Action 12.1 Focused community programmes is the only other obvious place for partnering to ensure repair events and services are provided.

Recycle

Recycling is important to keep materials circulating but it needs to be the last resort after businesses and households have done everything they can to avoid using single use disposable packaging, service ware and short life products.

Auckland needs to focus on shifting towards high quality, closed loop recycling systems. Source separation plays a key role in getting clean, single stream, raw materials to be incorporated as recycled content in new products and to feed clean organics into our composting systems. Product stewardship schemes like Deposit Return schemes for drink containers and the Resource Recovery Network sites across the city are critical levers for achieving this.

Compost see Q2C Organics for detail

According to the waste hierarchy in the current NZ Waste Strategy, circular management of materials and products ends with recycling. A useful definition of effective recycling being that the material collected, sorted and processed is suitable for inclusion as recycled content in a new (preferably like for like) product and displaces the need for virgin material.

Once material or products fall below this level they are in the waste management system. There is a cost attached to collecting and disposing of this material and often ongoing risk management issues and potential costs for future generations and our environment e.g. risk associated with landfills at risk of inundation due to sea level rise.

It is critical that investments and actions are made in the top half of the waste hierarchy in order to reduce long term cost and risk by shifting Auckland towards a more circular low waste low emissions economy over time.

Detailed comments on sections 1 to 7 and 10

P9 We suggest removing the 'decision to dispose' line. This is unnecessary and confusing. Each step in the hierarchy involves a decision to treat resources in a particular way. The position the line is in now is where a decision is made to divert to recycling or composting so the use of the word dispose is confusing.

We support the 7 principles that will underpin decision making.

Goals

We support the 2 goals and 8 objectives

We suggest the following minor changes to strengthen the connections between the different parts of the WMMP - objectives, rationale and actions.

Goal 1 Maximise circularity in line with the waste hierarchy

1. 'Designing out waste' line needs to include: supporting the development of new business and service models, improved product design....
2. Organic waste is *prevented or* diverted from landfill in the header and a bullet point added to cover prevention / source reduction strategies for food and organic waste including textiles and packaging. Diversion is necessary but not sufficient.
3. Network of infrastructure needs to include a bullet point that covers soft infrastructure which includes capability and capacity of organisations and staff working in service provision and behaviour change, plus systems and processes including IT and tech solutions alongside the traditional hard infrastructure of sites and equipment.
4. Data and information needs to have a bullet added on better understanding of material and product flows. The point about embodied carbon could be expanded to include supply chain emissions and embodied carbon as they are not the same thing. Also important to better understand the emissions implications of different disposal options.

Goal 2 Minimise harm

6. Add a specific reference to plastic and microplastic pollution as this shows up consistently as a key area of concern in annual public surveys.

Methods to deliver on the objectives

Add the following to create a more comprehensive list

- Advocating for industry to adapt product and packaging design as well as business and service models
- Use Council procurement of goods and services

Section 10 Statutory and Strategic Context

10.4 it would be useful to split out the Emissions Reduction plan from the Waste Strategy commentary - give it a separate section or a subheading.

The paragraph that describes this work is a bit unclear. It would be helpful to include a few sentences about how emissions are generated from waste in landfill and the process of collecting and processing waste, recycling and organics as well as the upstream supply chain emissions which are often described as consumption emissions. This links into the low emissions aspects of circular economy and ties back to the priority focus on product stewardship and Objective 2 - organics.

Typo p20 row 2 eleven CRC's other parts of document say 13.

Key Priorities - Empowering Iwi and community partnerships

Mana whenua and achieving Māori outcomes

We support Priority 1 and celebrate Auckland Council's commitment to strengthen ways of working with Mana Whenua and the intent to deliver outcomes of value to Māori through waste initiatives and actions.

We support the council's intention to work in partnership with Iwi and alongside mataawaka and the decision to place this intention front and centre in the WMMP.

We acknowledge the value of growing an understanding te ao Māori and recognising kaitiakitanga in working towards zero waste. The intergenerational transfer of knowledge will be an important element in motivating and enabling Aucklanders to achieve zero waste by 2040 alongside related work to restore and protect te taiao.

We support using the WMMP and the actions and associated investments to embed a te ao Māori approach and to achieve the outcomes important to mana whenua and mataawaka (Auckland Māori not in a mana whenua group) outlined in section 5.1.

These include:

- Development of effective and nurturing working relationships
- Active involvement in decision making
- Access to resources and support
- Development of social enterprise opportunities for mana whenua and mataawaka
- Environmental protection outcomes achieved for land, water, air and ecosystems
- Incorporation of mātauranga and tikanga Māori into programmes and activities to enable intergenerational transfer of knowledge and skills.

Resource Recovery Network

We support priority 2 to continue expanding the resource recovery network and its services.

There has been a long standing working relationship between the Zero Waste Network and Auckland Council to develop the resource recovery network.

We appreciate the trust and confidence that council has in the community sector to deliver services and behaviour change. These organisations are kaupapa driven and embedded in their local communities. They create good jobs and put money back into their local economies.



Community Resource Recovery Centres or Zero Waste Hubs:

- Deliver services communities want: behaviour change, reuse, repair, composting and recycling.
- Are ideal drop off points for future product stewardship schemes like e-waste, plastics and Deposit Return for drink containers.
- Facilitate reuse of household goods, building materials and other reusables
- Combine engagement and education with service delivery. That means the households and businesses they work with come on a journey up the waste hierarchy so that reducing, reusing, recycling and composting become the norm.
- Collaborate through national and local networks to share knowledge, skills and experience and develop innovative solutions.
- Collective work on behaviour change supports the shift by households and businesses away from single use, towards reuse, durability, 'Right to Repair' and sharing models.

We support the planned expansion of the network as outlined in the 2021 Resource Recovery Network Strategy. We encourage the council to continue to explore innovative procurement options for adding new sites across the city.

It is critical that the network of local resource recovery centres is underpinned by the development of the Waitakere Resource Recovery Park. This larger scale facility will provide complementary services and will enable larger scale flows of materials and products from commercial operators. Transitioning this site from the current transfer station model to a purpose built resource recovery focused facility will significantly increase diversion opportunities.

The Auckland Council and Community Resource Recovery Network (ACCRRN) has been an effective mechanism for coordinating activity and development across the network. The working group drawn from the members of the ACCRRN leadership team is making good progress with developing a governance model based on the partnership approach prioritised in the WMMP.

We encourage the council to continue to progress this model which reflects the maturity and integrity of the relationship that has been developed over the last 10 years. The ACCRRN relationship and implementation framework provides a useful base for establishing the right structure for the ongoing partnership. Successful delivery of the 8 community recycle centres and two resource recovery parks in the next stage of the resource recovery networks development requires an effective Governance model like this.

Work that has been done to date to pilot and develop the operating model has been possible because of the effective working relationship created through the ACCRRN approach. This innovative partnership model would also enable exploration of how the resource recovery network could support the delivery of the inorganic collection service to divert more material and increase the efficiency of the service.

We recommend that the council invests in measuring and understanding the impact of the work that is being done. A great deal of practical research and development work is being done by the existing sites. This includes development of reuse opportunities such as on-selling salvaged fittings, cabinetry and materials from deconstruction projects. A comprehensive monitoring, evaluation and learning process would be a valuable addition to the work in progress.

This will help define the model, show how it is helping achieve outcomes that are valuable to Aucklanders, support sharing of lessons learned and create a proof of concept. This kind of evidence base would underpin an approach to the central government to secure funds to fast track the resource recovery network development.

Behaviour change

We appreciate Auckland Council's commitment to invest in education and behaviour change (in house and by external providers) to help communities and businesses become familiar with zero waste, circular economy and emissions reduction and adaptation strategies. Changing mindsets and behaviours so that low waste, low emissions becomes the default setting is a major inter-generational change management process.

The resource recovery network sites, environment centres and a wide range of other organisations play a critical role in engaging and supporting businesses and households to try new things and to adapt to changes in production and consumption. It is critical that council continues to partner with and support these organisations who play a vital role in shifting people towards zero waste lifestyles.

Key Priority that underpins the other 11 - Working with others

We support Priority 12 and the emphasis on Auckland Council working with others who have shared values and objectives to deliver on this plan. Empowering Iwi, community and other partnerships is critical because we need everyone on board to achieve a zero waste Auckland built on a circular economy.

Table 1 row 12 - The list of partners is not complete - good to add Māori, Government, other councils, and regional organisations.

P31 It would be useful to separate out the tertiary and commercial sectors.

There is some overlap but there are also important differences, in particular the commercial opportunities for using new business and service models that design out waste and pollution and keep products and materials in circulation.

The model council has been using for the Construction and demolition sector could be usefully applied to the hospitality sector to address single use plastic and packaging issues which have been identified as priority areas.

Details in action points

12.2 Focused community programmes - leave room for new programmes that may come on stream over the next six years. "...including the opportunity to *add new programmes and to expand and diversify programmes...*

12.9 Strengthen Business Waste by having a separate description for the advocacy and support for designing out waste through new business and service models and putting new types of products on the shelves alongside the more standard in house diversion activities relating to resource recovery for materials, products and organics.

This two pronged approach can be carried across into the "What it means for Aucklanders" column e.g. New business and service models will make it easier for Auckland residents and businesses to use their purchasing power to drive the shift to a low waste circular economy.

Key Priorities - Targeting specific activities and materials

We support Priority 3 - see response to Q2B for detail

We support Priority 4 - see response to Q2C for detail

Climate change

We support Priority 5 - Disaster preparedness, climate change mitigation, adaptation and resilience.

Zero waste strategies have an important role to play in reducing both the upstream supply chain greenhouse gas emissions and the downstream methane emissions generated by organics decomposing anaerobically in landfills. These are not consistently incorporated into all the sections of the WMMP at the moment.

There are two main channels for climate change mitigation through zero waste action which align with the Government's Emissions Reduction Plan and Auckland's Climate Plan.

The two main mitigation opportunities are:

1. **Preventing and diverting organics from landfill** - reduction in methane emissions - this links back to Objective 2 and needs to be embedded into each part of the document. This needs its own Action in the list on p67- 68 that specifically references methane emissions from landfills and the role of prevention and diversion activities in reducing this including mention of timber, paper and card, textiles, food waste, garden waste. It is missing at the moment.
2. **Preventing and reducing the amount of material/products flowing** through the economy which reduces supply chain and embodied emissions which are often called consumption emissions needs to be more clearly defined. This reduces CO2 emissions which links back to Objective 1. This is partly covered by Action 5.6 Embodied carbon but the point needs to be expanded to include other supply chain emissions from transport, refrigeration, warehousing, retail etc so it is comprehensive.

It would also be useful to make the link to scope 3 emissions and provide a short explanation of what these are in the commentary about emissions mitigation in the WMMP document. They are the most relevant to businesses and organisations working on measuring and reporting on their own emissions and reduction efforts. It can be confusing for people trying to reconcile the different methods of accounting for and measuring emissions.

Nature based solutions such as improving the ability of soil to hold water by building organic content through the application of compost would help to protect against flood damage in the medium term.

Community Resource Recovery Centres play an important role in responding to community needs before, during and after emergencies. For example acting as coordination, collections and distribution points for household goods and other items needed by households whose homes were flooded in 2023.

Community and Māori organisations play an important role in community building and creating pathways for resilience as communities work together to adapt to climate change and other societal shifts as well as respond to ongoing emergency events.

Table 1 row 5 needs to include additional points alongside the readiness issue to encompass all the roles that zero waste strategies play in mitigation (supply chain and methane), adaptation (working together to find and develop new pathways) and resilience (community empowerment and disaster management). It is important that these are woven into Table 1, the narrative in other sections as well as the Actions list so the story line is consistent across the document.

Key Priorities - Advocacy for future action

Advocacy for an effective regulatory framework and a comprehensive toolkit of economic levers and incentives to drive product stewardship and business model changes is critical. The transition to a low waste, low emissions economy can only happen if this national framework is in place.

There is only so much that council, communities and small businesses can do. We need the players with the power to pull the big levers on board. Government needs to establish a comprehensive regulatory framework and set of economic instruments. This will shift costs and responsibility for infrastructure and operational funding off councils and ratepayers and onto the producers who put products and packaging into the market in the first place. Industry and business need to change their business and service models and put better designed packaging and products on the shelves.

We support Priority 6 - see response to Q2D for detail

We support Priority 7 - see response to Q2D for detail

Final disposal - Incineration

The WMMP section 11.7 outlines how some waste to energy facilities are being used to treat waste materials including the anaerobic digester in Reporoa, Watercare's wastewater treatment plant, the Golden Bay cement kiln and landfill gas to energy plants.

Incineration of mixed rubbish is being proposed in adjacent districts. This is described by the proponents as a 'waste to energy' option. We consider this to be a greenwash label. There is some talk about taking mixed rubbish from Auckland to incinerate in an incinerator being proposed in Kaipara.

We urge Council to specifically rule out Incineration as a disposal option for Auckland's mixed solid waste.

Burning mixed solid waste will not help reduce waste or emissions.

Incineration would take Auckland in the opposite direction to the low waste, low emissions future described in the Draft WMMP because it is just another disposal method at the bottom of the waste hierarchy. Ruling out Incineration is in line with C40 guidance which outlines six city actions

to make the shift to a low waste, low emissions economy. Number 2: Don't invest in solid waste incineration.

Burning or burying resources means we have to keep extracting new materials and energy to create more products which damages ecosystems and our climate. We are all working hard to reduce methane emissions from organic waste going to landfill, it doesn't make any sense to start burning fossil based plastic, which would create a new source of CO2 emissions.

- Incineration works against circular economy, zero waste and resource efficiency
- Requires landfills to contain toxic by-products and releases toxic pollutants into air and water.
- Requires strong environmental controls - compliance, monitoring and enforcement.
- Investing in a large scale incineration plant would lock Auckland into a linear throwaway future because incinerators rely on long term contracts to secure a continuous supply of rubbish to burn.
- Incineration is out of step with New Zealand's 100% renewable electricity target, burning rubbish is an inefficient and expensive way to generate a very small amount of non-renewable electricity.

Key Priorities - Delivering direct action

We support Priority 8 to support Aucklanders to use the services available to them.

Having the knowledge and confidence to use the systems provided and understanding why it is important to separate materials and live a zero waste lifestyle will enable households to get on board with zero waste by 2040.

Regular feedback to show how their actions are making a difference is a key element in maintaining trust and confidence in recycling and composting systems. Behaviour change organisations across Auckland who partner with council need to be resourced so they can help achieve this.

We support to Priority 9 see response to Q 2A for detail

We support Priority 10 to minimise Councils operational waste and the intention to lead by example.

Table 1 row 10 Needs to include a separate point about the use of procurement of goods and services as a method for achieving upstream source reduction as well as downstream diversion.

Action 10.2 Target Operational waste through sustainable procurement has a focus on construction and demolition related actions. It would be clearer to give it a C&D specific label and to shift 10.2 (a) around councils leadership role into 10.1 where it is a better fit. This needs to refer

to leading *zero waste* and waste minimisation to be consistent with the earlier commentary. On its own waste minimisation is too weak.

Also useful to tag the procurement story to the ongoing work to embed the council's Sustainable Procurement Framework across the organisation.

Council could strengthen its approach by making greater use of procurement processes to leverage its purchasing power across spending on all goods, services and contracts. This will improve zero waste outcomes and grow enterprise opportunities for Iwi and community organisations as well as businesses adopting circular business models.

This includes active support for local businesses who are leading the way with low waste, low emissions goods and services: catering, office and IT support, service models for transport, hospitality, events etc. This needs to be broadly applied across all council offices, across all operators of council facilities and all contracts not siloed in the delivery of construction and demolition and waste and resource recovery services.

Actions 10.4 to 10.6 touch on this but could be strengthened by carrying the words and language in the top of the Waste Hierarchy into these line items.

Action 10.4 Leases of council property - Include reference to embed the requirement to put into practise and report on the zero waste policy into lease agreements so that leesees are required to deliver on the zero waste policy not just have it as a 'policy' page in their documentation.

Action 10.5 Office waste - Needs to be a wider frame - Office waste has its own target in section 9 so it is useful to expand on what this covers. The commentary around office waste on p24 focuses on diversion strategies. It alludes to opportunities in behaviour change, new systems and ongoing staff training but needs to specifically refer to the upstream potential of procurement and prevention to drive source reduction. This applies to fittings and furniture, office supplies, catering and smoko, cleaning etc. Good to use the source reduction, reusable packaging, new product and service models language to create a clearer picture of what will drive the achievement of this target.

Action 10.6 Include reference to reusable serviceware, designing out single use packaging.

We support Priority 11 - Address litter and illegal dumping - see response to Q 2E for detail

Question 2. Priorities for action

The draft plan includes 12 priorities for action. The following questions relate to some of the specific priorities.

Question 2A. Fortnightly rubbish collections

Food scraps make up 41% of the rubbish in your rubbish bin. We have introduced a weekly food scraps collection service in mainland urban areas so you will have more space in your rubbish bin. Cities such as Christchurch, Tauranga and Hamilton, and in other parts of the world, show that by using a weekly food scraps bin households can comfortably make do with a fortnightly rubbish collection.

We propose introducing a fortnightly rubbish collection for most Auckland households from 2026, with options for a larger bin for households that need it. Cost savings will be passed on to ratepayers. We will also investigate options to divert other items from household rubbish e.g. nappies and medical waste.

What do you think of this priority area?

Support Do not support Don't know

Tell us why

We support Priority 9 and the staged approach for the shift to fortnightly rubbish collections.

Global evidence shows that smaller / less frequent rubbish collections help reduce waste. Auckland Council has a solid plan for making sure households have access to regular recycling and food scraps collections (which remove volume and smell issues) and for education and engagement that supports people to get on board with recycling and food scraps separation. We agree that fortnightly collections will reduce both cost and emissions over time.

We support the council considering flexible bin sizes for large households needing extra support or bin capacity, as well as the option of lower rates charges, further reduced collections and smaller bins for residents who produce low or ultra-low waste. It is important to reward residents who support the Zero Waste 2040 transition by producing less recycling, food scraps and rubbish.

Question 2B. Construction and Demolition Waste

Waste from construction and demolition (C&D) activity makes up almost 40% of commercial waste in landfills. Reducing this waste and making better use of materials from C&D is a priority in the draft WMMP over the next six years. This will help us reduce Auckland's total waste to landfill by 30% by 2030.

What do you think of this priority area?

Support Do not support Don't know

Tell us why

We support Priority 3 to target Construction and Demolition waste.

Construction and demolition materials are a major waste stream. There are opportunities to prevent and reduce waste at source through the design and construction phases as well as by repurposing buildings for new uses. Council has an important role to play in coordinating the flows of ideas and information across the construction and demolition sector. Many organisations and businesses need to work together to find upstream solutions which design C&D waste out of the system.

Source separation is a critical activity. Salvage for reuse is dependent on being able to secure quality parts and materials, the right things need to be removed from a building at the right time. Access to deconstruction opportunities enables second hand materials to be fed into solutions up the waste hierarchy by making them available to organisations and individuals who can make good use of them.

The Deconstruction Panel is a good example of how the council is supporting this kaupapa. Accrediting suppliers who have the skills and experience in the deconstruction for reuse space is a good example of how strategic use of procurement can be used to support the growth and development of businesses like TROW and Onehunga Zero Waste that share the councils zero waste goals and objectives.

The Resource Recovery Network provides outlets for reusable timber, metals, kitchens, plumbing and other reusable materials that can be incorporated into building projects. Some of these are new surplus items from construction, others second hand. The 'Men's shed' and other community maker space and tool share projects enable people to make use of waste materials and learn skills to repair and build.

We agree that mandatory site waste management plans are an effective tool for getting companies on board with onsite source separation. These need to be audited to ensure they are being followed through on by the beams onsite, by the collection company and by the string and processing facilities.

Question 2C. Priority waste materials

We propose to focus on five priority waste materials:

- *organics (including food scraps, green waste, timber and cardboard/paper)*
- *plastics*
- *packaging*
- *textiles*
- *biosolids (the organic material resulting from sewage and wastewater treatment).*

These are the materials that make up significant volumes in landfills, release greenhouse gases, or are problematic when they break down – such as microplastics in the environment.

What do you think of these priority areas?

Support Do not support Don't know

Tell us why

We support a focus on the 5 priority areas in order to prevent and reduce waste.

We are encouraged to see Council focusing on source reduction to embed actions up the waste hierarchy to address these Material and product streams. This includes ambitious actions that go beyond diversion to focus on reducing plastic waste Action 4.5 and to move towards reusable packaging systems Action 4.6. We would like to see this approach to source reduction consistently applied across all the priority waste materials.

We support the intention in Priority 4 to work to change behaviour in relation to these waste streams. It is critical that producers and businesses are included in this alongside consumers and households.

There is no silver bullet so the concept of a suite of solutions is a good way to frame the complementary actions necessary to shift the dial so our economy becomes more circular. Business models, service delivery models and product designs all need to change.

Once businesses and industry mainstream new business models to create systems for sharing, reusing and repairing (e.g. car sharing, product rentals, reusable packaging systems and product maintenance and servicing), then it will be easier for consumers to change their buying behaviour and to shift to low emission zero waste lifestyles.

We note that the behaviour change, engagement and education work required to shift awareness and understanding and catalyse action are included in other Priority action lists primarily 12. Partnering with others.

Organics

We support the recognition of the value of local scale and 'community-led' solutions for organics collections and processing, particularly Actions 4.2 and 4.3.

Diverse supply market

We would like to see local scale and community led solutions framed as critical parts of an integrated citywide ecosystem approach to organics diversion, where city wide kerbside collections, education/engagement and local processing can mutually support one another.

A diverse supply market is a sign of a healthy economy. Community and local scale enterprises and organisations are already doing a lot of good work to divert and process organics across the city. They are also actively engaging communities to support them to prevent, divert and compost organic material and food scraps. This work links into food waste prevention, food resilience and food production.

Developing a strategy for the organics diversion system would help to resolve the current situation where the different levels of organics diversion activities and community engagement and education are perceived to be disjointed and at odds with each other.

This would create a both / and solution where small, medium and large scale activities fill different niches in the supply market. New York has been implementing this type of approach to build up local scale solutions alongside the city wide collection service. Operators and educators link households and businesses with the most appropriate solution for them.

The C40 guidance is clear that resource-constrained cities should focus on composting as it is simpler and cheaper than capital intensive alternatives. Given current budget constraints it makes sense to grow small to medium scale local composting solutions. There is an emerging Auckland wide network for the council to partner with.

We support Auckland Council working with existing organisations with the relevant expertise in small & medium scale organics collections and processing, particularly the Tāmaki Makaurau Composters Network, as a local branch of the Aotearoa Composters Network (ACN).

Action 4.2 needs to include a specific reference to exploring revenue models.

Quality

Quality of outputs from composting and processing systems is a critical factor in the success of organics collection and processing activities. Bulk flow systems often result in poor quality lowest common denominator outputs. Differentiating between processing options would enable high quality organics streams to be fed into the system most likely to preserve material quality. Which in turn enables a high quality end product to be applied to soils.

There are some innovative solutions being tested with organics being used to transform soils e.g Banana swale systems in Whangaparaoa. It is important that the council invests in research that captures the value of different processing methodologies and can clearly show the impacts.

The relationship between composting/processing treatment and value of the output for application to soils to maintain structure, soil retention capability and fertility needs to be captured and used to support decision making. Soils that retain water are green infrastructure solutions that can play an important role in reducing the risk of flooding.

Action 6.2 Regulatory change needs to include a reference to the requirement to source separate materials to create clean streams for composters and material reprocessors.

Contamination by whole objects, particles and chemical compounds all need to be considered. This includes the impact on outputs of degradable and compostable packaging which can contain substances that are not suitable for application to land. For example there is a growing literature around the impacts of PFAS contamination of soils. A comprehensive testing programme needs to be developed and implemented

The 'What it means for Aucklanders' box could include points on: local access to compost and worm casts, Resilience built into the collection system, economic development and community building opportunities, links with food resilience and local food production.

Plastics

We support the ambition to go beyond diversion to focus on reducing plastic waste (action 4.5).

It would be good to include the 'source reduction' language in the description of Action 4.5 as it is more specific than 'reduction' which often gets used to describe diversion and overlooks prevention.

The definition and discussion of plastics needs to be expanded to include both whole plastic items and microplastics. Recent research shows 3 million bottles worth of microplastics fall in rain onto Auckland each year. Products containing plastic/synthetic polymers and fibres (especially those that contribute microplastic pollution, such as furniture/carpets) need to be treated as part of the plastics priority waste streams.

Advocacy for a suite of regulatory and legislated solutions for plastic items and microplastics is a critical action for council that needs to be specifically captured under the product stewardship actions.

Action 6.4 needs to include a reference to plastics and packaging. Suggest amending the last part of 6.4 to read '... organics and/or that represent significant economic, environmental and social costs such as overreliance on single use packaging, plastic and microplastic pollution and textiles. Advocacy for a strong Global Plastics Treaty is an important element in this.

Auckland Council has an important role to play in advocating to the Central Government for an ambitious Global Plastics Treaty. This could be included in Action 4.5 or as a separate line in Action 6.4.

Packaging

We support packaging being included in the 5 priorities.

Packaging coming into the market imposes cost and management burdens on councils, ratepayers and households and creates environmental impacts across the supply, use, recovery and disposal chain.

Strong advocacy by Auckland Council to the Government to implement tools and regulations that prevent and reduce the use of chemical contaminated packaging, non recyclable packaging and the overreliance on single disposable packaging is critical. Both plastic and packaging need to be specifically referenced in Action 6.4 to create a link between these two.

Council investment in raising awareness about packaging issues will help build informed public opinion to support regional and national changes to business models and packaging design as well regulation and legislation in support of low waste low emissions outcomes.

New solutions for reusable packaging are coming on stream and some of these require a city wide focus to make them viable and practical e.g. this reusable cup take back scheme in Denmark

<https://www.tomra.com/en/news-and-media/news/2024/tomra-launches-system-for-reusable-take-away-packaging> .

Action 4.6 practical action to support businesses across the city that are bringing practical reusable and alternative solutions to the market is an important action.

(See the Advocacy section of our submission for comments which overlap with this.)

Textiles

We support including textiles in the 5 priority products.

Textiles are a significant waste stream and awareness around the global and local issues with fast fashion and microplastic generation from washing fabrics made from plastics is growing rapidly. It is good to see the link being made between the waste (tonnes) and supply chain and landfill emissions generated across the textile life cycle. Textiles have a high emissions to weight ratio.

The textiles workstream has been framed up too narrowly which makes the large volume of textiles coming through the commercial and industrial channels invisible. Domestic textiles, clothing and fast fashion are only a small fraction of the textiles flowing through our economy.

The focus needs to be broader to include commercial and industrial textiles, including corporate/public sector uniforms, linen from accommodation providers and large public facilities like prisons and hospitals etc. As well as streams that will flow through refit, construction and demolition processes like carpets, curtains and furniture. There are good opportunities for the council to work with the large organisations that generate bulk flows of textile waste to reduce and or divert it.

Action 4.8 Textile waste behaviours needs to be expanded out to include business and industry in the target audience. It also needs to cover supporting the development of Textile Product Stewardship and exploring the opportunity to reduce commercial and industrial textile waste streams.

New Zealand organisations like UsedFULLY textilereuse.com are leading work to develop effective product stewardship for textiles as well as downstream markets for source separated waste textiles. Partnering with UsedFULLY would be a good first step to enable action in the commercial and industrial space.

Bio-solids

We support the use of biosolids being used beneficially, in culturally appropriate ways including working with mana whenua, communities and stakeholders to develop future solutions.

We note that where sewage is combined with trade waste there is a high risk that the resulting 'biosolids' will be contaminated by toxic substances that are not suitable for application to land. Globally we are seeing a shift to try and allocate liability to the source provider of the material in places where contamination of land by forever chemicals like PFAS is being identified.

These issues of toxicity and liability need to be part of the inquiry work done around future solutions for biosolids.

Controls, bans and restrictions on upstream inputs need to be carefully considered. Where biosolids have been tested and are non toxic alternative treatment options like biochar filtration are worth exploring especially in smaller communities where industrial trade waste is less of an issue.

Insinkers and inbuilt waste disposal units are problematic because they feed clean organic material and food scraps into a low grade likely to be contaminated sewage/trade waste stream. It is important that the council continues to raise awareness about the impacts of using these and the resulting downcycling of easily compostable material. Adding clean volumes to a contaminated waste stream adds cost and risk to the city's waste management system.

2D: Product stewardship

Advocating to central government for a beverage container return scheme (CRS) and other mandatory product stewardship schemes is a key priority action within the draft WMMP. The CRS will ensure containers are returned for re-use and recycling instead of littering roadsides and waterways. This and other product stewardship schemes will shift the cost of waste disposal from ratepayers to producers, manufacturers and consumers, and drive higher rates of reuse and resource recovery. See section 5 of the Snapshot document.

What do you think of these priority areas?

Support Do not support Don't know

Tell us why

We support Priority 6 Advocacy for actions to move up the waste hierarchy. We are 100% in support of the intention to Advocate "for actions to move up the waste hierarchy, including source reduction, reuse and right to repair".

I/We would like to see *even more* direct actions, monitoring and reporting indicators, methods of assessment, and specific targets which help define, drive and measure progress towards source reduction embedded in this WMMP.

Priority 6 (or 7) needs to be expanded to specifically include other tools and economic instruments that can be used to drive change e.g. Table 1, line 6 include “Advocate to all sectors for actions, *economic instruments*, policy and regulation.....”. An action needs to be added to the list on p 68-69 that relates to the use of economic instruments to drive change up the hierarchy. (See Priority 7 commentary below for more discussion on this).

This includes waste disposal levies, single use packaging taxes, advance disposal fees. They sit alongside product stewardship schemes and help make them effective. International evidence shows that packages of tools and regulations are needed to drive change. There is no silver bullet.

Moving up the waste hierarchy will require good coordination across the four overarching key priority groups: empowering iwi and community partnerships, targeting specific activities and materials, advocacy for future action and delivering direct action.

It is important that the language/terminology and content of the high level key priority descriptors in Table 1, goals and objectives, the actions and the commentary in the WMMP are well aligned so they support one another and nothing falls between the cracks. The final edit of the WMMP needs to pay close attention to this. We have made suggestions for minor changes to wording clauses etc throughout our submission to support this.

We want to see Council maximise promotion, support and advocacy for source reduction measures like redesign, reuse and repair across the board.

This includes:

In Construction and Demolition and the five priority waste streams.

As a core focus of working relationships with Mana Whenua and community partners in behaviour change organisations as well as across the resource recovery network.

As a central element in criteria for procurement decision making.

Action 6.2 needs to include requirements for source separation to support making high quality raw materials available for reprocessors and composters. This is a critical element for ensuring a strong and stable resource recovery sector with viable onshore reprocessing options..

See plastics section of this submission for comments on expanding Action 6.4 Priority Waste Advocacy regarding inclusion of plastics and microplastics, overreliance on single use packaging, advocacy for a strong global plastics treaty.

We support Priority 7 advocacy for a Container Return Scheme for drink containers and other mandatory product stewardship.

We suggest shifting to using the terminology Deposit Return scheme for drink containers instead of container return scheme. This wording makes it easier for users to see the connection between the deposit - and the return of their deposit when they return the drink container. It can also be universally used for other products e.g. deposit return for electronics, deposit return for mattresses etc.

Product stewardship and economic instruments are the tools that create the revenue flows we need to fund reuse and recycling systems. Using economic instruments like levies, advance disposal fees, deposit return systems and user charges is common in other countries we trade with. This creates the revenue required to fund capex and opex to build a strong stable reuse and resource recovery sector.

There is increasing pressure on council budgets and ratepayers to fund resource recovery activities. Government needs to create other methods of resourcing capex and opex by establishing packages of economic instruments and the regulation and legislation necessary to bring product stewardship (or extended producer responsibility) to life.

Councils, communities, small businesses and households can do a lot to drive zero waste transformation. But big businesses/industry and Government are the ones with the power to pull the big levers.

Businesses and industry can develop new business and service models, put better designed products on the shelves and fund effective reuse and recovery systems for the products and packaging they choose to put into the market.

Government can create a regulatory framework that establishes the rules of engagement so that funding, processes, and compliance, monitoring and enforcement are aligned with waste and emissions reduction goals.

It is critical that Council advocates strongly for the Government to step up and establish the regulatory framework that underpins effective reuse and resource recovery systems.

We fully support strong advocacy for the implementation of an effective Container Return Scheme under Action 7.1

Implementing the container return scheme will help fund the transition to more effective recycling systems. The handling fee would shift the capex and opex cost of recycling drink containers off ratepayers and councils. The deposit - return gives businesses and individuals an extra reason to recycle the drink container.

The Container Return Scheme is a good stepping stone towards large scale, nationwide product stewardship schemes. It is also a better way to recycle drink containers:

- Everybody loves it – 98% of the responses to the 2022 Government consultation were in support.
- It works – high return rates, high quality recycling, low litter, proven results in many countries over decades.
- It pays for itself – covers all the real costs of recycling so we don't have to use rates budgets to subsidise drink container recycling.
- It sets us up with infrastructure – establishes a nationwide network of take-back sites that can also be used by emerging Reuse and Refill business models.

Creating deposit return systems so that items have a value at the end of their life has multiple benefits. This means the last user of the product can redeem the deposit which creates an incentive for people to recycle items that may otherwise be disposed of or lost into the environment as litter and pollution.

Deposit return schemes for drink containers are a good example of how this works. A 20c deposit is paid by the person who buys the drink, they get this back when they recycle it. Any one who finds the drink container lying around can claim the deposit if it is littered, and Councils can use the deposits to cover the cost of public space bin collections and kerbside collections.

Action 7.1 needs to include advocacy for the central government to put the National Investigation of Reusable Beverage Packaging back into the MfE work plan. This was progressing but got cut at the same time as the CRS went into the policy bonfire in Feb 2023. Beverage packaging is a key opportunity area for expanding reusable packaging, and we don't want to miss the opportunity the CRS presents to increase both reuse and recycling.

Just having mandatory or voluntary product stewardship schemes in place will not guarantee good outcomes, they also have to be well designed schemes that serve the public interest.

Action 7.2 and 7.3 both need to include a second element - Advocacy to central government and other stakeholders for better, more transparent and democratic/participatory processes for designing product stewardship schemes that are robust, ambitious and serve the public interest.

Current schemes are industry focused and this often means the organisations that created the problem in the first place and benefit from the status quo are in charge of coming up with solutions. This approach is unlikely to result in ambitious change that serves the public interest. Properly internalising costs that are being pushed out onto society and our environment is not in the company's best interest.

Many of the current systems for recovering end of life packaging and products are green wash activities. They are underfunded 'token gestures' with a low return rate and a large amount of promotional fanfare. Real solutions follow the waste hierarchy. Shifting to a circular economy means we have to rethink and redesign products and business models. Legislation, regulation and

policy need to incentivise reuse, refill, durability and repair in order to reduce single use packaging and create long lasting, non toxic products.

Real solutions focus investment and innovation at the top of the waste hierarchy and clearly signal the direction of travel. Real solutions are:

- Safe for people ecosystems and climate
- Viable because they build in ways to cover the real costs
- Accessible to everyone
- Regenerative because they leave things better than they were before.

This thinking needs to be built into the design of the new regulatory framework, the tools and the systems and processes we use to harvest products and materials so we can keep them in circulation for as long as possible.

2E. Litter and illegal dumping

Addressing litter and illegal dumping to protect public health and the environment includes advocating to central government for better legal tools (e.g. instant fines) to deal with litter and collaborating with communities on local solutions for hot spot areas. See section 6 of the Snapshot document.

What do you think of these priority areas?

Support Do not support Don't know

Tell us why

We support Priority 11 to address litter and illegal dumping. The Council protects our environment and keeps people safe by providing public litter and recycling bins, picking up litter and illegal dumping and running effective compliance, monitoring and enforcement systems as described in the action plan.

We agree that other important actions in this space are:

- Education to support Aucklanders to understand the impacts of litter, hazardous chemicals and materials and the flow on environmental effects of microplastics.
- Supporting organisations who focus on advocacy, education, citizen science and other practical actions to raise awareness and do practical clean ups.

We think advocacy needs to be specifically included in the litter actions list to harness the power of upstream measures to prevent and reduce litter alongside the downstream measures outlined in Action 11.3.

Table 1 row 11 needs to include a point about this as well.

Issues with litter and illegal dumping can be effectively targeted by working to reduce the upstream causes. Advocacy and support for new funding methods, collection methods, product and business and service model design are the key to reducing our litter and dumping problems in the medium to long term.

For example:

Reducing the amount of single use, disposable packaging for food and drinks which is commonly littered.

Creating deposit return systems so that items like drink containers have a value and are likely to be recycled or picked up and returned if they do get littered.

Putting advance disposal fees in place means the end of life cost for recycling and safe disposal are
Establishing effective funding and collection methods for larger items like mattresses, tyres and e-waste will reduce illegal dumping and stockpiling.

The ability for households to pay for, and access waste management and resource recovery services is also a critical factor. It is good to see there are methods in the plan to support large households to manage their rubbish, recycling and food scraps.

Cost of living means some households struggle to pay for the basics like safe methods of rubbish disposal. Low income households are often at the end of the use chain for products because they need to buy second hand or cheap brands. These are likely to have a shorter life and the household has to pay for disposal each time they replace the item.

The responsibility for end of life disposal falls on these people who are least able to pay the cost of either safe disposal or user pays recycling fees collected at the end of life. Some households will struggle to manage the logistics having no trailer or ute to take items to the transfer station or resource recovery centre.

The evolution of the Inorganics collection through action 2.4 is an important way to support these households.

Access to a local Community Resource Recovery Centre is a key element in giving all households options for properly disposing of waste, returning end of life products like electronics, batteries and packaging and taking surplus reusable household items, textiles and building materials so they can be on-sold or donated to households that can make good use of them.

Question 3

The Hauraki Gulf Islands Waste Plan has been developed as an appendix to the draft WMMP in recognition of the unique nature of waste management and minimisation on the islands.

See section 4 of the Snapshot document, and the HGI Waste Plan 2024-2030.

The plan includes goals and actions for waste management and minimisation on these islands.

Which Island do you want to comment on?

- Aotea/Great Barrier
- Kawau
- Rakino
- Waiheke

Tell us why or tell us how we can improve this section.

Question 4

Any other comments?

Q3 is island specific so we are including general comments on Draft Hauraki Gulf Islands Waste Plan 2024 here.

We support the approach being taken to develop a plan which serves the needs and aspirations of the residents living on the islands. The partnership between council and island communities is based on a shared kaupapa underpinned by a recognition of the impacts of waste on the environment and the communities. Key community and Māori outcomes can be achieved through work to prevent, reduce and recover products and materials so that they do not become waste.

We support the intention to subsidise services on the islands, visitors contribute to demand for both waste and resource recovery services on the islands. We agree that reducing waste at source to eliminate the cost and risks associated with managing waste at the end of its life makes good sense for island communities. Community led solutions are likely to be effective in smaller, geographically isolated communities where social norms can be shifted more quickly.

It is important that Council supports the island communities to implement solutions that reduce the amount of material needing to be shipped off the islands. This will require funding and other mechanisms. The status quo option of transporting volumes of waste and recycling off the islands has a cost and where solutions can be found to avoid these costs it makes sense to resource these solutions to at least the level of the avoided transport and other costs.

It would be useful to explore opportunities for linking resource Recovery on the Islands with Community Resource Recovery Centres onshore. For example Kawau is close to Mahurangi Wastebusters and has a ferry service linking the two communities. They could develop mutually beneficial working relationships.