

New Zealand Waste Data Framework: Consultation on Definitions and Protocols

In Partial Fulfilment of Milestone Three of the
National Waste Data Framework Project

For the
Ministry for the Environment
Waste Minimisation Fund Project 608

Acknowledgements

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Executive Summary

Consultation on the draft definitions and protocols for the National Waste Data Framework comprised:

- Four workshops
- An online webinar
- An online survey through SurveyMonkey with links e-mailed to all WasteMINZ members.
- Information on the WasteMINZ website
- An information session at the WasteMINZ Mid-year Roundup

20 people attended the workshops and online webinar, 24 people responded directly to the survey with a further 3 e-mailed responses, and approximately 50 people attended the Mid-year roundup information session.

The majority of the substantive feedback focused on particular elements of the Framework, and there was little comment on the overall structure of the Framework or how well this might succeed (or not) in capturing the necessary data. In general, the picture that emerges from the responses is that the protocols are capable of doing the job for which they are designed—albeit with some minor suggestions for improvement.

Key messages to emerge from respondents' feedback included the following:

- Respondents felt that the right data will be gathered by the protocols. It will generally be sufficiently accurate and complete with no significant gaps or overlaps (with overlaps being identified by some respondents as useful for cross-checking the data)
- The roles and responsibilities are clear, although not everyone agrees with the proposed roles, most notably that central government does not have a specific role
- There were a number of suggestions for minor improvements but no suggestions for major improvement
- There were mixed views about how easy the protocols were to follow, but the majority indicated they were 'easy' or 'OK' to understand. A number of the comments provided suggest that communication of the protocols is likely to be vital in facilitating their widespread uptake.
- There were some concerns raised by a few respondents regarding commercial confidentiality and the burden placed on commercial operators
- The protocols are generally seen to be functional. None of the feedback suggested a more functional alternative
- All TAs indicated they will definitely use or be likely to use all the protocols
- The definitions are considered to be clear, and cover the terms required, although some minor modifications may need to be made to a few definitions.
- There was no strong preference for how the Framework should be implemented. The strongest support was for TAs having responsibility while the lowest level of support was for TAs delegating responsibility to regional councils.

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1 Introduction

This report has been prepared in partial fulfilment of Milestone Three of the Waste Minimisation Fund-supported and WasteMINZ-led National Waste Data Framework Project. Milestone Three represents the completion of the third stage of the four-stage project to develop a National Waste Data Framework.

The information gathered and presented as part of the fulfilment of Milestone One helped inform an understanding of what waste data is required by the key stakeholders, what waste-related information is currently gathered, how this information is used, and the potential future waste data needs of key stakeholders.

For Milestone Two, a set of proposed draft definitions and protocols for gathering information within a National Waste Data Framework was prepared. The definitions and six protocols covered the collection and sharing of data on waste disposed of to levied disposal facilities and information on waste services and facilities. Roles and responsibilities of different sectors of the waste industry were outlined in the protocols. The protocols identified territorial authorities, through the Waste Minimisation Act-mandated waste assessment procedure, as playing a central role in the collection of waste data.

This Milestone Three report summarises the results of the consultation phase of the project, which took place from 1 April to 11 May 2015. For the consultation, the draft definitions and protocols developed for Milestone Two were circulated to key stakeholders and the wider waste industry for feedback. Details of the consultation programme are provided in Section 2.

1.1 Background

It has long been recognised, across central government, local government, and the waste industry, that the lack of good quality, consistent waste data prevents the public and private sectors in New Zealand from effectively planning, monitoring, and reporting on waste issues and developing and prioritising appropriate solutions. The 2010 *New Zealand Waste Strategy - Reducing Harm, Improving Efficiency* recognises that “the lack of data about waste hampers our ability to plan appropriate activities to improve waste management and minimisation”.

There have been a number of efforts over the years to address the issue of compiling and managing waste data. These include efforts by the Ministry for the Environment (MfE) to establish a Waste Data Network in 2002-3 and the MfE-funded development by WasteMINZ of the Waste and Recycling National Reporting model. Although there has been some progress in improving waste data over the years – for example through the Online Waste Levy Reporting System (OWLS), and through reporting of territorial authority (TA) waste levy spending, none of the efforts to date have resulted in a working national system of waste data measuring, recording, and reporting that provides the information needed by central and local government and industry.

In July 2013, WasteMINZ applied to the Waste Minimisation Fund for funding to develop a National Waste Data Framework (the Framework). Funding approval for the project was received in April 2014. The aim of the project is to develop a “flat pack” implementation plan containing all the elements required to establish a Framework. The implementation plan will establish the definitions, protocols and responsibilities required to make the Framework operative and are being developed in conjunction with key stakeholders from the solid waste and resource recovery sector.

Key stakeholders in the project are considered to be those responsible for generating and reporting waste data, those responsible for compiling and managing the information, and the parties that will use the data. Those identified as being key stakeholders include:

- MfE
- Statistics New Zealand (Stats NZ)
- regional authorities
- territorial and unitary authorities
- waste industry and community operators
- research and consulting organisations.

2 Consultation Methodology

2.1 Consultation Objectives

The objectives of the consultation undertaken for Milestone Three were to determine:

- whether the draft protocols would gather the necessary information for waste to disposal facilities and on waste and diverted materials services and facilities
- whether the draft protocols would provide accurate and consistent data and whether there would be significant gaps or overlaps in the data
- how easy the draft protocols are to follow
- whether the roles and responsibilities of the key parties are clear and reasonable
- how likely TAs would be to use the protocols
- whether commercial waste operators would encounter difficulties in implementing the protocols
- whether the terms and definitions in the protocols are clear and functional
- the merits of the implementation pathways described in the protocols
- any other issues not addressed adequately by the protocols.

In order to address these objectives, a multi-faceted consultation programme was developed. Each of the elements of the consultation programme is described in the following subsections.

2.2 Consultation Programme & Response

Consultation on the draft definitions and protocols for the National Waste Data Framework comprised:

- Four workshops, in Christchurch (15 April 2015), Wellington (13 April 2015), and two in Auckland (14 April 2015). One of the two Auckland workshops, intended for commercial industry representatives only, was cancelled due to a lack of enrolments. Invitations to the workshops were distributed electronically by WasteMINZ to all its members.
- An online webinar (14 April 2015) for those unable to attend one of the workshops. The webinar was held in conjunction with the Auckland workshop.
- An online survey through SurveyMonkey. Links to the online survey were distributed electronically by WasteMINZ to all its members.
- Information on the WasteMINZ website
- An information session at the WasteMINZ Mid-year Roundup (23 April 2015)

2.2.1 Online Survey

Information regarding the online survey was promulgated by WasteMINZ through emails to members and information and links on its website. The email to members is presented in Appendix 4 and the website information in Appendix 5.

The online survey attracted 24 online responses and 3 email responses. The quantitative results of the online responses are summarised in Section 3. Substantive responses to open-ended questions in the online survey are contained in Appendix 6 through Appendix 50. The email responses are included in Appendix 51. In all instances, identifying details have been removed from the responses to ensure the confidentiality of the respondents.

The online survey form is provided in Appendix 1.

2.2.2 Website

Information regarding the consultation programme was promulgated by WasteMINZ through emails to members and information and links on its website. The email to members is presented in Appendix 4 and the website information in Appendix 5.

2.2.3 Workshops

Four workshops were planned: in Christchurch (15 April 2015), Wellington (13 April 2015), and two in Auckland (14 April 2015). One of the two Auckland workshops, intended for commercial industry representatives only, was cancelled due to a lack of attendees.

An online webinar (14 April 2015) was also scheduled for those unable to attend one of the workshops in person. The webinar was held in conjunction with the Auckland workshop.

Invitations to the workshops were distributed electronically by WasteMINZ to all its members and information was posted on its website. The email to members is presented in Appendix 4 and the website information in Appendix 5.

Twenty people attended the workshops. A list of attendees to the workshops and notes from the workshops are provided in Appendix 2.

2.2.4 Conference Presentation

The 2015 WasteMINZ Mid-year Roundup was held in Auckland on 23-24 April 2015. A presentation on the National Waste Data Framework was given on 23 April and was attended by approximately 50 conference attendees. The presentation summarised the development of the Framework, outlined the draft protocols, and stressed that the consultation phase of the project was taking place.

2.3 Limitations of Consultation

Six factors that potentially limit the validity of the consultation outcomes have been identified:

- Invitations to the consultation workshops and the online survey were distributed only to WasteMINZ members and identified key stakeholders. This may not be representative of all those for whom the waste data framework is relevant.
- Those who responded to the online survey were self-selecting and may not have been representative of all relevant parties.
- The workshops were held in three centres, but the need to travel to these centres may have been a disincentive to attendance.
- The consultation documents and the actual protocols are relatively technical and do not lend themselves to being comprehended with a quick read. Some of the survey respondents may have based their responses largely on the information within the survey form.
- The online survey was restricted in terms of length and detail by a requirement to keep it short and simple. It was considered that this would maximise the response rate.

The cumulative effect of these factors on the results of the survey has not been assessed.

3 Responses to Online Survey

3.1 Profile of Respondents

A total of 24 responses were received to the online survey. The responses are analysed, in terms of the type of roles which the respondent fulfils, in the table below.

Please indicate if your organisation fulfils any of the following roles? Select all that apply.		
Answer Options	Response Percent	Response Count
Territorial Authority	66.7%	16
Transfer Station operator	33.3%	8
Disposal Facility operator	29.2%	7
Waste collector	20.8%	5
Regional Council	16.7%	4
Central Government	4.2%	1
Research/consulting	12.5%	3
IT service provider	4.2%	1
Commercial enterprise (waste generator)	4.2%	1
Waste equipment/service supplier	0.0%	0
Community organisation	0.0%	0
Product stewardship organisation	0.0%	0
Other (please specify)		4
answered question		24

Of the four organisations in the 'Other' classification, their organisation descriptions were as follows:

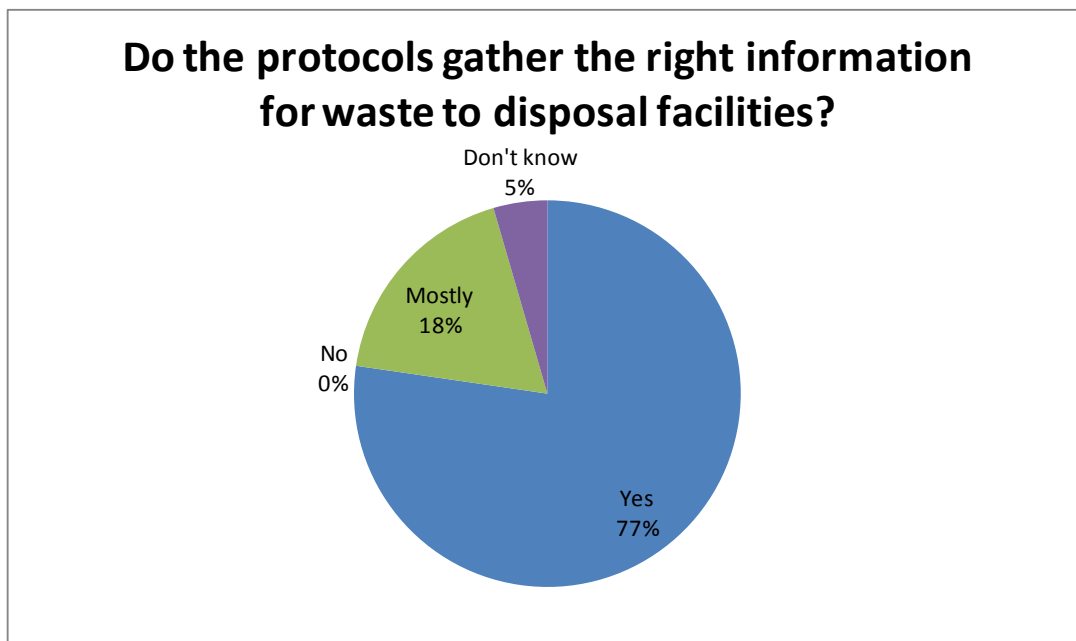
- JV Partner in CCOs (2 respondents)
- Facility owner but not operator
- Waste educator & recycler

The largest respondent group was Territorial Authorities, with disposal facility and transfer station operators both represented by approximately 1/3 of respondents.

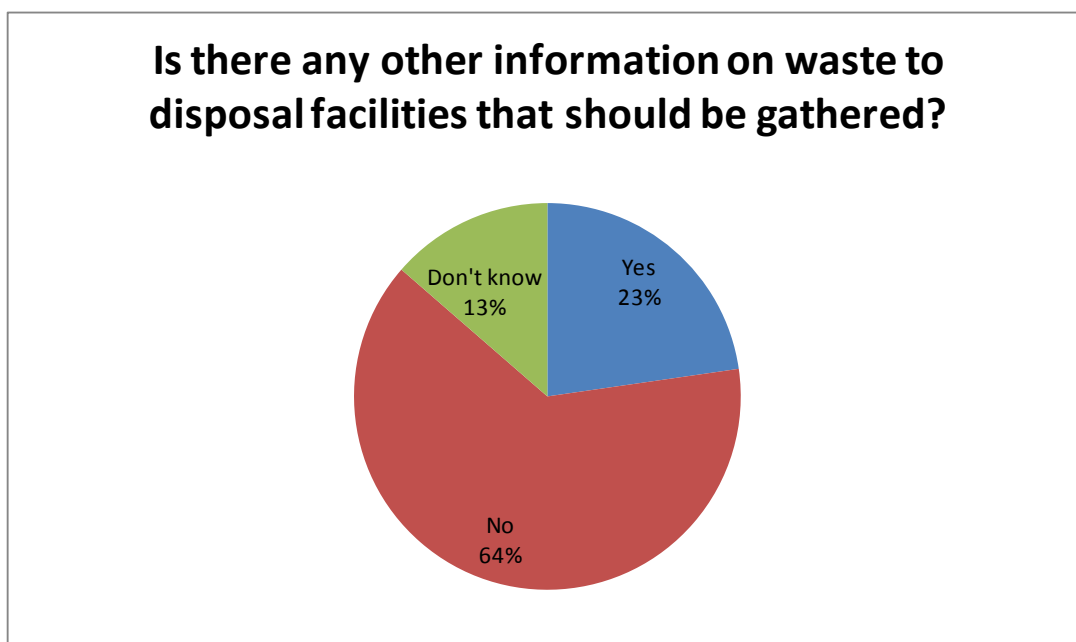
3.2 Definitions and Protocols for Waste to Disposal Facilities

3.2.1 Gathering the right information

3.2.1.1 Survey



95% of respondents felt that the protocols gathered or mostly gathered the right information, while 5% were unsure.



Two thirds of respondents felt that there was no other information that should be gathered, while slightly less than a quarter made suggestions for additional information.

3.2.1.2 Comments

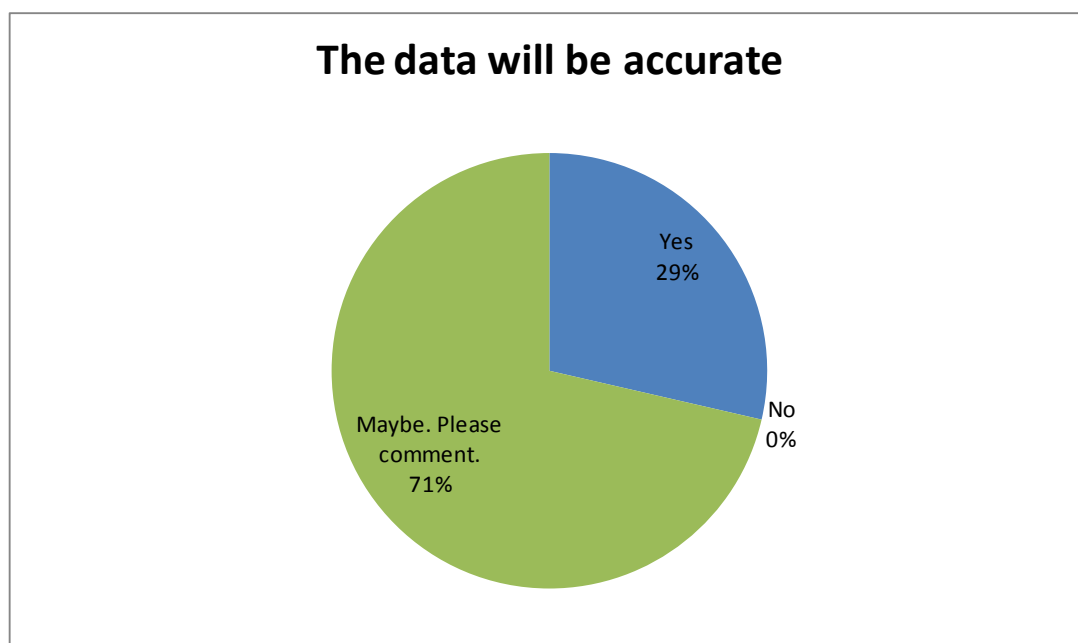
Of the substantive, relevant replies to the question, a majority agreed that the protocols would gather the right information on waste to disposal facilities. One respondent was uncertain, as their organisation has not previously had access to data at this level. Another respondent considered that the information would mostly be relevant to central government. Not all respondents appeared to be cognisant of the process that had led to the development of the protocols.

With regards to the question on what other information could be gathered, separate information on product stewardship priority products, hospitality waste, diverted materials, and UEF classifications were mentioned.

Full text of the substantive replies received in response to this question is in Appendix 6.

3.2.2 Accuracy of information

3.2.2.1 Survey



While no-one thought that the data would not be accurate, a majority (71%) had some level of uncertainty.

3.2.2.2 Comments

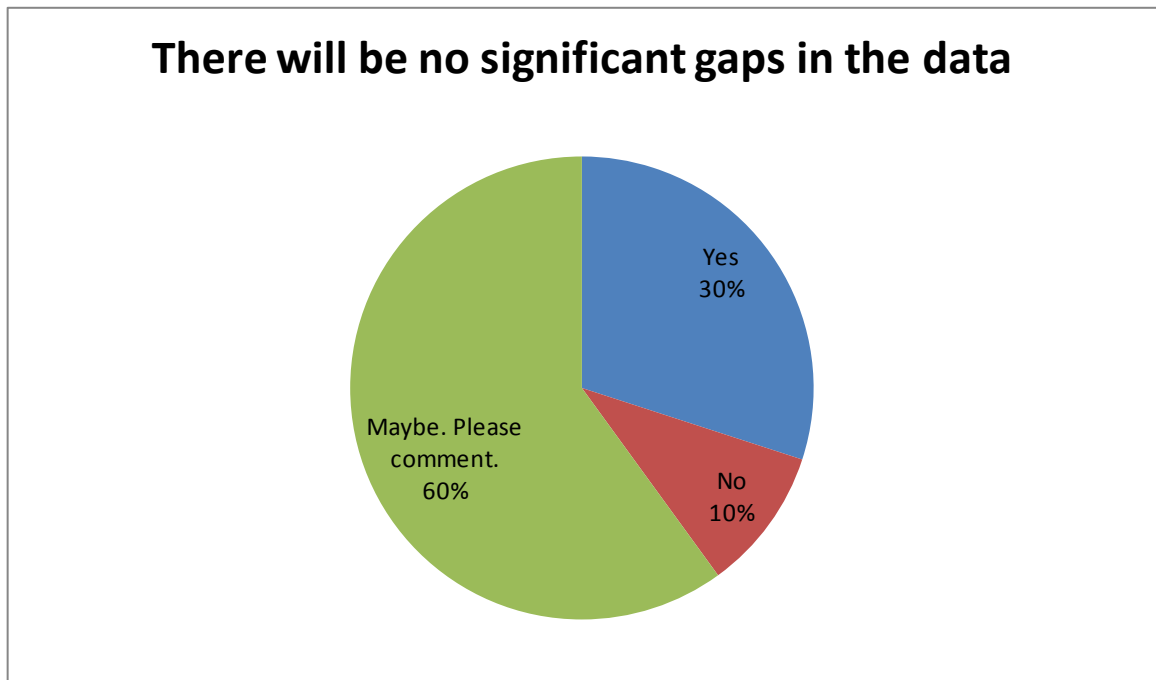
Concerns relating to the accuracy of the data generated by the protocols on waste to disposal facilities included:

- The need for data to be verifiable and auditable
- The effect of the rate of uptake of the protocols by TAs
- The advantage of acquiring data from several sources, which allows cross-checking
- The lack of weighbridges at some facilities
- Possible effects of different methods and abilities of data-gathering, reporting, manipulation, and interpretation by different organisations
- The negative effect of the complexity of the information being sought on accuracy.

Full text of the substantive replies received in response to this question is in Appendix 8.

3.2.3 Data gaps

3.2.3.1 Survey



As for the question regarding accuracy of data, a majority expressed a level of uncertainty as to whether there would be data gaps.

3.2.3.2 Comments

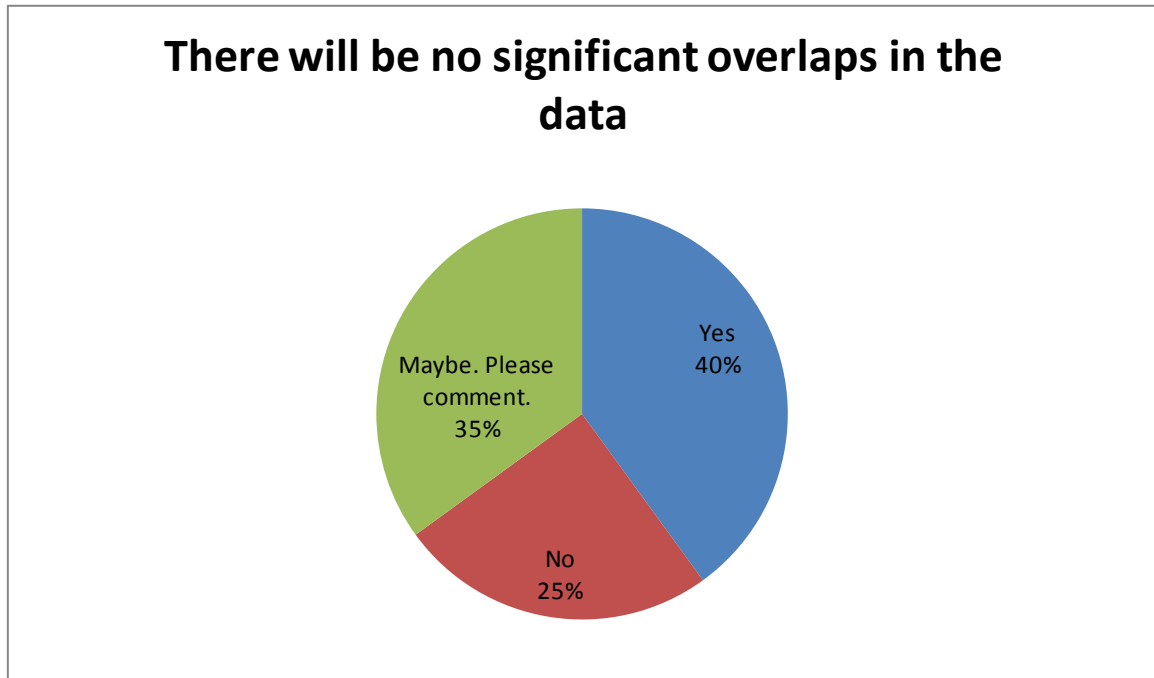
Comments expressed about data gaps created by the protocols on waste to disposal facilities included:

- Identifying all facilities will be a challenge
- How widely the protocols are adopted will affect data gaps
- The protocols' balance between the requirement for detail and expediency is about right.
- Different categorisation and application of the definitions will affect data gaps
- Robust monitoring and/or auditing of the reporting process will affect data gaps
- Table on page 17 refers to "Quantity Out" with regards to Diverted Materials at Disposal Facilities. This should be amended to read "Quantity".
- Data gaps may decrease over time as operator categories are amended and staff educated.
- The voluntary nature will lead to data gaps as it will not be universally-adopted and may lead to sub-optimal reporting.

Full text of the substantive replies received in response to this question is in Appendix 9.

3.2.4 Data overlaps

3.2.4.1 Survey



Respondents were reasonably evenly split regarding the potential for overlaps.

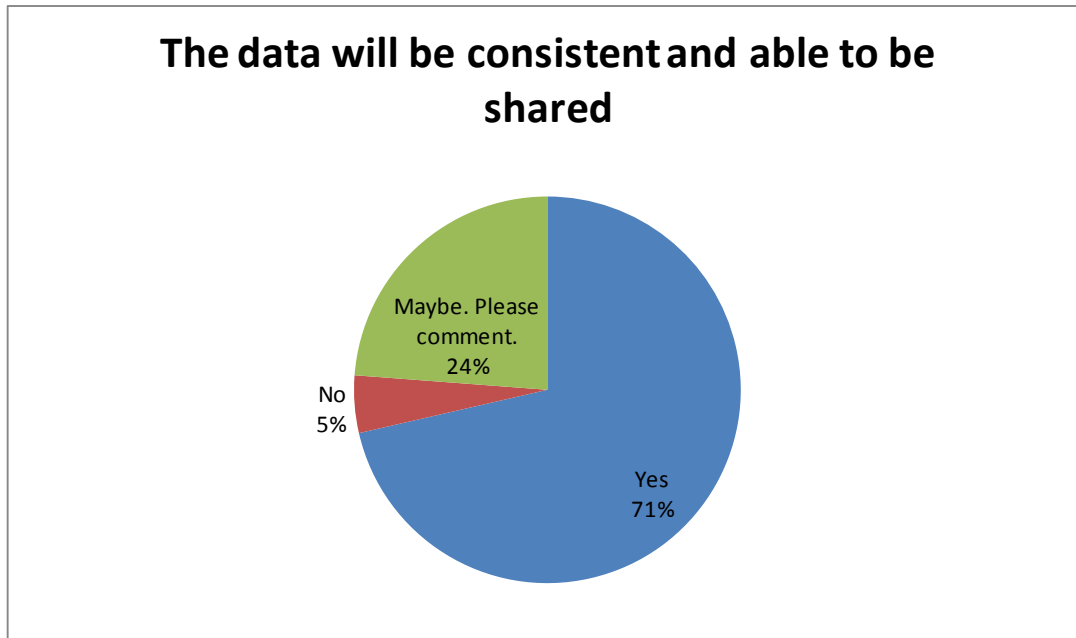
3.2.4.2 Comments

Ten respondents made comment on this question. Substantive responses related to data overlaps included several pointing out that data overlaps are useful and needed for mass balances. Reconciliations and sense checks were mentioned as ways to eliminate double-counting.

Full text of the substantive replies received in response to this question is in Appendix 10.

3.2.5 Consistency of data

3.2.5.1 Survey



The majority of respondents (71%) felt that the data proposed to be gathered by the protocols would be consistent and able to be shared, while approximately a quarter had some level of uncertainty.

3.2.5.2 Comments

Issues raised regarding the consistency of data generated by the protocols on waste to disposal facilities and whether it would be able to be shared included:

- The MfE taking a lead role or a central data collector being created would ensure consistency
- Commercial sensitivities must be mitigated if data is shared
- A consistent definition for “waste collectors” should be provided to ensure consistency
- Consistent use of the protocols will lead to consistent data and should lead to reliable national data
- The information is commercially-sensitive and must not be shared, particularly as many councils are trade competitors.
- Data is more likely to be consistent than currently, but benefits are uncertain.

Full text of the substantive replies received in response to this question is in Appendix 11.

3.2.6 Other comments

Other comments on the definitions and protocols for waste to disposal facilities included:

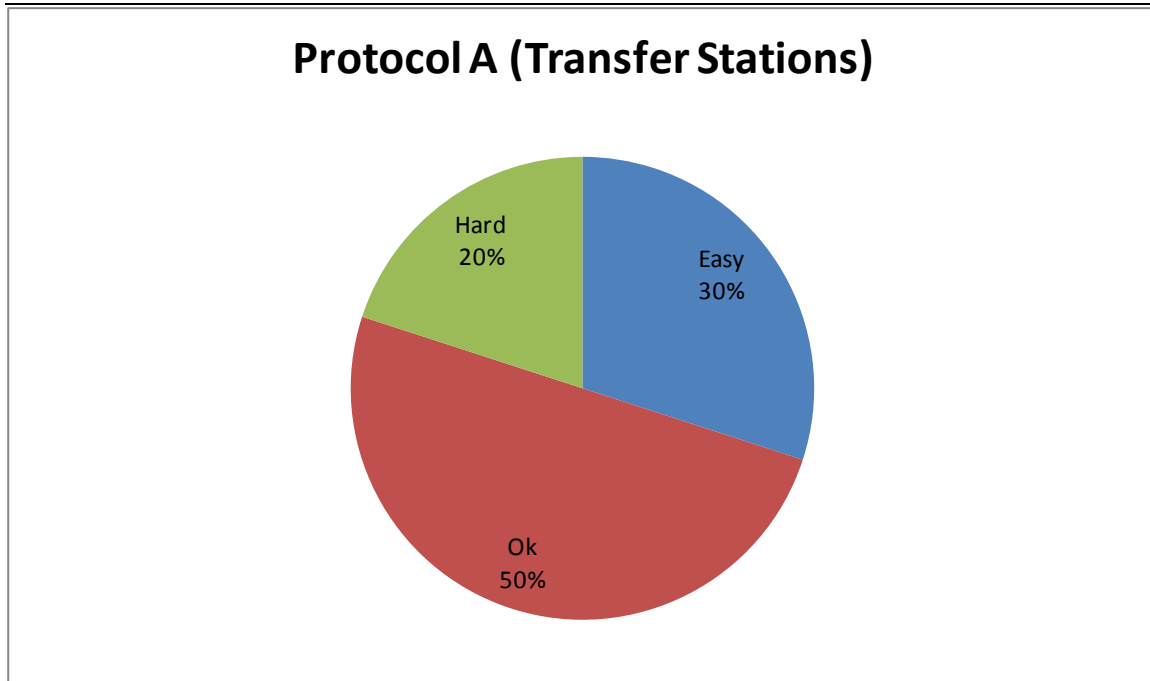
- Further clarification is needed on what is a “regular basis” for reporting, storage aggregation and release of data, definitions of “significant proportion” for geographic source, and categorisation of litter, illegal dumping, and product stewardship waste.
- “Excellent thought through and well-delivered”
- One respondent questions whether WasteMINZ was representing all of its stakeholders and that central government should lead if there is a national need.
- “Potentially a huge step forward!” if the Framework is widely adopted.

Full text of the substantive replies received in response to this question is in Appendix 28.

3.2.7 Protocol A – Transfer Stations

3.2.7.1 Easiness to follow

3.2.7.1.1 Survey



80% of respondents thought that the protocols would be either easy to follow or OK to follow.

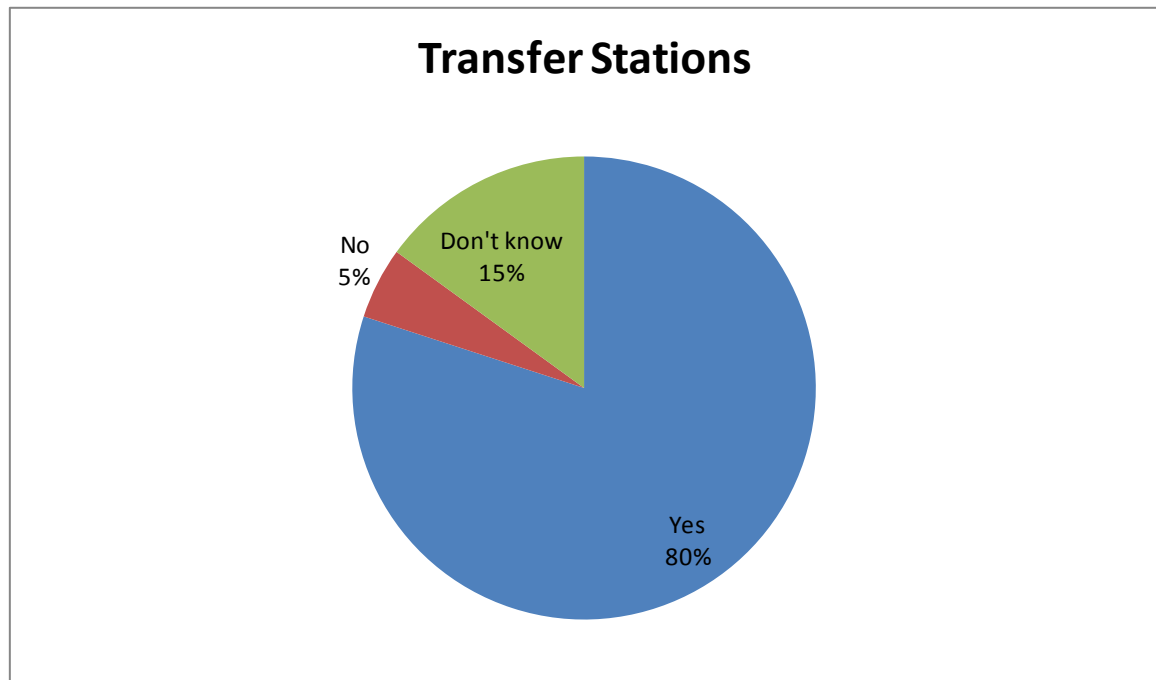
3.2.7.1.2 Comments

One respondent who provided a substantive answer considered the protocols appeared straightforward and easy to follow and another found it to be “theoretically easy to understand”. There appeared to be some confusion amongst other respondents as to whether “easy to follow” meant “easy to implement” or “easy to understand”. Several of the comments related to implementation problems. These respondents considered the protocols would be “hard” to “follow”.

Full text of the substantive replies received in response to this question is in Appendix 12.

3.2.7.2 Roles and responsibilities

3.2.7.2.1 Survey



80% of respondents felt the roles and responsibilities for Transfer stations were clear, while 15% were unsure.

3.2.7.2.2 Comments

The roles and responsibilities are considered clear by two respondents but potentially not reasonable. Confidentiality concerns and the voluntary nature of the Framework are mentioned.

Full text of the substantive replies received in response to this question is in Appendix 20.

3.2.7.3 Possible improvements

3.2.7.3.1 Comments

There were five responses suggesting possible improvements to the protocol. A threshold for what is considered 'more than negligible' out-of-district' waste is suggested, as was a national data repository. The lack of weighbridges and software at a high proportion of transfer stations was mentioned.

Full text of the substantive replies received in response to this question is in Appendix 16.

3.2.7.4 Difficulties putting into practice

3.2.7.4.1 Survey

Five respondents answered this question, with three indicating there was not anything they would have difficulty putting into practice and two suggesting there would be.

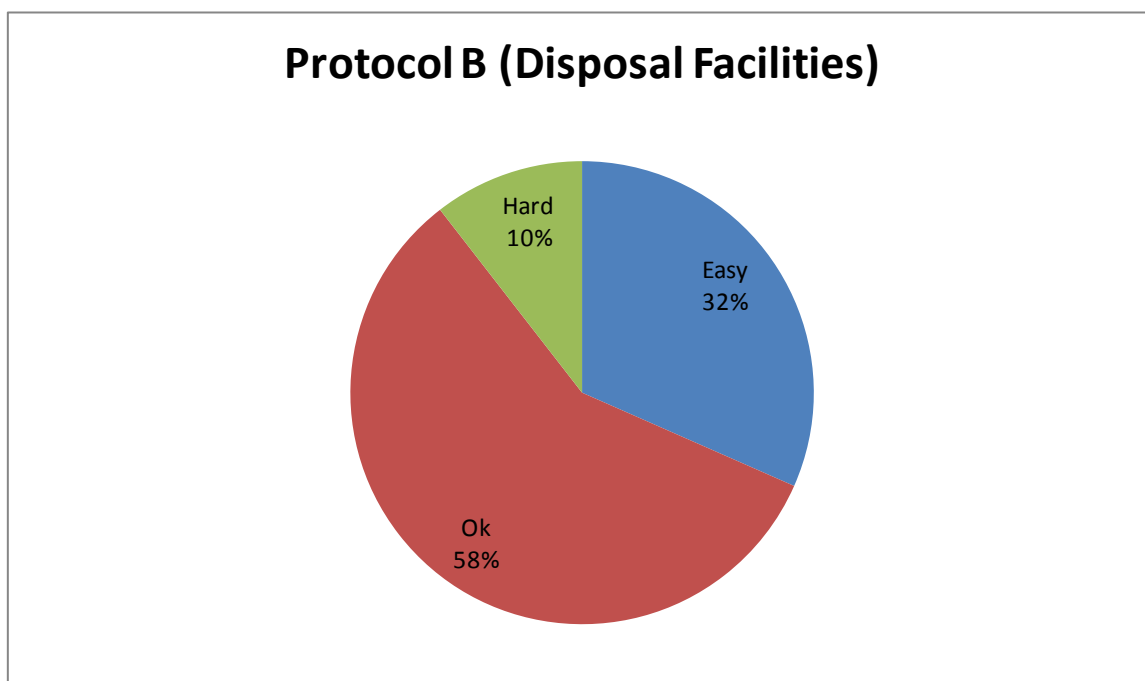
3.2.7.4.2 Comments

There were two comments on this question. One respondent raised the issue of commercial confidentiality, while the other indicated that tonnage data would be difficult to provide. Full text of the substantive replies received in response to this question is in Appendix 25.

3.2.8 Protocol B – Disposal Facilities

3.2.8.1 Easiness to follow

3.2.8.1.1 Survey



90% of respondents thought the disposal facilities protocol would be either easy or OK to follow.

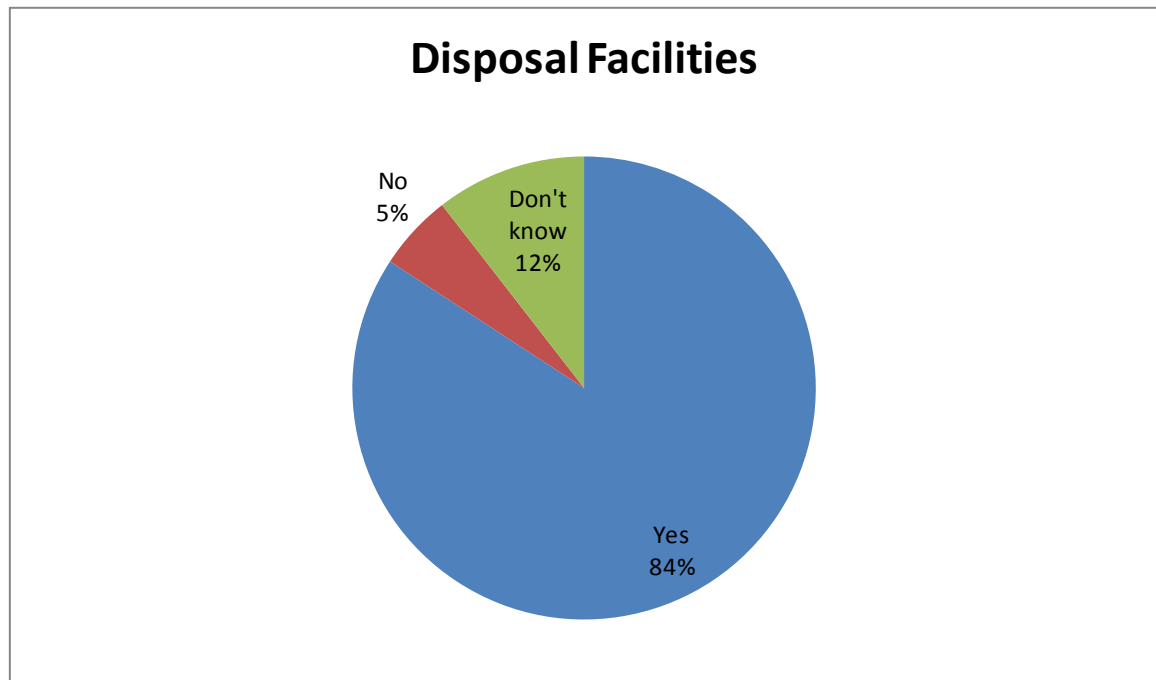
3.2.8.1.2 Comments

One respondent who provided a substantive answer considered the protocols appeared straightforward and easy to follow and another found it to be “theoretically easy to understand”. As with the responses to the corresponding question for Protocol A, there appeared to be some confusion amongst other respondents as to whether “easy to follow” meant “easy to implement” or “easy to understand”. Several of the comments related to implementation problems. These respondents considered the protocols would be “hard” to “follow”, particularly around the collection of geographic source information.

Full text of the substantive replies received in response to this question is in Appendix 13.

3.2.8.2 Roles and responsibilities

3.2.8.2.1 Survey



3.2.8.2.2 Comments

Concerns relating to the confidentiality of data and the lack of incentive for private operators to participate were raised.

Full text of the substantive replies received in response to this question is in Appendix 21.

3.2.8.3 Possible improvements

3.2.8.3.1 Comments

A threshold for what is considered 'more than negligible' out-of-district' waste is suggested. The effort that would be needed for disposal facilities to report under two different systems (OWLS and the Framework) was pointed out. The respondent considered that diverted materials used for landfill cover were not covered by the Framework.

Full text of the substantive replies received in response to this question is in Appendix 17.

3.2.8.4 Difficulties putting into practice

3.2.8.4.1 Survey

Five respondents answered this question with four indicating there was nothing they would have difficulty putting into practice and one saying there was.

3.2.8.4.2 Comments

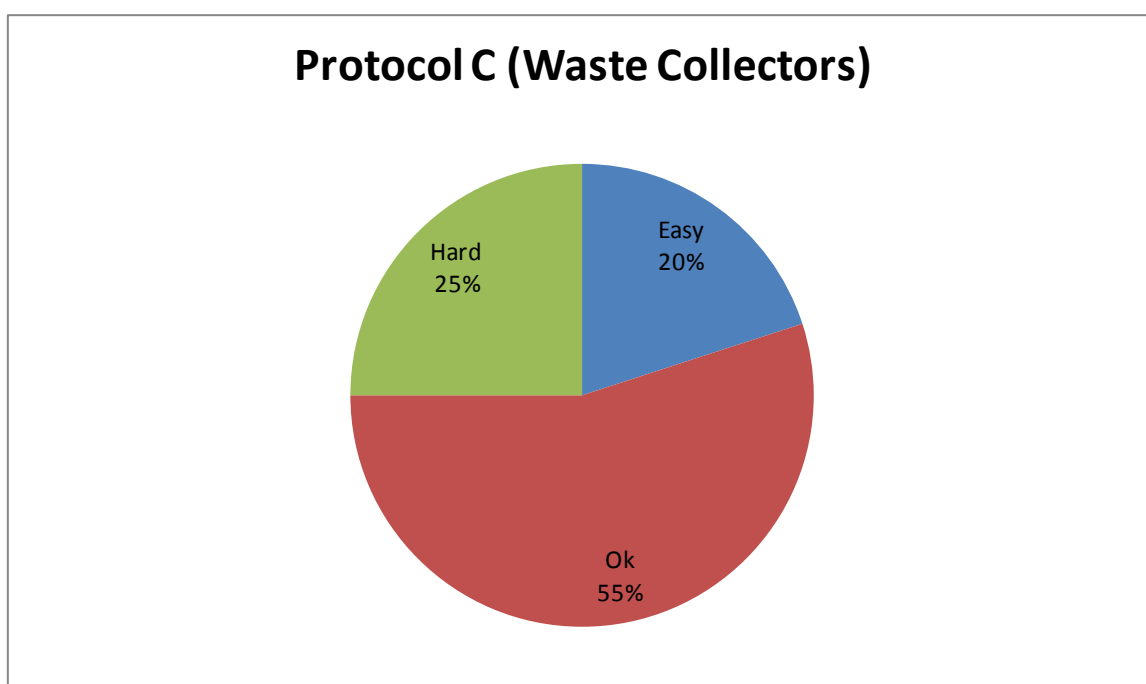
A respondent mentioned problems with the collection of geographic information from waste collectors and general users. Double-counting of waste collector tonnages was also identified as an issue that needed addressing. The issue of the cost incurred by operators to provide information was also raised.

Full text of the substantive replies received in response to this question is in Appendix 26.

3.2.9 Protocol C – Waste Collectors

3.2.9.1 Easiness to follow

3.2.9.1.1 Survey



The waste collector protocol was seen by respondents as being slightly harder than the transfer station and disposal facility protocols, with more people (25%) suggesting it would be hard, than thought it would be easy (20%).

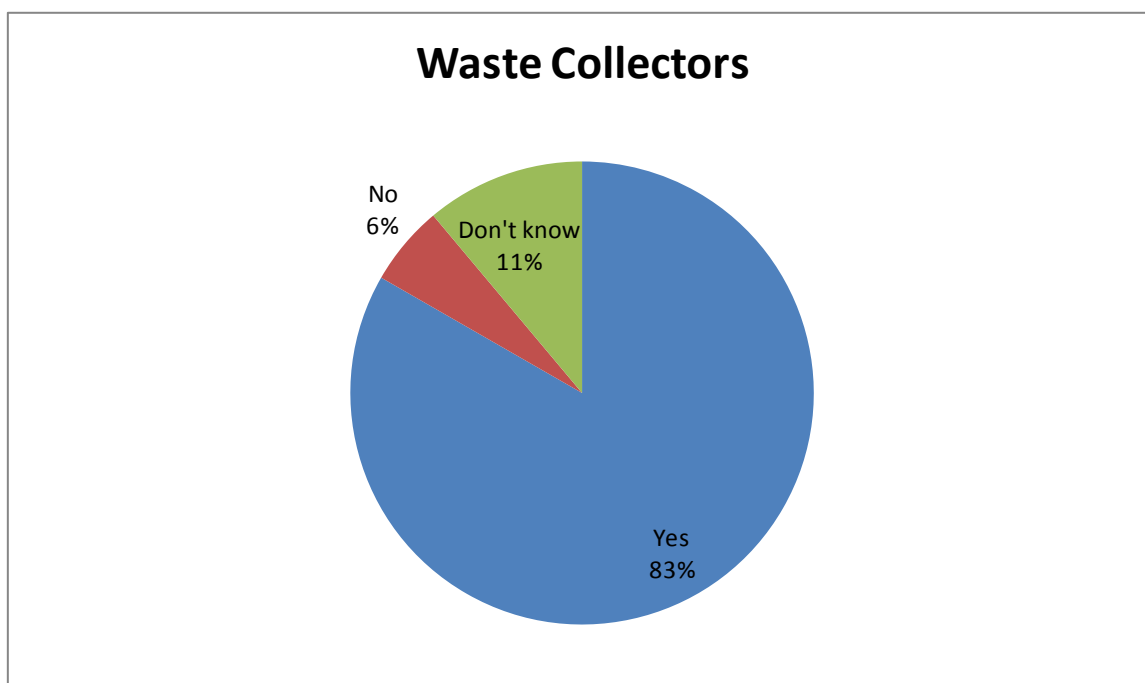
3.2.9.1.2 Comments

As with the corresponding questions relating to the other protocols, there was some confusion as to whether the question related to the comprehension or implementation of the protocol. The amount of effort required, bringing collectors “on board”, and estimating various waste types were all considered to be problematic.

Full text of the substantive replies received in response to this question is in Appendix 14.

3.2.9.2 Roles and responsibilities

3.2.9.2.1 Survey



The majority of respondents (83%) felt that the role and responsibilities of waste collectors is clear.

3.2.9.2.2 Comments

A consistent national approach to the definition of “Waste Collectors” is identified as a possible improvement. One respondent felt that the role was “clear, but not reasonable” as collectors would be required to provide commercially valuable information and potentially have to pay a license fee to do so.

Full text of the substantive replies received in response to this question is in Appendix 22.

3.2.9.3 Possible improvements

3.2.9.3.1 Comments

A threshold for defining “waste collectors” was mentioned by two respondents. Another respondent agreed that waste collectors should be the primary source of data but pointed out the weakness of the Framework if it were to be voluntary rather than mandated.

Full text of the substantive replies received in response to this question is in Appendix 18.

3.2.9.4 Difficulties putting into practice

3.2.9.4.1 Survey

Three waste collectors answered this question. Two of the respondents indicated there were no issues with putting the protocols into practice and one operator indicated that there would be.

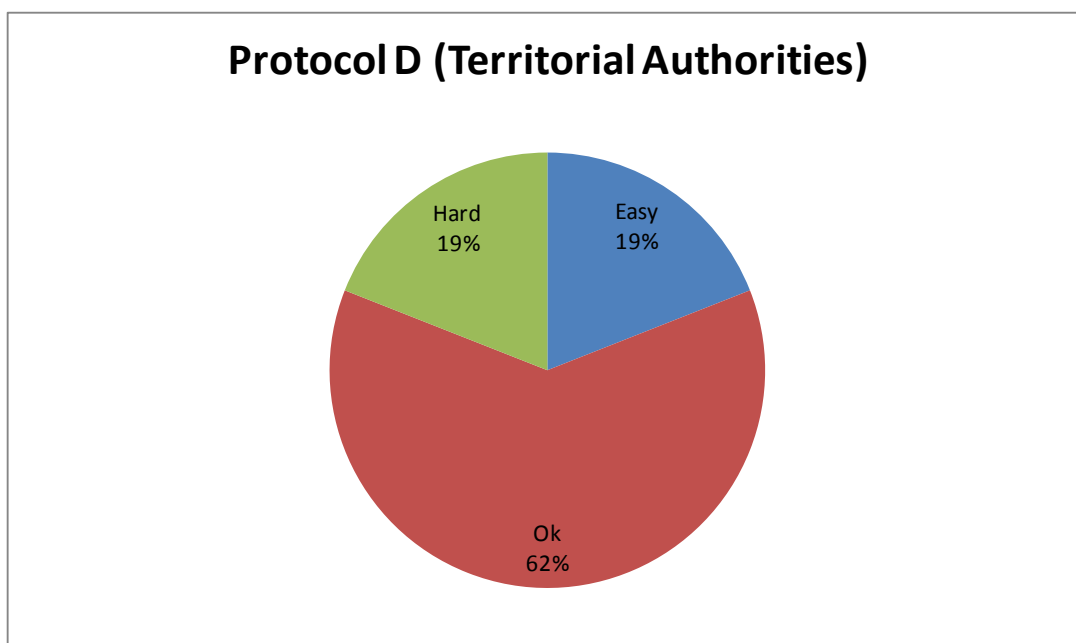
3.2.9.4.2 Comments

Only one comment was received on this question which raised a number of points including the cost for operators to provide information and commercial confidentiality. Full text of the substantive replies received in response to this question is in Appendix 27.

3.2.10 Protocol D – Territorial Authorities

3.2.10.1 Easiness to follow

3.2.10.1.1 Survey



Responses on how easy the TA protocols would be to follow were evenly split, with equal numbers suggesting it would be hard as thought it would be easy. The majority, however, (62%) felt it would OK.

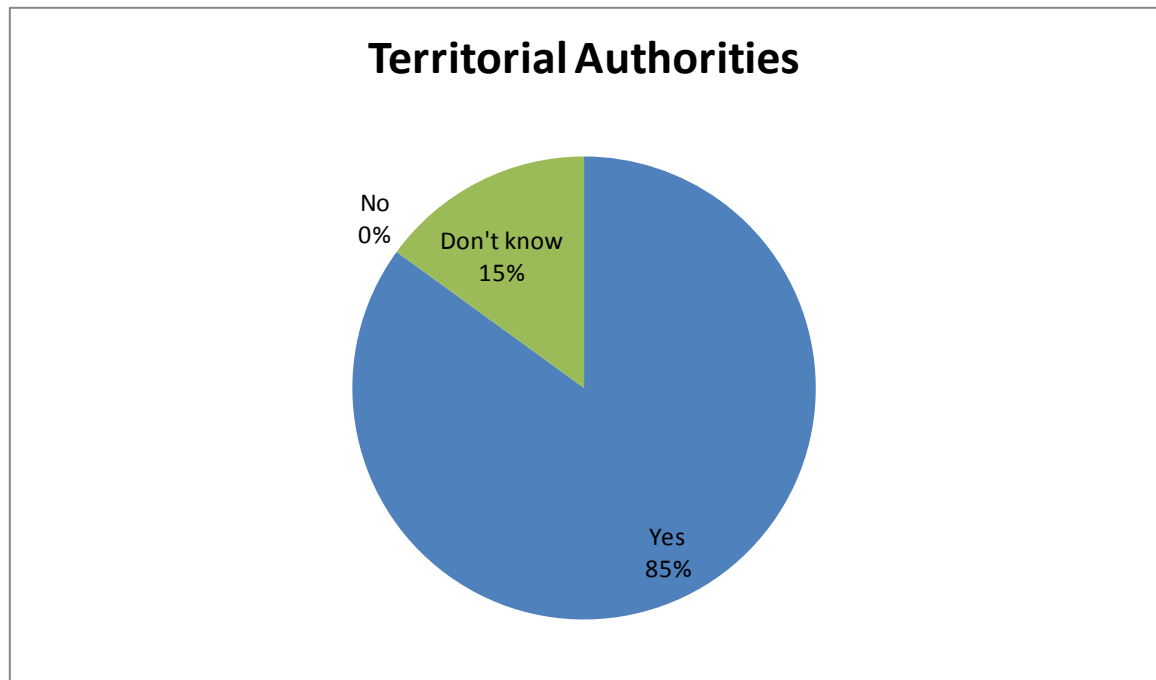
3.2.10.1.2 Comments

As with the corresponding questions relating to the other protocols, there was some confusion as to whether the question related to the comprehension or implementation of the protocol. Difficulties with implementing the protocol that were mentioned included the “huge amount of effort” required and some collection contracts not providing the necessary level of details. Another respondent had concerns about the granularity of data that would be required and double-counting of data. One respondent considered that the aggregation rules would benefit from being illustrated with examples as well as being explained.

Full text of the substantive replies received in response to this question is in Appendix 15.

3.2.10.2 Roles and responsibilities

3.2.10.2.1 Survey



85% of respondents felt the roles and responsibilities of TAs are clear in the protocol, while no respondents felt they were unclear.

3.2.10.2.2 Comments

No comments were made on this issue.

3.2.10.3 Possible improvements

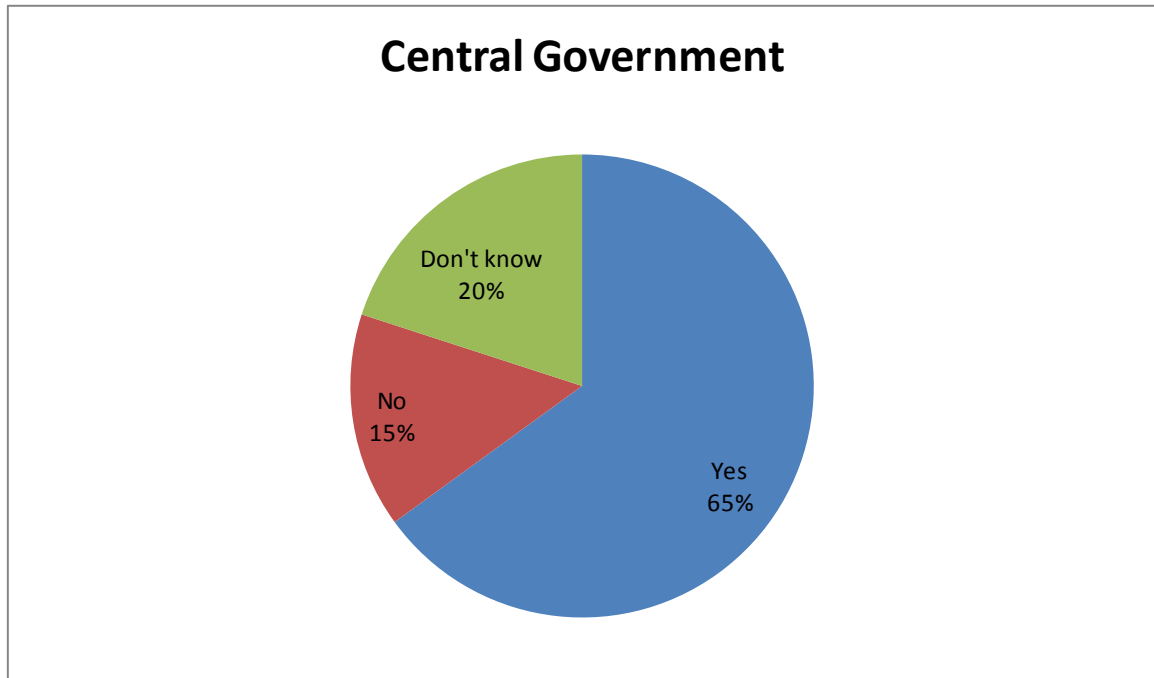
3.2.10.3.1 Comments

More specific guidance on waste composition was suggested by two respondents. A need for better guidance for TAs regarding data integrity and commercial confidentiality was identified and a suggestion made that this could be done on a national level. Specific questions relating to more information on geographic sources, vehicle load weights, and particular materials are put forward.

Full text of the substantive replies received in response to this question is in Appendix 19.

3.2.11 Roles and Responsibilities for Central Government

3.2.11.1 Survey



The majority of respondents (65%) felt that Central Government's role was clear, while 20% were unsure.

3.2.11.2 Comments

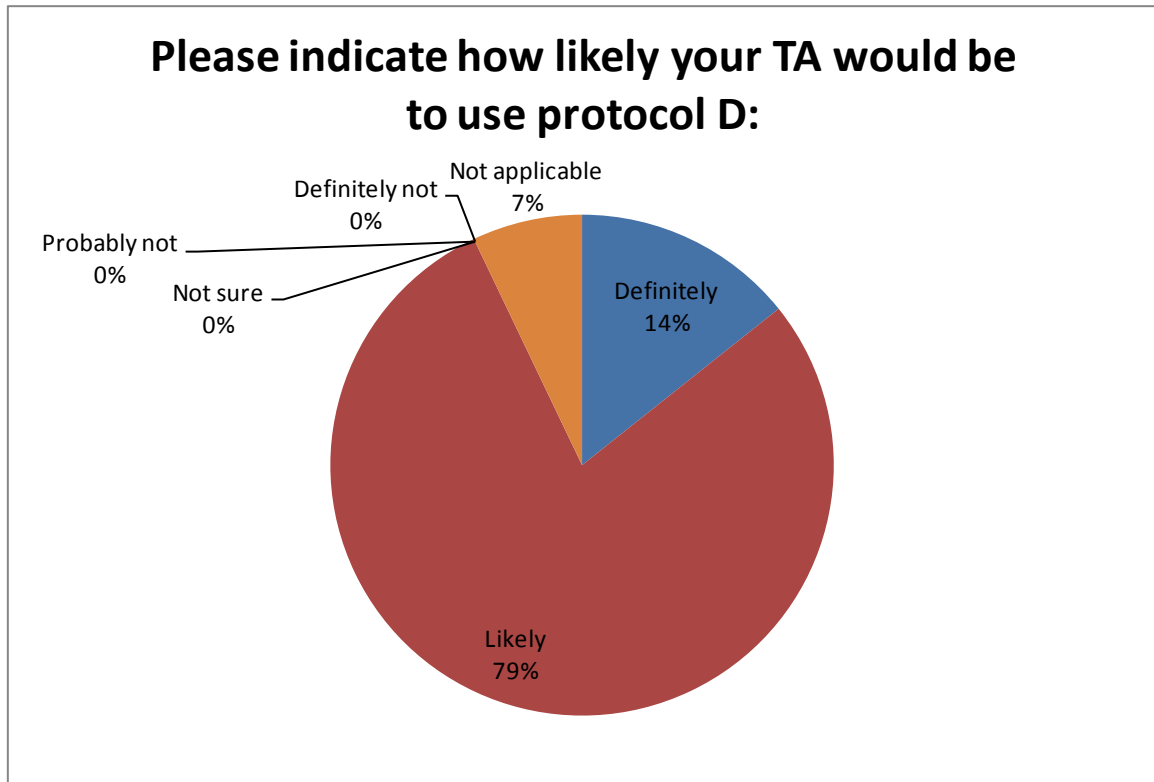
Respondents to this question considered the role of central government to be clearly identified in the protocols. All of the respondents questioned why the role of central government was so limited. Comments included:

- It is a shame they are not pursuing a national waste data collection system
- Central Government will be one of the main users of waste data yet don't want to participate at this stage
- Whenever there is an element of voluntary data capture, New Zealand will never have a complete uptake of the Framework
- Central government needs to mandate a national waste data system.

Full text of the substantive replies received in response to this question is in Appendix 23.

3.2.12 TA Uptake of Protocol D

3.2.12.1 Survey



93% of respondents indicated they would definitely or likely make use of the protocol. The only respondents who did not say they would indicated the protocol was not applicable.

3.2.12.2 Comments

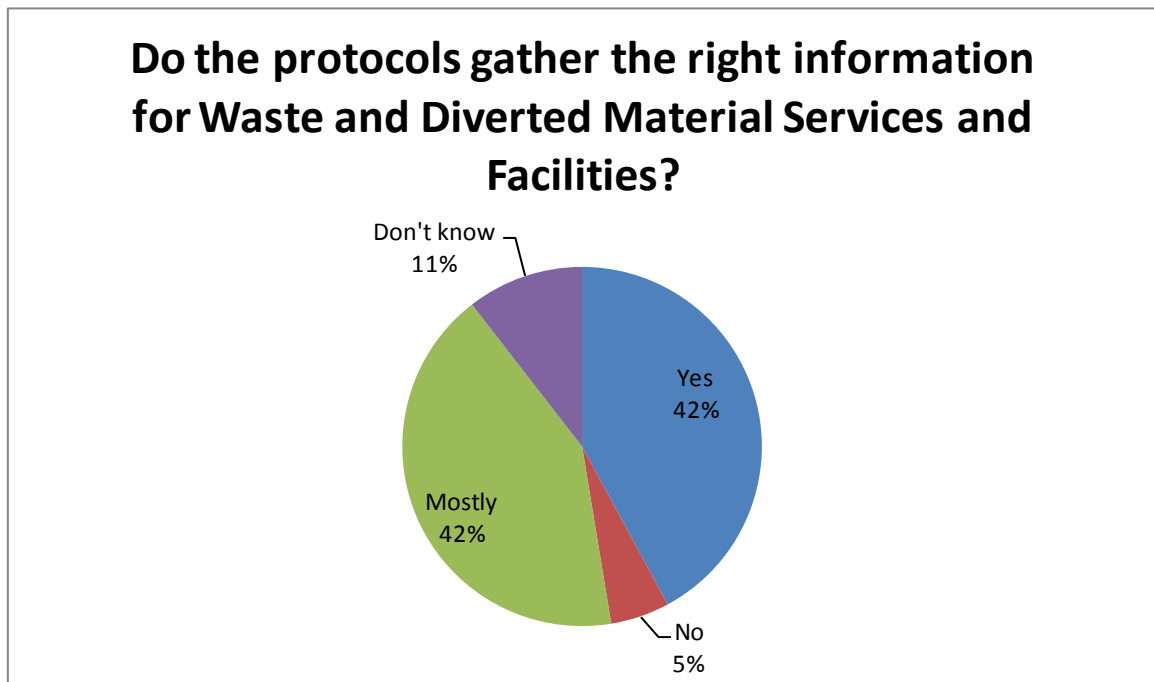
The respondents who provided substantive commentary on this question either already had such a system in place or were in the process of doing so.

Full text of the substantive replies received in response to this question is in Appendix 24.

3.3 Definitions and Protocols for Information about Waste and Diverted Material Services and Facilities

3.3.1 Gathering the right information

3.3.1.1 Survey



84% of respondents felt these protocols do or mostly do gather the right information on waste and diverted material facilities. Four respondents indicated that there was additional information the protocols should aim to capture.

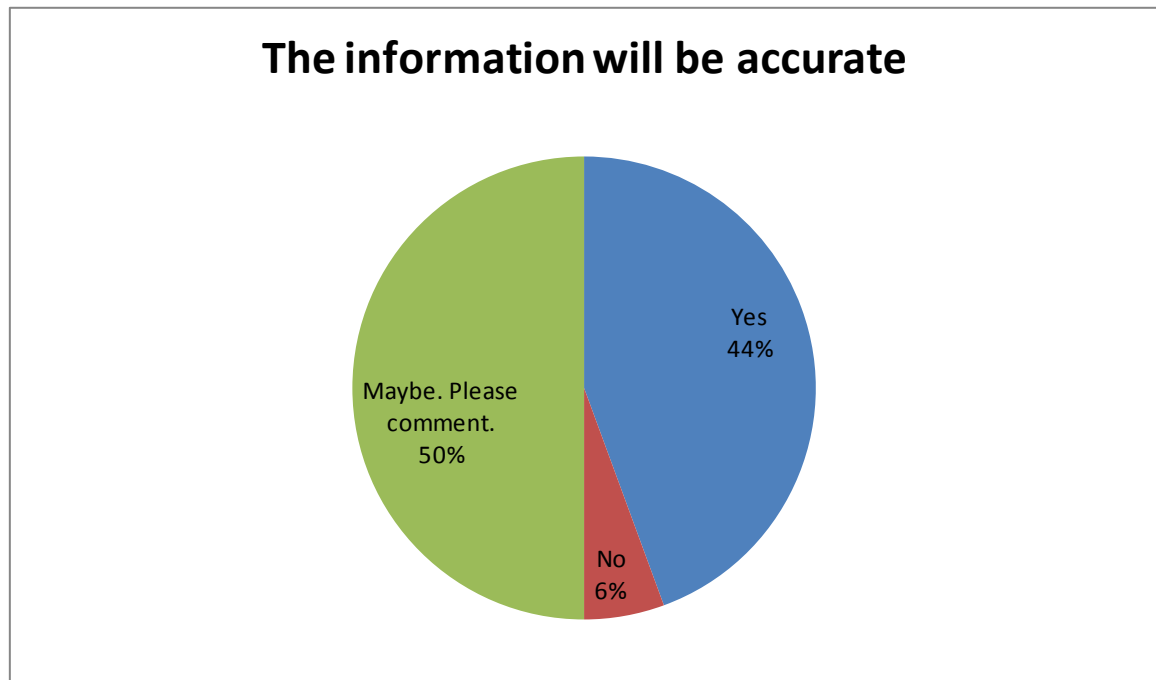
3.3.1.2 Comments

Several of the responses appeared to misunderstand the intent of the question or the focus of the protocols. Two respondents considered the protocols to be a good start on the process of gathering the relevant information.

Full text of the substantive replies received in response to this question is in Appendix 29.

3.3.2 Accuracy of information

3.3.2.1 Survey



Half of the respondents indicated some level of uncertainty about whether the information sought by the protocol would be accurate, while 44% thought it would be and 6% thought it would not be accurate.

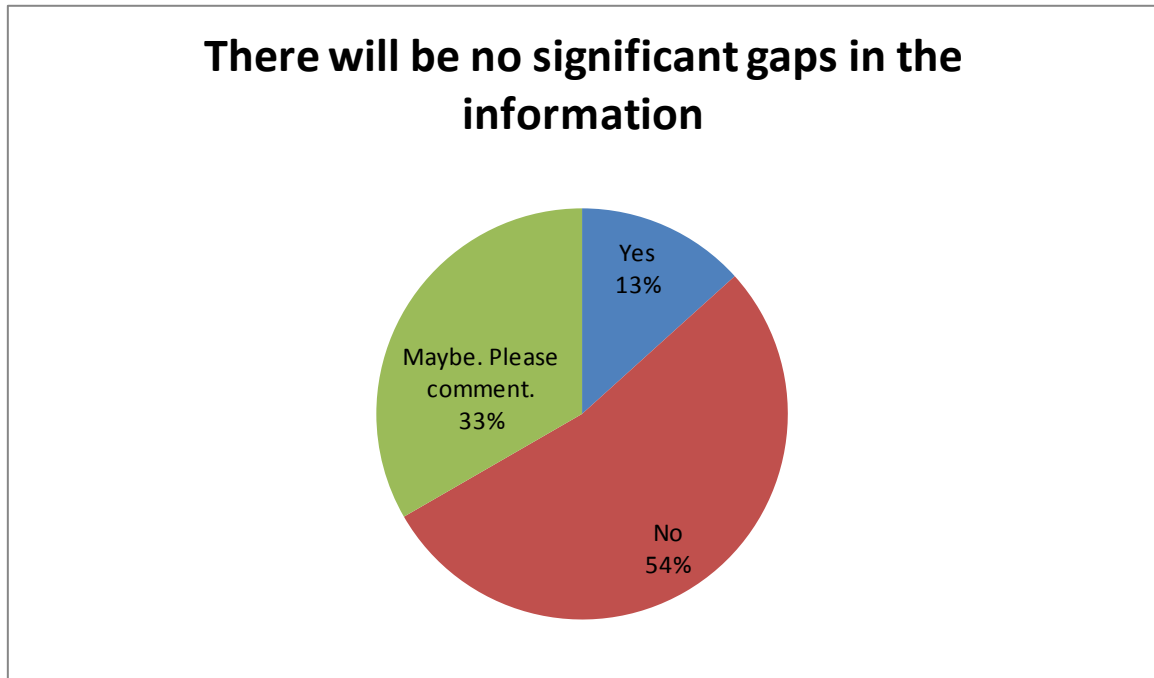
3.3.2.2 Comments

All of the respondents identified the primary relationship between the application of the protocols by TAs and the resulting accuracy of the data.

Full text of the substantive replies received in response to this question is in Appendix 31.

3.3.3 Data gaps

3.3.3.1 Survey



There seemed to be some overall concern that there may be gaps in the information provided.

3.3.3.2 Comments

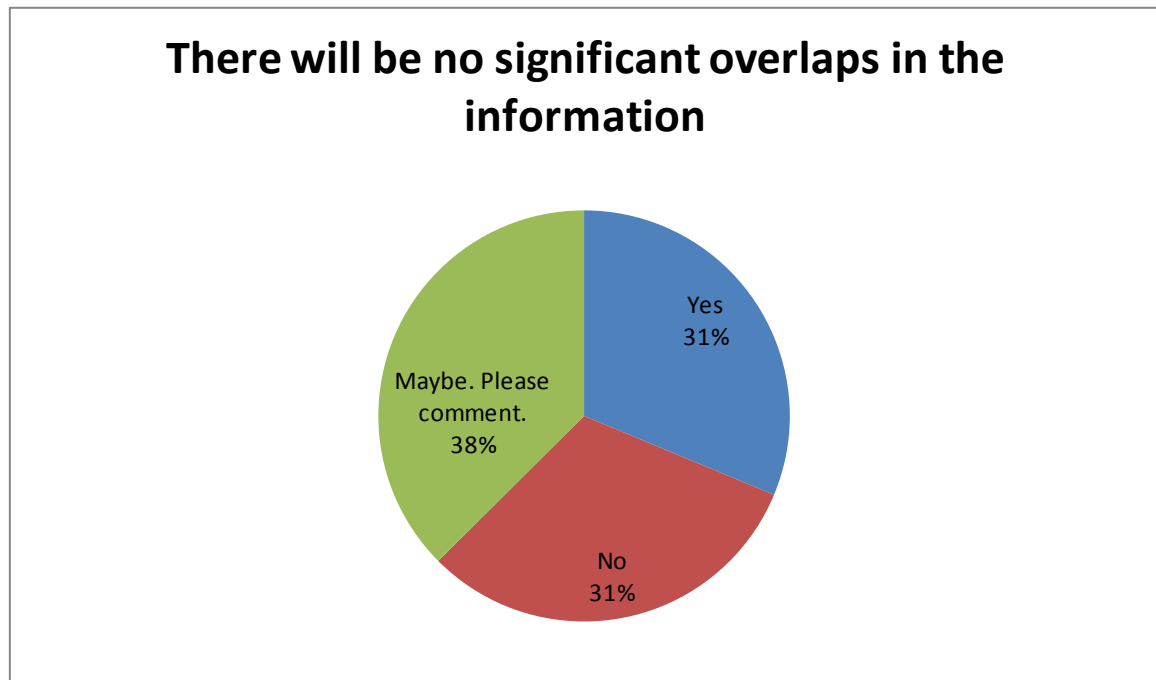
Possible risks for there being data gaps included:

- Difficulty in obtaining comprehensive information from collectors and facilities
- How widespread adoption of the Framework is will determine completeness of national dataset
- Level of buy-in and integrity of the operators

Full text of the substantive replies received in response to this question is in Appendix 32.

3.3.4 Data overlaps

3.3.4.1 Survey



There was no conclusive view regarding the potential for overlaps, with equal numbers answering yes or no and a further third uncertain.

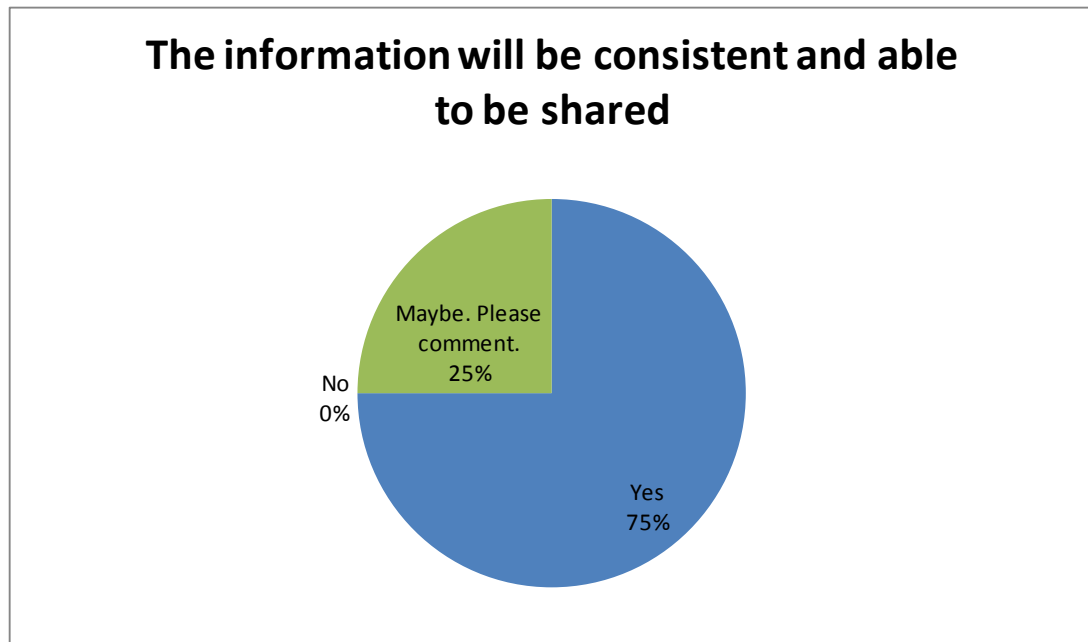
3.3.4.2 Comments

Two respondents recognised data overlaps as being necessary for cross-checking of data and producing mass balances. Concerns were raised over services and facilities that operate across several districts, making it difficult to eliminate overlaps. Entities that provide both 'services' and 'facilities' were identified as an issue that might lead to double-counting.

Full text of the substantive replies received in response to this question is in Appendix 33.

3.3.5 Consistency of data

3.3.5.1 Survey



Three quarters of respondents felt the information sought will be consistent and able to be shared with the remaining quarter expressing some level of uncertainty. No respondents felt the information would not be consistent.

3.3.5.2 Comments

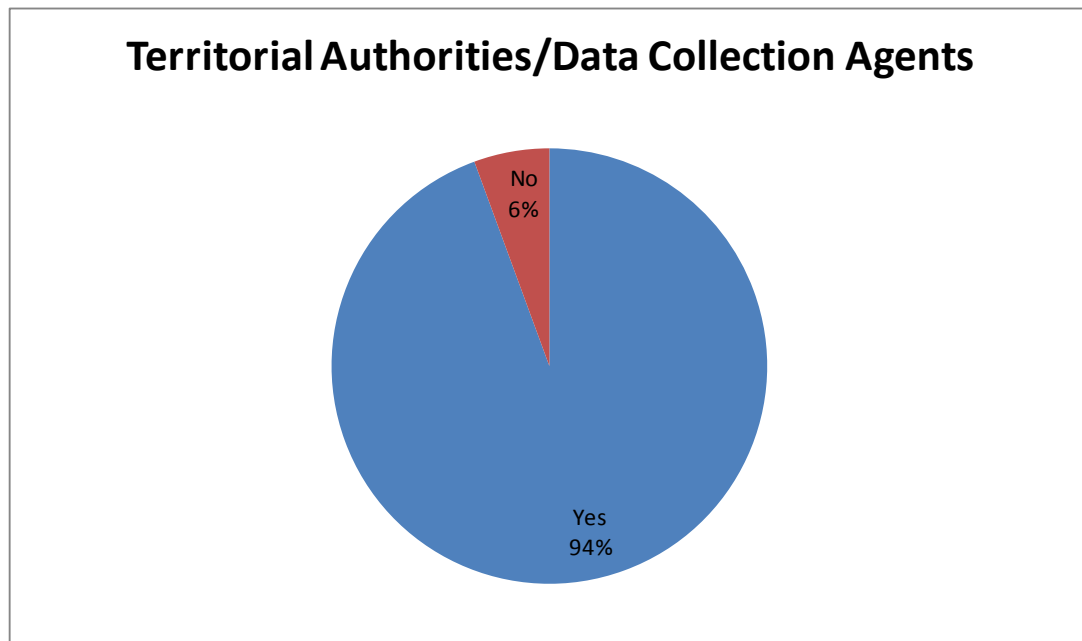
The relationship between consistent application of the protocols and the consistency of the resulting data was mentioned by most of the respondents. One respondent expressed concerns about the sharing of commercially-sensitive data with TAs, which can be trade competitors.

Full text of the substantive replies received in response to this question is in Appendix 34.

3.3.6 Roles and Responsibilities

3.3.6.1 TAs / Data Collection Agents

3.3.6.1.1 Survey



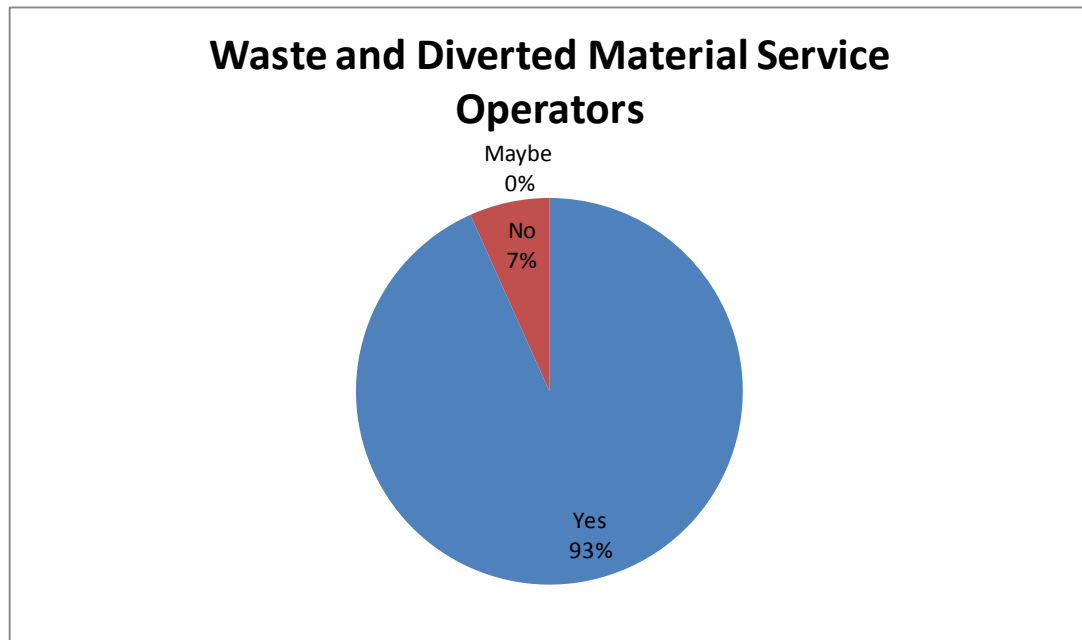
94% of respondents indicated that the roles and responsibilities of TAs were clear.

3.3.6.1.2 Comments

No substantive replies were received in response to this question.

3.3.6.2 Waste and Diverted Material Service Operators

3.3.6.2.1 Survey



93% of respondents thought the roles for waste and diverted material service operators were clear.

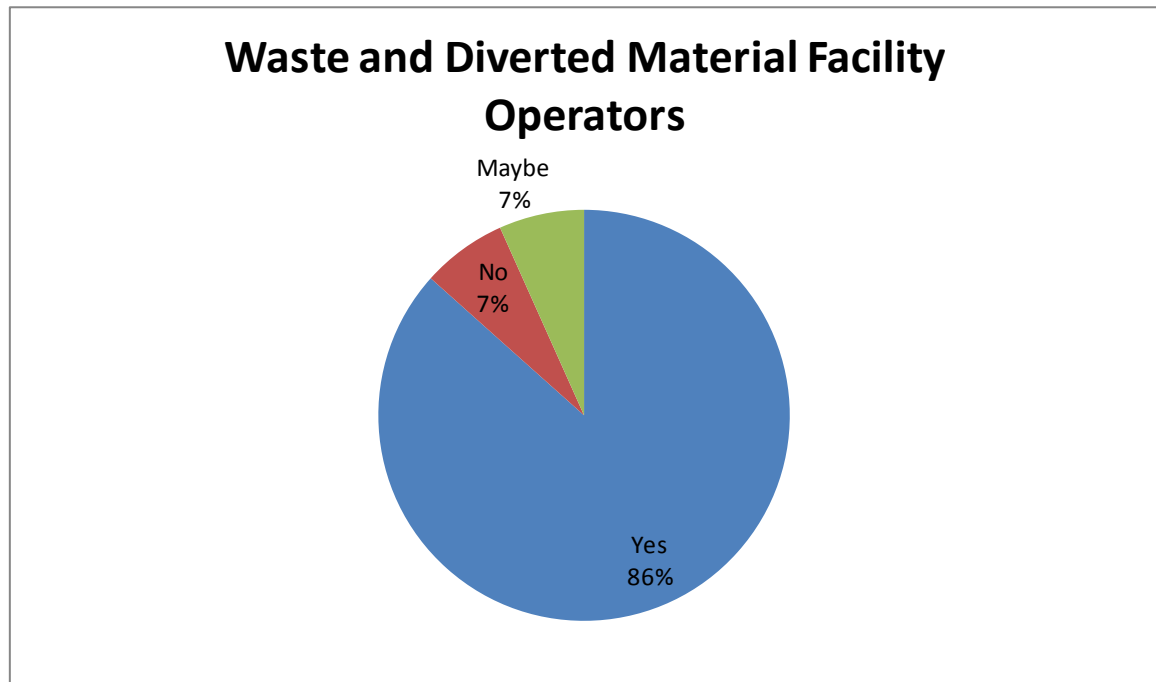
3.3.6.2.2 Comments

The two respondents to provide substantive replies expressed concern about the reasonableness of the protocols, with the confidentiality, work load, and cost of providing the data being identified.

Full text of the substantive replies received in response to this question is in Appendix 39.

3.3.6.3 Waste and Diverted Material Facility Operators

3.3.6.3.1 Survey



86% of respondents felt that the role of waste and diverted material facility operators is clear in the protocols.

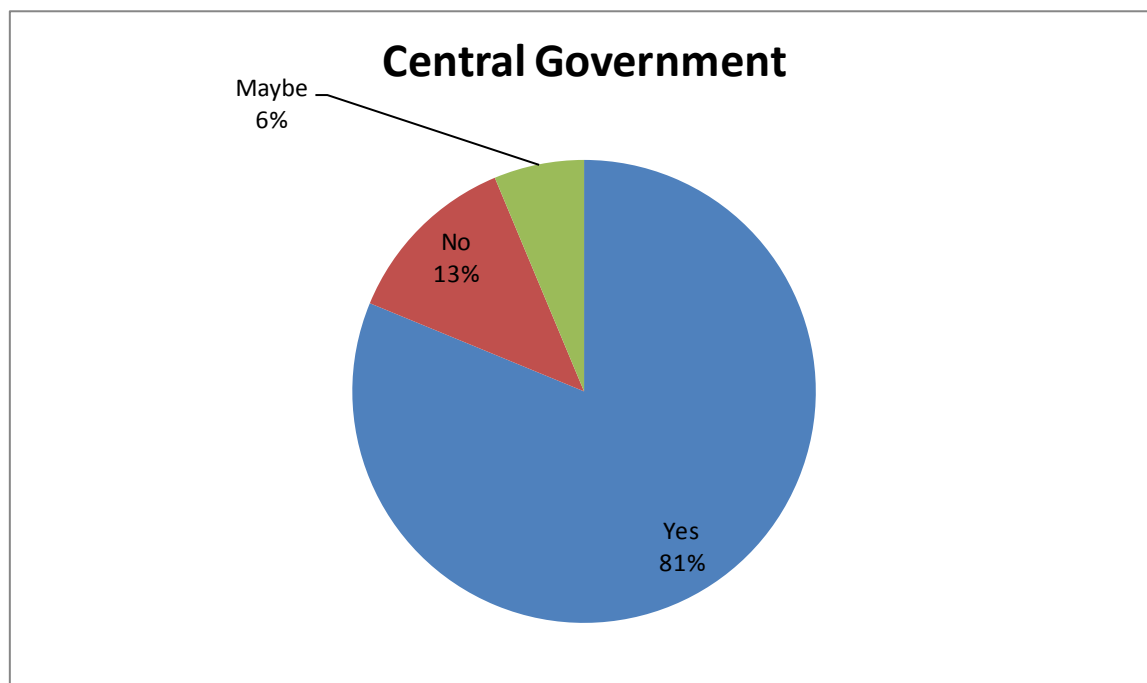
3.3.6.3.2 Comments

One respondent did not consider the responsibilities reasonable and another suggested the protocols could be incorporated into Protocol B (Disposal Facilities).

Full text of the substantive replies received in response to this question is in Appendix 40.

3.3.6.4 Central Government

3.3.6.4.1 Survey



81% of respondents felt that the role of central government in the protocols was clear, with 13% saying it was not clear.

3.3.6.4.2 Comments

All respondents to provide a substantive reply to this question considered that MfE could play a greater role in producing a national waste database. One respondent questioned whether the National Waste Data Framework would be co-ordinated with the National Monitoring System.

Full text of the substantive replies received in response to this question is in Appendix 41.

3.3.7 Possible improvements

3.3.7.1 Comments

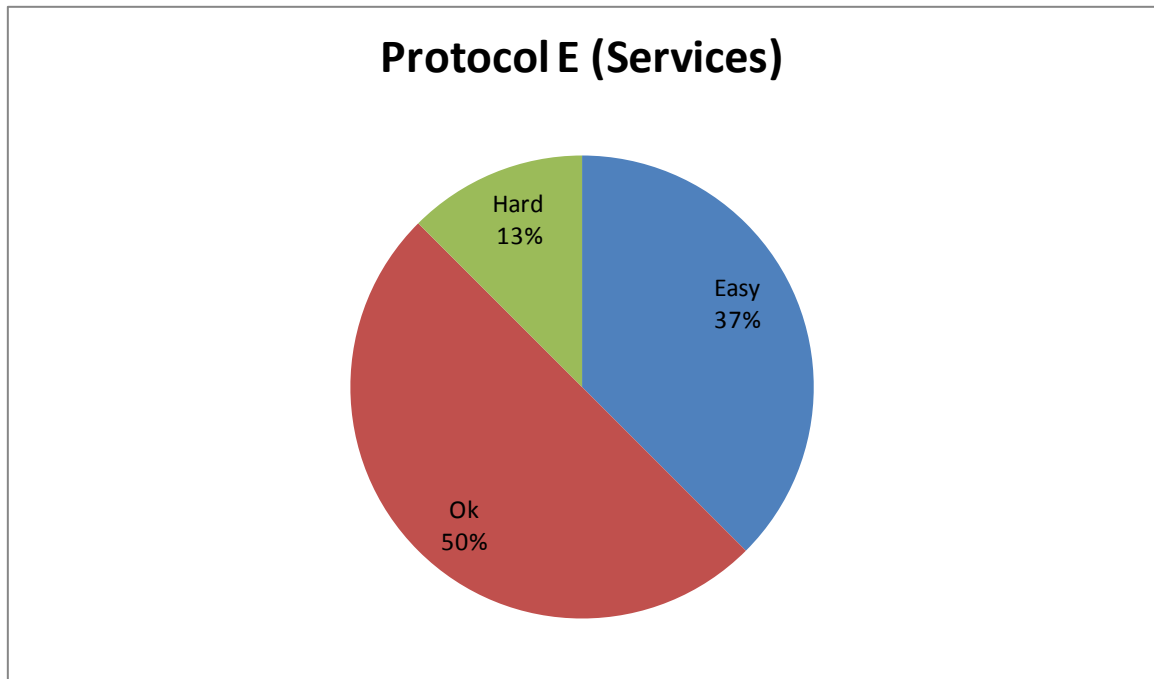
One respondent identified an error in the consultation document, which does not, however, occur in the protocols themselves. The cost to commercial operators gathering and providing data was mentioned by another. Detailed suggestions included the reporting of annual throughput of facilities as well as the maximum capacity, the meaning of the term “dropoff”, and the possible addition of several terms for organic waste outputs.

Full text of the substantive replies received in response to this question is in Appendix 37.

3.3.8 Protocol E

3.3.8.1 Easiness to follow

3.3.8.1.1 Survey



87% of respondents felt that protocol E would be either easy or OK to follow with only 13% indicating they felt it would be hard

3.3.8.1.2 Comments

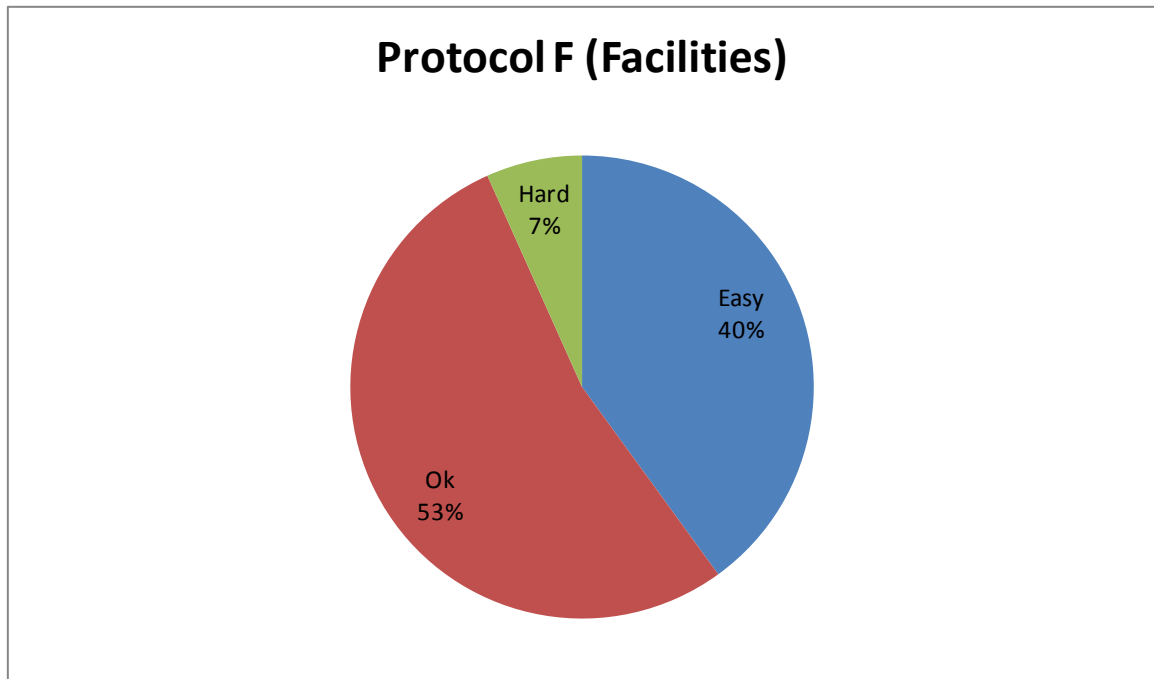
A respondent considered there to be some confusion relating to the annual quantities of services that cover several districts or that collect more than one type of waste at a time. A suggestion was made that the protocols include the reporting of kerbside receptacles. Another questioned the availability to TAs of data on specific waste streams, such as loose litter and road sweepings due to these being covered by roading contracts.

Full text of the substantive replies received in response to this question is in Appendix 35.

3.3.9 Protocol F

3.3.9.1 Easiness to follow

3.3.9.1.1 Survey



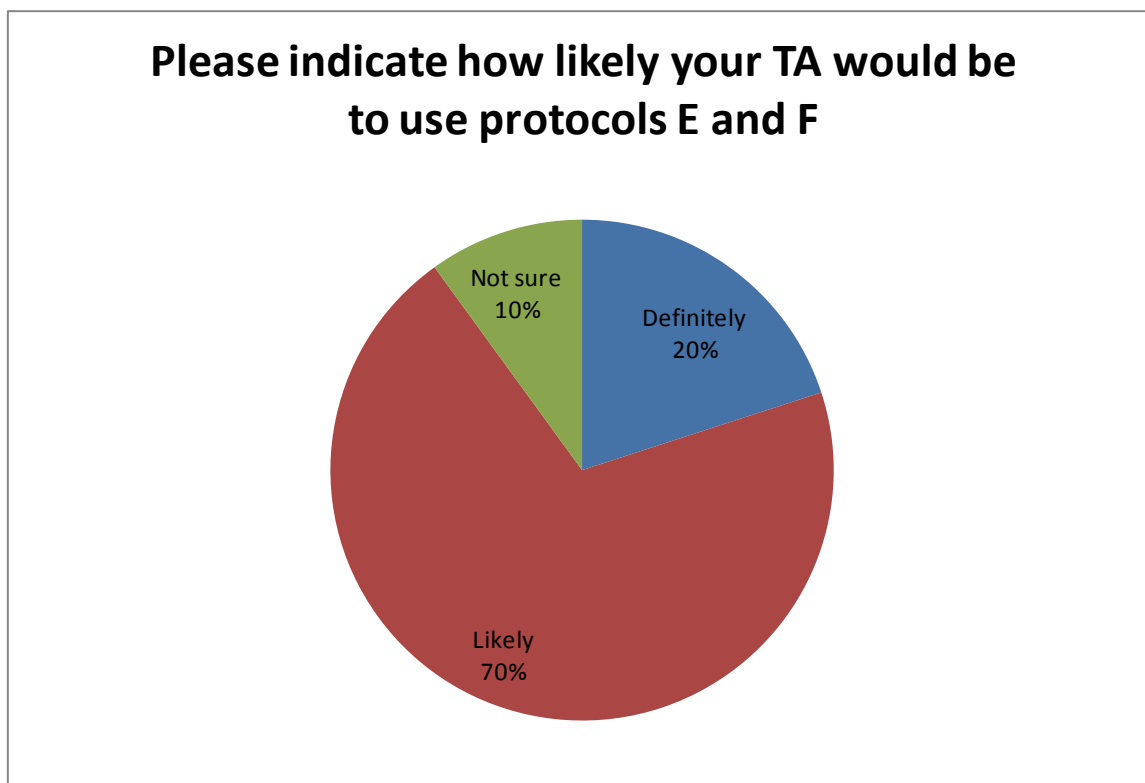
3.3.9.1.2 Comments

A concern was raised over there being an overlap on capacity of facilities and/or services that cover more than one TA area, resulting in difficulties in assessing the total capacity for a region.

Full text of the substantive replies received in response to this question is in Appendix 36

3.3.10 TA Uptake of Protocol E and F

3.3.10.1 Survey



90% of TA respondents indicated they would definitely or likely use protocols E & F, including in their waste assessments. No respondents indicated they would not use the protocols.

3.3.10.2 Comments

One respondent judged that the Framework would be a positive step towards regional and national trend comparisons. A TA indicated that the protocols would be used during the current waste assessment process to assess whether there are any gaps in the data and to test the protocols.

Full text of the substantive replies received in response to this question is in Appendix 42.

3.3.11 Improvements to make Protocols E and F more useful

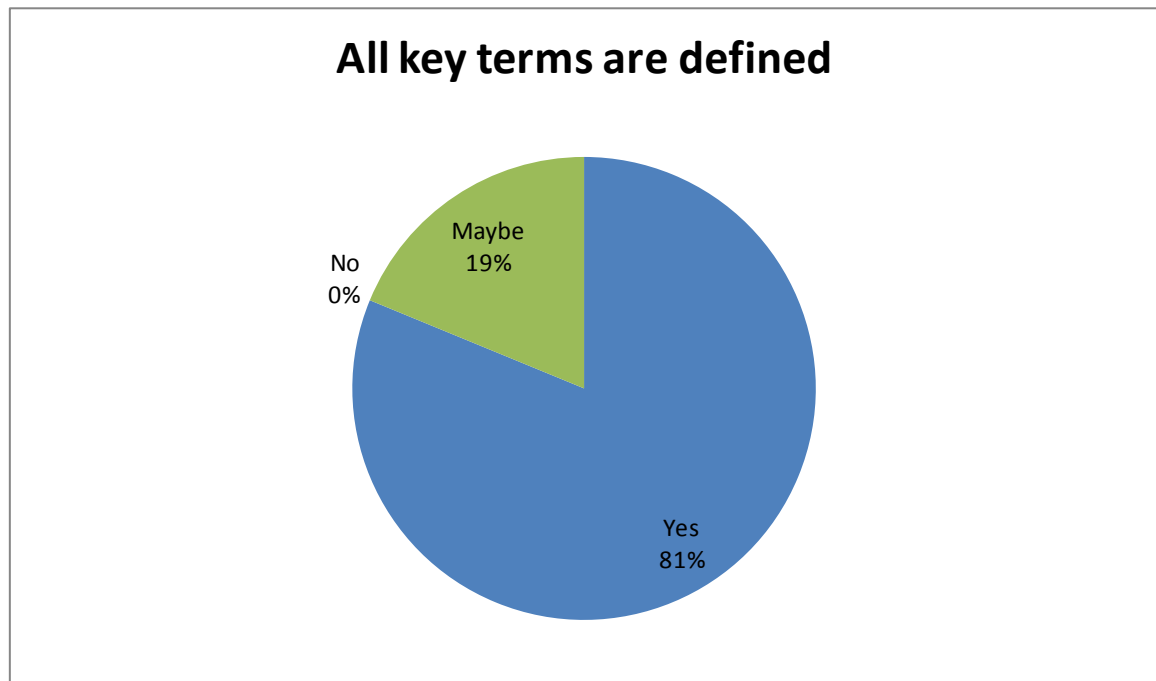
3.3.11.1 Comments

There were no substantive responses to this question.

3.3.12 Definitions in Protocols A-F

3.3.12.1 Key terms defined

3.3.12.1.1 Survey



81% of respondents thought all key terms were defined by the protocols with a further 19% unsure. No respondents indicated that all key terms were not defined.

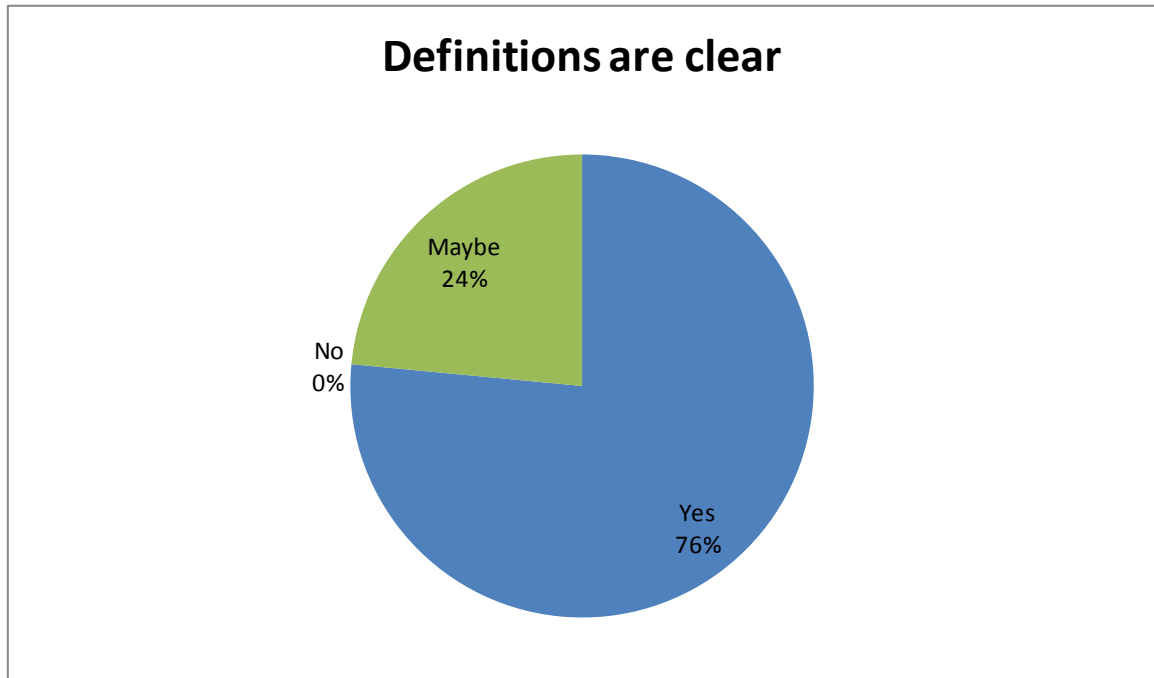
3.3.12.1.2 Comments

The single substantive response related to the measurement of diverted waste. This measurement is not a function of the protocols.

Full text of the substantive replies received in response to this question is in Appendix 43

3.3.12.2 Definitions clear

3.3.12.2.1 Survey



Three quarters of respondents felt the definitions were clear, with the remaining quarter unsure. No respondents indicated the definitions were unclear.

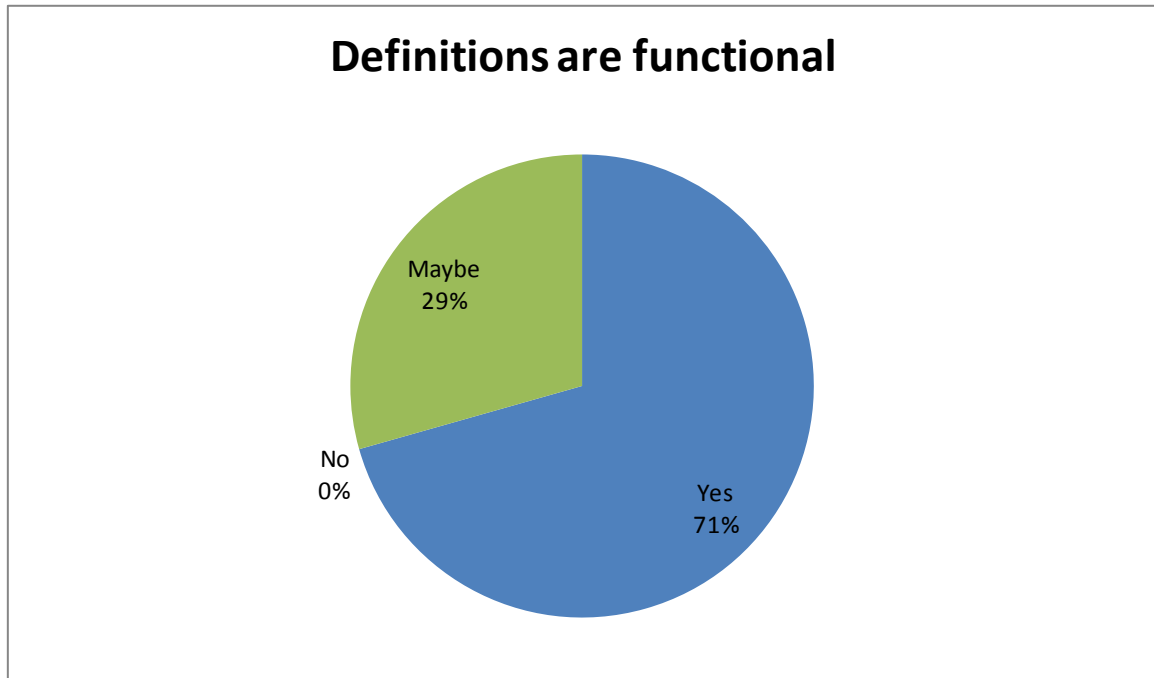
3.3.12.2.2 Comments

The distinction between “education facility” and “education service” was questioned. Clarification was sought over the classification of particular materials, such as VENM and biosolids, and the need for consistent usage of terms.

Full text of the substantive replies received in response to this question is in Appendix 44

3.3.12.3 Definitions functional

3.3.12.3.1 Survey



71% of the respondents indicated they felt the definitions are functional with the remaining 29% expressing a level of uncertainty. No one indicated they thought the definitions were not functional.

3.3.12.3.2 Comments

A conflict between the gathering of data on waste composition and source with the need for commercial confidentiality was identified.

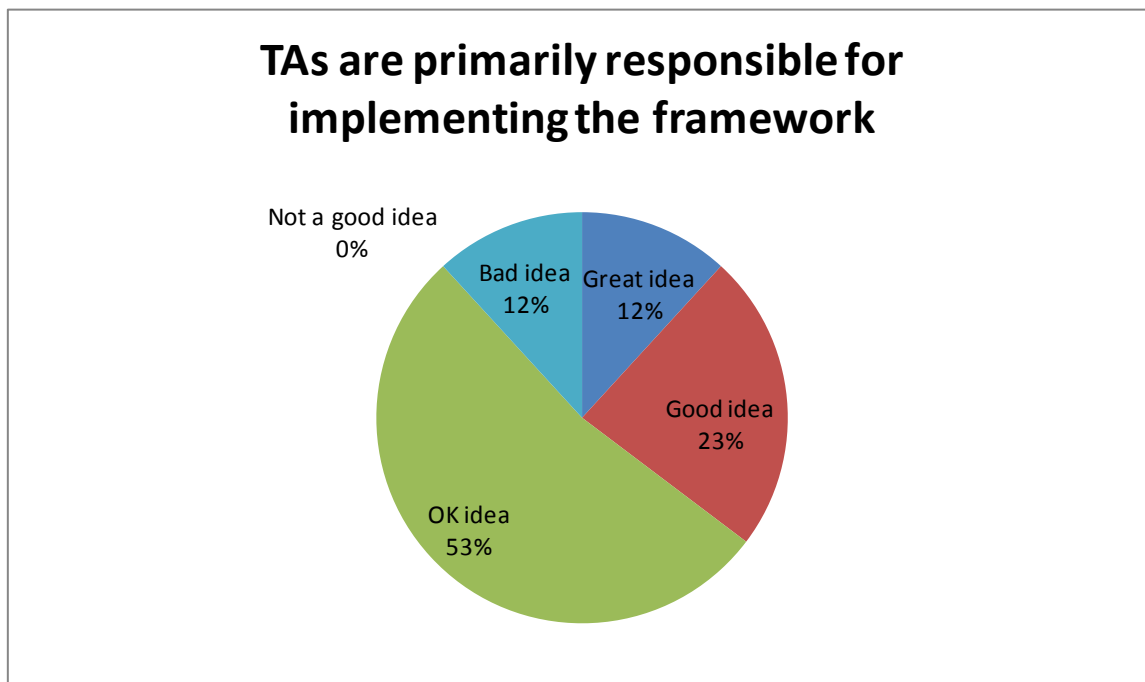
There was one comment on whether additional definitions were needed.

Full text of the substantive replies received in response to this question is in Appendix 45.

3.4 Framework Implementation

3.4.1 TAs Primarily Responsible

3.4.1.1 Survey



There was overall support for the proposition that TA be primarily responsible for implementing the Framework. The largest proportion (53%) felt it was an 'OK' idea with a further 35% indicating it was either a great idea or a good idea.

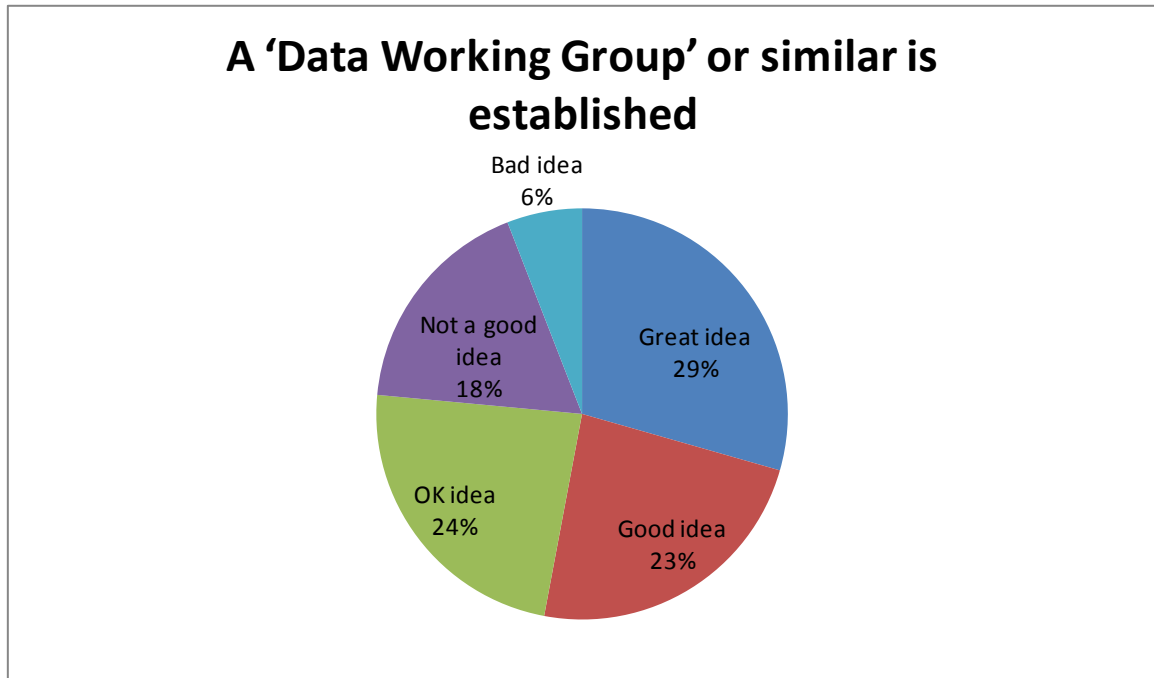
3.4.1.2 Comments

Those respondents opposed to this implementation model noted the potentially limited uptake by TAs and the inability of TAs to guarantee confidentiality of data. Those in favour of the model identified the potential speed of the implementation and noted the logic of TAs being responsible due to their requirement to produce waste assessments.

Full text of the substantive replies received in response to this question is in Appendix 46

3.4.2 Data Working Group Established

3.4.2.1 Survey



There was majority support for the proposition that a 'Data Working Group' or similar be established to oversee Framework implementation and data issues on an ongoing basis. However support was mixed with a quarter of respondents feeling it was not a good idea or a bad idea.

3.4.2.2 Comments

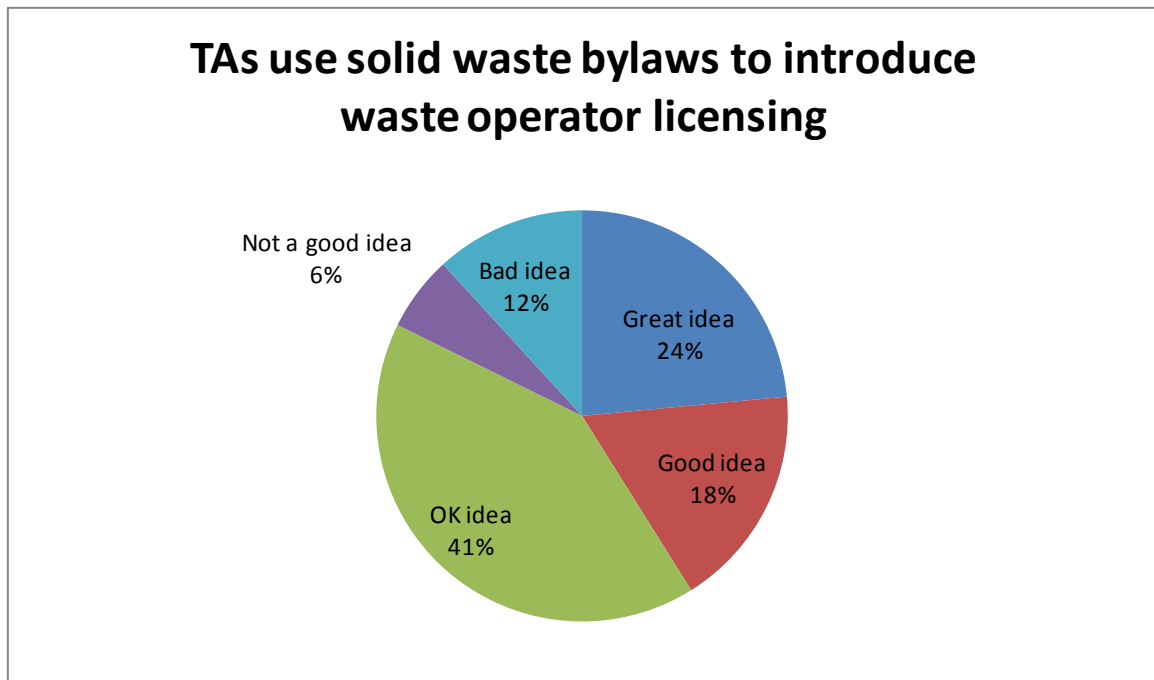
One of the respondents opposed to this implementation model noted that "consultants do not volunteer" and would require payment and have a vested interest in the project. Other respondents expressing reservations regarding the model may have been unclear as to what the model involved.

Those in favour of the model identified the need for an entity to oversee and advocate the implementation and use of the Framework.

Full text of the substantive replies received in response to this question is in Appendix 47

3.4.3 TAs Using Solid Waste Bylaws

3.4.3.1 Survey



There was broad support for the concept of TAs use solid waste bylaws to introduce waste operator licensing that requires the provision of waste data as part of the license conditions. The largest group of respondents felt it was an 'OK' idea.

3.4.3.2 Comments

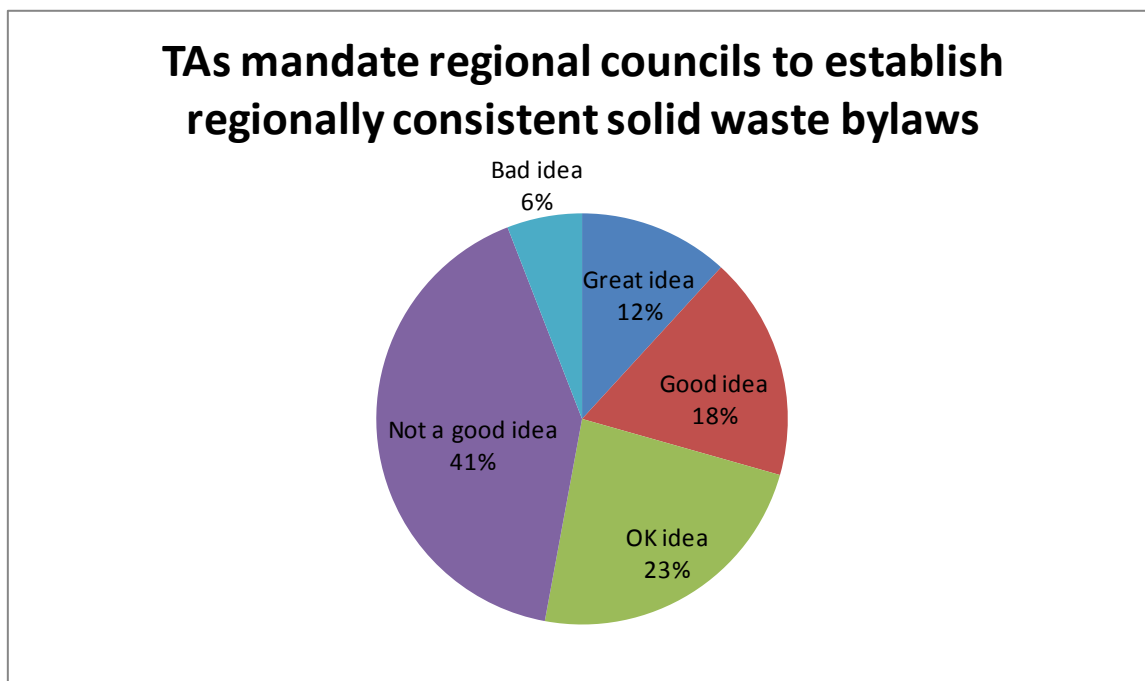
Those respondents expressing reservations regarding this model noted the administrative burden this would place on TAs, concerns regarding commercially-sensitive data, and the ability of TAs to obtain this data through contractual arrangements.

The respondents in favour of this model also noted resourcing implications for TAs, concerns relating to commercially-sensitive data, and the timeframes that implementation could entail. The development of model bylaws specifically for this purpose was mentioned.

Full text of the substantive replies received in response to this question is in Appendix 48.

3.4.4 TAs Mandating Regional Councils

3.4.4.1 Survey



This option received the lowest level of support with 47% of respondents indicating they thought it was not a good idea or a bad idea.

3.4.4.2 Comments

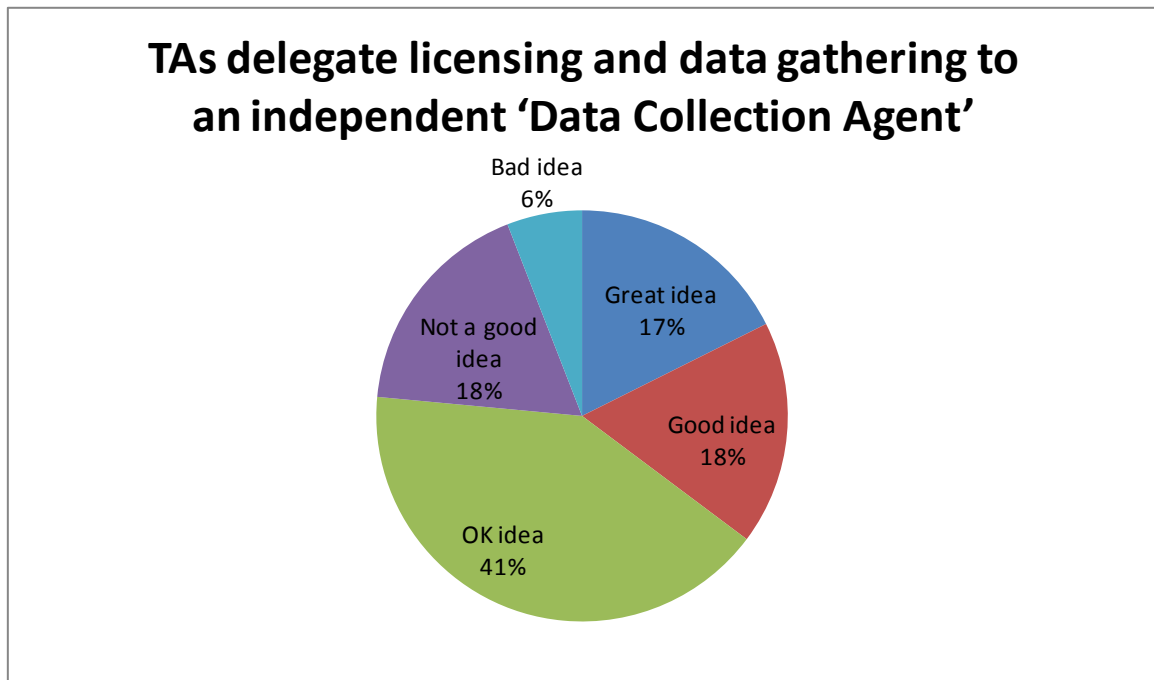
The respondents opposed to this model considered that TAs would lose control, the model would not receive national support, and the lack of regional council expertise regarding TA waste operations.

Those respondents who supported this model noted regional councils' expertise in handling environmental data, the mitigation of concerns regarding commercially-sensitive data, and potential cost reductions. One of these respondents doubted that many regional councils would take on this role.

Full text of the substantive replies received in response to this question is in Appendix 49.

3.4.5 TAs Delegate to Independent Data Collection Agent

3.4.5.1 Survey



The proposition that TAs use solid waste bylaws to introduce waste operator licensing that requires the provision of waste data as part of the license conditions, and delegate the licensing and data gathering function to an independent 'Data Collection Agent' received moderate support. 35% felt it was either a good or great idea, 41% OK idea and 24% a bad idea or not a good idea.

3.4.5.2 Comments

One respondent opposed to this model questioned whether the third party would charge non-users of the service, such as central government, for access to data. Another did not support commercial operators being required to pay for providing commercially-sensitive data.

Supporters of the model mentioned the potential benefit of there being a single Data Collection Agent nationwide and the improved data accuracy and industry engagement that would result. The uneven adoption of bylaws by TAs was noted as a drawback, with the use of existing contractual arrangements for gathering data being mentioned by one respondent.

Full text of the substantive replies received in response to this question is in Appendix 50

4 Responses to Feedback from Consultation

In the following table, the general themes and specific issues raised during the consultation have been summarised. All of the feedback from emails, the workshops, and the online survey have been taken into account. The project team's response to the themes and issues are also provided in the table. Where further action is considered warranted, the response has been highlighted.

ISSUE / THEME	RESPONSE (highlighting indicates further action required)
Data Quality	
Data used by TAs for waste assessments needs to be verifiable and auditable.	Under the current regulatory regime, TAs have limited powers to do this. Cross-checking of data is an important part of implementing the protocols, and should be possible as data is collected from multiple sources. The introduction of a bylaw with licensing powers will provide TAs with greater powers for ensuring data accuracy.
Not all transfer stations and disposal facilities have weighbridges.	Government regulations and the protocols provide methods for estimating waste tonnages from whatever data is available. A vast majority of waste is weighed before being disposed of at a disposal facility and this provides a reliable dataset upon which other estimates can be based.
The complexity of the data gathered by the protocols will reduce the accuracy of the resulting dataset.	The needs assessment undertaken for Milestone One of this project determined the basic dataset required for waste to disposal facilities. The protocols have been designed to collect this dataset while ensuring the ability of the TA to cross-check and validate the data to some degree.
The degree of uptake of the Framework will affect the completeness of the dataset.	In the absence of any regulatory requirements for TAs to adopt the Framework, it is agreed that universal uptake is not likely in the near future. Whatever the level of uptake, it is considered that the resulting national dataset will be superior to that which exists currently.
"Annual throughput" should be included in the information on services and facilities.	This is covered in the protocols for services but omitted for information collected on facilities. The omission will be rectified.
There will be a double-counting of data in the protocols on waste to disposal facilities.	Collecting the same data from separate sources is an integral part of the protocols, and will allow for the cross-checking and validation of the information that is provided. Careful handling of the data should ensure that no actual "double-counting" that affects the accuracy of the results occurs.
Kerbside refuse wheelie bins typically comprise waste from several different activity sources.	It is accepted that Domestic Kerbside includes a variety of waste types, as do Residential loads taken to transfer stations. For planning purposes, more granular data on the composition of these loads is

ISSUE / THEME	RESPONSE (highlighting indicates further action required)
	best gathered through SWAP surveys.
Data on services and facilities that operate across several districts will be difficult to handle.	It is agreed that this will be an issue, but the problems are not insurmountable. Co-operation between TAs at a regional level would mitigate the issue.
Implementation	
Stated preference for a centralised system, potentially with MfE involvement	No further response is possible at this stage, as this option was excluded at an earlier stage of the development of the Framework
There was confusion about the meaning of “implementation” of the Framework in the online survey	It is accepted that confusion was generated by the use of this word in the online survey. The more detailed description of the “implementation” options in the consultation document, however, more clearly demonstrated the intended meaning of the term.
Implementation of the Framework by TAs will require resources.	It is accepted that implementation of the Framework may involve initial expenditure on software changes, staff training as well as ongoing costs for the handling of data. Some of these costs may be able to be recovered through waste operator licensing fees.
Weighbridge software and weighbridge operators may have difficulties in adapting to new data-gathering requirements.	It is acknowledged that a considerable proportion of the data-gathering required for the protocols will be the responsibility of weighbridges at transfer stations and disposal facilities. The ability of different weighbridge software packages to accept new codes varies, and will need to be dealt with on a case-by-case basis. Most weighbridges should be able to identify waste collectors by default, which means manual data entry will only be required for general users. Many busy weighbridges already use a large number of codes, and the addition of five more should not be an insurmountable burden for operators. The activity source of most waste loads will be able to be identified visually by the operators. If a small proportion of loads are not identified, this will only marginally affect the accuracy of the data that is gathered.
Implementation Option Two (Data Working Group) will not work because “consultants do not volunteer”, will require payment, and have a vested interest in the project.	Option Two suggests that the Data Working Group “could potentially be established under the auspices of WasteMINZ, and operate in a similar manner to sector groups, with the group supported by volunteers”. Consultants may not necessarily be involved in this process. All of the existing WasteMINZ sector groups already have consultants, providing services voluntarily, as members.
Disposal facilities would need to report under two different systems (OWLS and the Framework).	This is correct, but disposal facilities already report environmental data to a number of agencies. Most of the data currently reported under OWLS matches that required by the Framework.
There will be difficulties in collecting geographic source data from waste collectors and on	It is agreed that this will not be straightforward in all instances, but will vary from district to district. If actual geographic data is not collected by waste collectors, estimates are acceptable. The protocols aim to improve the quality of data that is collected by TAs, but it is

ISSUE / THEME	RESPONSE (highlighting indicates further action required)
general users.	accepted that a high degree of accuracy is not possible in some situations.
It will be difficult for waste collectors to produce activity source data.	The major national waste collectors have previously been consulted on this issue, and most of the data can be generated based on the type of collection vehicle used. The collectors may need to make some estimates, such as for kerbside collections that collect from both residential and commercial customers and gantry trucks, but a well-informed estimate will be sufficiently accurate for most purposes.
It will be difficult to gain the co-operation of service and facility operators in providing information.	It is agreed that, in the absence of any regulatory requirement, some operators may choose not to co-operate with TAs. This can be mitigated by a waste bylaw for waste operators, but not necessarily for diverted material service and facility operators.
Commercial Concerns	
Commercial waste operators should not be required to pay licensing fees and then expend resources on gathering and providing data to TAs	The WMA includes provisions that permit TAs to introduce bylaws to this effect.
Implementation of protocols possibly leading to breach of Commerce Commission standards by TAs	Seek further information from respondent and act accordingly.
TAs should not collect data from commercial waste operators, particularly when it is a trade competitor.	The WMA requirement for TAs to produce a waste assessment outweighs concerns about commercially-sensitive data as long as the TA develops and implements appropriate protocols for the collection, storage, handling, and release of data.
More specific guidance on data integrity and commercial confidentiality should be provided, possibly at a national level.	Detailed guidance for TAs on the collection, handling, and dissemination of data that could be commercially-sensitive is considered outside the scope of the project. There are too many differences between TAs for anything other than general principles to be put forward. The waste unit of a large TA will require different protocols than for a small TA with, perhaps, a single officer working in the waste area. Should a waste data WasteMINZ sector group be established, this could be an issue to be investigated further.
Waste and diverted material facility operators have concerns about commercially-sensitive data and the resources require to provide data to TAs.	General principles for TA handling of commercially-sensitive data have been included in the protocols. It is not considered that the resources required by waste and diverted material facility operators to provide data to TAs will be onerous. The protocols do not include information that the operators should not already have readily available.

ISSUE / THEME	RESPONSE (highlighting indicates further action required)
Definitions & Classifications	
Default SWAP compositions for the different activity sources should be made available.	As the composition of the different activity sources can vary between districts based on a number of factors, it is more appropriate for each TA to either use composition data from a similar TA that is available online or collect their own data.
Request for a specific tonnage limit for identifying “Waste Collectors”	A specific definition would not be considered appropriate as each TA should be able to choose its own parameters for identification. A specific limit may not be appropriate for all TAs.
Request for a specific percentage of out-of-district waste rather than the protocol’s “significant proportion” and “more than negligible” with regards to the geographic source.	The argument becomes circular, as few TAs have detailed information on how much general user waste enters transfer stations or disposal facilities. At this early stage of the Framework’s development, it is considered the resolution of this matter is best left to the judgement of the individual TA. An initial data-gathering programme should inform the TA as to whether out-of-district-waste is of a magnitude to warrant ongoing data collection.
Litter, illegal dumping, and product stewardship waste should be included as separate activity sources.	Very few TAs collect data on these types of waste, and their inclusion would result in the activity sources not matching those in common usage. Every TA is free to collect more detailed data should it wish, as long as it can be aggregate upward to match the activity sources in the protocol.
The protocols on services should include the reporting of the type of kerbside receptacles.	The protocols will be altered accordingly.
The protocols do not quantify the diversion of waste by collectors or transfer stations.	The protocols are specifically intended to quantify the disposal of waste to disposal facilities. TAs are free to collect additional data and include it in their waste assessment, should they wish.
There is confusion over the usage of some terms, such as “cleanfill”, “VENM”, and “Rubble”.	The protocols will be reviewed to ensure the usage is correct. Some of the confusion arises because different terms are used in existing definitions and protocols, which have been co-opted into the Framework.
The distinction between transfer stations and disposal facilities is arbitrary and does not correlate with how many facilities function.	It is accepted that there are several models for the operation of combined transfer station / disposal facilities. The protocols are not intended to be prescriptive in this respect, with every facility operator free to work out the best solution for their facility, as long as the resulting dataset is accurate and in accordance with the protocols. This point will be emphasised in the revised protocols.
Other	
Apparent misunderstandings of Protocols A-D at both specific and general levels	Introduce an introductory chapter that presents the operation of the waste to disposal facilities protocols in a simpler fashion

ISSUE / THEME	RESPONSE (highlighting indicates further action required)
Diverted materials used for landfill cover are not included by the Framework.	This is incorrect. Section B.6 discusses diverted materials from disposal facilities. An error identified in the reporting form in B.7 will be corrected.
Is it realistic for transfer station operators to be asked to conduct activity source and geographic source surveys?	This is not the preferred method for gathering data, but in those instances where the preferred method is not practical, a well-managed weighbridge survey can produce reasonably reliable results.

5 Summary and Conclusions

5.1 Summary

The consultation is a vital phase in the development of the Framework. While the earlier phases of the project gave a clear indication of the need to improve waste data and showed that there is support for the concept, this phase represented a touchstone for the degree to which the Framework will actually deliver on its objectives and provide a practical basis on which to build waste data gathering and sharing capacity in New Zealand.

The level of response to the consultation was relatively low – especially when compared to the stage one consultation on data needs, which canvassed the same audience but generated in the order of 10 times the level of response. This level of response was not unexpected, however, due to the technical nature of the Framework protocols and the need to read and absorb the information before commenting. In fact, given that the level of promotion of both consultations was similar and the primary method of feedback was through a similar online survey, the low level of response could be interpreted to mean that few stakeholders felt the need to comment. Those with few concerns or those not significantly affected would be less likely to invest the time required.

Those who did take the time to provide feedback were generally those who were going to be directly impacted by the Framework and/or had concerns. Given the relatively small numbers of respondents, it is not possible to say that the responses are representative of the views of the waste sector as a whole. However, it is likely that the issues raised and the comments provided cover the range of views in the industry, and there were some useful key themes to emerge.

The majority of the substantive feedback focused on particular elements of the Framework, and there was little comment on the overall structure of the Framework or how well this might succeed (or not) in capturing the necessary data. In general, the picture that emerges from the responses is that the protocols are capable of doing the job for which they are designed– albeit with some minor suggestions for improvement

Key messages to emerge from respondents' feedback included the following:

- Respondents felt that the right data will be gathered by the protocols. It will generally be sufficiently accurate and complete with no significant gaps or overlaps (with overlaps being identified by some respondents as useful for cross-checking the data)
- The roles and responsibilities are clear, although not everyone agrees with the proposed roles, most notably that central government does not have a specific role

- There were a number of suggestions for minor improvements but no suggestions for major improvement
- There were mixed views about how easy the protocols were to follow, but the majority indicated they were 'easy' or 'OK' to understand. A number of the comments provided suggest that communication of the protocols is likely to be vital in facilitating their widespread uptake.
- There were some concerns raised by a few respondents regarding commercial confidentiality and the burden placed on commercial operators
- The protocols are generally seen to be functional. None of the feedback suggested a more functional alternative
- All TAs indicated they will definitely use or be likely to use all the protocols
- The definitions are considered to be clear, and cover the terms required, although some minor modifications may need to be made to a few definitions.
- There was no strong preference for how the Framework should be implemented. The strongest support was for TAs having responsibility while the lowest level of support was for TAs delegating responsibility to regional councils.

5.2 Next Steps

Key elements of the project to take this work forward in Milestone Four include:

- Evaluate the comments in detail and determine precisely what changes are required to the protocols to address the issues raised
- Update the protocols in response to the consultation and finalise the Framework
- Engage an Information Management expert to advise on data handling and security protocols, and potential system options
- Develop implementation plan with tasks, timeframes and dependencies for roll-out of the Framework. The plan will cover roles, ownership, funding, IT requirement, timelines and milestones, monitoring and review, and will include recommendations for further phases of the Framework.

Appendix 1 – Online Survey Form

National Waste Data Framework – Stakeholder Consultation

Introduction

The lack of good quality, consistent waste data prevents both the public and private sectors in New Zealand from effectively planning, monitoring, and reporting on waste issues and developing and prioritising appropriate solutions.

In response to these issues WasteMINZ, in consultation with industry, and with support from central, regional, and local government developed the National Waste Data Framework project.

The National Waste Data Framework project has received support from the Waste Minimisation Fund and is due to be completed in August 2015.

Your feedback:

Please use this online form to provide your feedback on the draft protocols that have been developed as part of **Milestone Two** of the project.

Before providing your feedback online, we recommend you do the following:

1. Read our stakeholder consultation document which explains the background to the project, what the project includes, and why we have chosen this approach. A range of frequently asked questions and answers are also provided. [You can read the stakeholder consultation document here.](#)
2. Review the draft protocols (there are two protocols on which feedback is being sought - Waste to Disposal Facilities and Information on Waste and Diverted Material Facilities). [You can read these here.](#)
3. Attend one of our consultation workshops, where we will explain our approach and you can provide feedback. You can attend either in person or via webinar. For workshop dates [please click here.](#)

Please proceed to provide your feedback.

Page 1

National Waste Data Framework - Stakeholder Consultation

Your details

1. Please provide your contact details below, so we can get in touch if there is anything we need to clarify about your feedback.

Name

Organisation

Email address

Page 2

National Waste Data Framework – Stakeholder Consultation

2. Please indicate if your organisation fulfills any of the following roles? Select all that apply.

- ☐ Transfer Station operator
- ☐ Disposal Facility operator
- ☐ Waste collector
- ☐ Territorial Authority
- ☐ Regional Council
- ☐ Central Government
- ☐ Research/consulting
- ☐ IT service provider
- ☐ Commercial enterprise (waste generator)
- ☐ Waste equipment/service supplier
- ☐ Community organisation
- ☐ Product stewardship organisation

Other (please specify)

National Waste Data Framework - Stakeholder Consultation

Definitions and Protocols for Waste to Disposal Facilities

The four protocols together are intended to enable consistent data to be gathered and compiled on the following:

- The quantity of material sent to disposal facilities via different collection routes (e.g. transfer station, kerbside collections etc)
- The activity source of the waste (e.g. household, commercial, construction & demolition etc.)
- The geographical source and destination of waste
- The composition of waste by activity source (e.g. paper, plastic, organics, etc)
- The time period covered by the data

[You can view the protocols here.](#)

3. Do the protocols gather the right information for waste to disposal facilities?

- ☐ Yes
- ☐ No
- ☐ Mostly
- ☐ Don't know

Comments

4. Is there any other information on waste to disposal facilities that should be gathered? If so please state what this information is and why it is important.

- ☐ Yes
- ☐ No
- ☐ Don't know

Comments

National Waste Data Framework - Stakeholder Consultation

Will the protocols for Waste to Disposal Facilities ensure the following?

5. The data will be accurate

- ☐ Yes
- ☐ No
- ☐ Maybe. Please comment.

Comments

6. There will be no significant gaps in the data

- ☐ Yes
- ☐ No
- ☐ Maybe. Please comment.

Comments

7. There will be no significant overlaps in the data

- ☐ Yes
- ☐ No
- ☐ Maybe. Please comment.

Comments

8. The data will be consistent and able to be shared

- ☐ Yes
- ☐ No
- ☐ Maybe. Please comment.

Comments

National Waste Data Framework - Stakeholder Consultation

Please indicate how easy you think each of the protocols is to follow:

9. Protocol A (Transfer Stations)

☐ Easy

☐ Ok

☐ Hard

Comments

10. Protocol B (Disposal Facilities)

☐ Easy

☐ Ok

☐ Hard

Comments

11. Protocol C (Waste Collectors)

☐ Easy

☐ Ok

☐ Hard

Comments

12. Protocol D (Territorial Authorities)

☐ Easy

☐ Ok

☐ Hard

Comments

National Waste Data Framework - Stakeholder Consultation

6. Do you have any suggestions for additional information or improvements i...

13. Protocol A (Transfer Stations)

14. Protocol B (Disposal Facilities)

15. Protocol C (Waste Collectors)

16. Protocol D (Territorial Authorities)

National Waste Data Framework - Stakeholder Consultation

7. Are the Roles and Responsibilities of the key parties clear and reasonab...

17. Transfer Stations

- ☐ Yes
- ☐ No
- ☐ Don't know

Comments

18. Disposal Facilities

- ☐ Yes
- ☐ No
- ☐ Don't know

Comments

19. Waste Collectors

- ☐ Yes
- ☐ No
- ☐ Don't know

Comments

20. Territorial Authorities

- ☐ Yes
- ☐ No
- ☐ Don't know

Comments

National Waste Data Framework - Stakeholder Consultation

21. Central Government

- ☐ Yes
- ☐ No
- ☐ Don't know

Comments

National Waste Data Framework - Stakeholder Consultation

For TAs ONLY

If you are not a TA, please **DO NOT** answer these questions.

22. Please indicate how likely your TA would be to use protocol D (including when preparing your next waste assessment or implementing a solid waste bylaw):

- ☐ Definitely
- ☐ Likely
- ☐ Not sure
- ☐ Probably not
- ☐ Definitely not
- ☐ Not applicable

Please provide a reason for your answer

National Waste Data Framework – Stakeholder Consultation

12. For Waste Collectors, Disposal Facility Operators and Transfer Stations...

Are there any elements of the protocols that your organisation would have difficulty putting into practice? If so, what are they? Why are they an issue? And is there a solution?

If you are not a Waste Collector, Disposal Facility Operator or Transfer Station Operator, please **DO NOT** answer these questions.

23. Transfer Stations

☐ Yes

☐ No

Comments

24. Disposal Facilities

☐ Yes

☐ No

Comments

25. Waste Collectors

☐ Yes

☐ No

Comments

National Waste Data Framework – Stakeholder Consultation

26. Do you have any other comments or suggestions on the Definitions and Protocols for Waste to Disposal Facilities?

National Waste Data Framework - Stakeholder Consultation

Definitions and Protocols for Information about Waste and Diverted Material...

These two protocols together are intended to enable consistent information to be gathered and compiled for the purposes of waste management and minimisation planning. [You can view the protocols here.](#)

The protocols focus on the following information:

- Type of Service or Facility
- Quantity/Capacity
- Composition
- Location/Coverage
- Restrictions
- Ownership
- Outputs

27. Do the protocols gather the right information for Waste and Diverted Material Services and Facilities?

- ☐ Yes
- ☐ No
- ☐ Mostly
- ☐ Don't know

Comments

28. Is there any other information on Waste and Diverted Material Services and Facilities that should be gathered? If so please state what this information is and why it is important.

- ☐ Yes
- ☐ No
- ☐ Don't know

Comments

National Waste Data Framework - Stakeholder Consultation

Will the protocols for Services and Facilities ensure the following?

29. The information will be accurate

- ☐ Yes
- ☐ No
- ☐ Maybe. Please comment.

Comments

30. There will be no significant gaps in the information

- ☐ Yes
- ☐ No
- ☐ Maybe. Please comment.

Comments

31. There will be no significant overlaps in the information

- ☐ Yes
- ☐ No
- ☐ Maybe. Please comment.

Comments

32. The information will be consistent and able to be shared

- ☐ Yes
- ☐ No
- ☐ Maybe. Please comment.

Comments

National Waste Data Framework – Stakeholder Consultation

17. Please indicate how easy you think each of the protocols is to follow:

33. Protocol E (Services)

- ☐ Easy
- ☐ Ok
- ☐ Hard

Comments

34. Protocol F (Facilities)

- ☐ Easy
- ☐ Ok
- ☐ Hard

Comments

35. Do you have any suggestions for additional information or improvements in the protocols?

National Waste Data Framework – Stakeholder Consultation

Are the Roles and Responsibilities of the key parties clear and reasonable?

36. Territorial Authorities/Data Collection Agents

☐ Yes

☐ No

Comments

37. Waste and Diverted Material Service Operators

☐ Yes

☐ No

☐ Maybe

Comments

38. Waste and Diverted Material Facility Operators

☐ Yes

☐ No

☐ Maybe

Comments

39. Central Government

☐ Yes

☐ No

☐ Maybe

Comments

National Waste Data Framework - Stakeholder Consultation

For TAs ONLY

If you are not a TA, please **DO NOT** answer these questions.

40. Please indicate how likely your TA would be to use protocols E and F (including when preparing your next waste assessment):

- ☐ Definitely
- ☐ Likely
- ☐ Not sure
- ☐ Probably not
- ☐ Definitely not
- ☐ Not applicable

Please provide a reason for your answer

41. Is there anything which would make you more likely to use the protocols, or make them more useful for your TA?

National Waste Data Framework – Stakeholder Consultation

Do the definitions of terms used in the framework meet the following criter...

42. All key terms are defined

- ☐ Yes
☐ No
☐ Maybe

Comments

43. Definitions are clear

- ☐ Yes
☐ No
☐ Maybe

Comments

44. Definitions are functional

- ☐ Yes
☐ No
☐ Maybe

Comments

45. Please indicate if you think there are other terms that need to be defined. Please include any suggested definitions:

National Waste Data Framework – Stakeholder Consultation

Framework Implementation

Please rate the Framework Implementation options in terms of how much you would like to see each one taken forward.

Refer to Appendix 1 of the Stakeholder Consultation Document for detail on these options. You can view Appendix 1 [here](#) (insert link).

46. TAs are primarily responsible for implementing the framework

- ☐ Great Idea
- ☐ Good Idea
- ☐ OK Idea
- ☐ Not a good Idea
- ☐ Bad Idea

Comments

47. A 'Data Working Group' or similar is established to oversee framework implementation and data issues on an ongoing basis

- ☐ Great Idea
- ☐ Good Idea
- ☐ OK Idea
- ☐ Not a good Idea
- ☐ Bad Idea

Comments

National Waste Data Framework – Stakeholder Consultation

48. TAs use solid waste bylaws to introduce waste operator licensing that require the provision of waste data as part of the license conditions

- ☐ Great Idea
- ☐ Good Idea
- ☐ OK Idea
- ☐ Not a good Idea
- ☐ Bad Idea

Comments

49. TAs mandate regional councils to establish regionally consistent solid waste bylaws that include waste operator licensing requiring the provision of waste data as part of the license conditions

- ☐ Great Idea
- ☐ Good Idea
- ☐ OK Idea
- ☐ Not a good Idea
- ☐ Bad Idea

Comments

50. TAs use solid waste bylaws to introduce waste operator licensing that requires the provision of waste data as part of the license conditions, and delegate the licensing and data gathering function to an independent 'Data Collection Agent'

- ☐ Great Idea
- ☐ Good Idea
- ☐ OK Idea
- ☐ Not a good Idea
- ☐ Bad Idea

Comments

National Waste Data Framework – Stakeholder Consultation

Thank you

Thanks for providing your feedback as part of this consultation. We will keep you updated as the project progresses.

In the interim, if you have any questions please contact Paul Evans on paul@wasteminz.org.nz

Appendix 2 – Workshop Attendees & Notes

ATTENDEES

WELLINGTON 13 APRIL 2015		
Natasha	Simmons	Palmerston North City Council
Lisa	Williams	New Zealand Defence Force
Chris	Purchas	Jacobs
Emily	Taylor-Hall	Wellington City Council
James	Ayling	Ministry for the Environment
Fiona	Hill	Ministry for the Environment
Jessica	Henderson	Ministry for the Environment
Paul	Evans	WasteMINZ
Duncan	Wilson	Eunomia Research & Consulting
Bruce	Middleton	Waste Not Consulting
AUCKLAND 14 APRIL 2015		
Ian	Kennedy	Waste Management NZ Ltd
Penny	Garland	O-I New Zealand Ltd
Michael	Backhurst	Auckland Council
Laurence	Dolan	EnviroWaste Services Ltd.
Paul	Bishop	EnviroWaste Services Ltd.
Paul	Evans	WasteMINZ
Nic	Quilty	WasteMINZ
Duncan	Wilson	Eunomia Research & Consulting
Bruce	Middleton	Waste Not Consulting
ONLINE WEBINAR 14 APRIL 2015		
Donna	Peterson	Invercargill City Council
Angie	Taylor	Mackenzie District Council
David	Wishart	Weightrax
Stanley	Howell	Environmental Resources Management
Nic	Quilty	WasteMINZ
Paul	Evans	WasteMINZ
Duncan	Wilson	Eunomia Research & Consulting
Bruce	Middleton	Waste Not Consulting

CHRISTCHURCH 15 APRIL 2015		
Ruth	Clarke	Timaru District Council
Chris	Keeling	Environment Canterbury
Sheryl	Stevens	Waste Advisory Board
Judi	Sefton	Eco Central
Ruth	Clarke	Timaru District Council
Tammara	McKernan	Christchurch City Council
Paul	Evans	WasteMINZ
Duncan	Wilson	Eunomia Research & Consulting
Bruce	Middleton	Waste Not Consulting

NOTES FROM WORKSHOPS

WELLINGTON 13 APRIL 2015

- *Question:* Would using a classification for “municipal solid waste” make New Zealand data more comparable with overseas data? *Response:* “Municipal solid waste” not consistently defined overseas and there’s little current usage of the term in New Zealand.
- *Question:* Why are ‘activity sources’ a mix of activity and composition? Does this not result in a reduction in the usefulness of the data? *Response:* The activity sources that have been included in the draft protocols are consistent with those currently provided for in the Online Waste Levy System and match those used in much of the historical data gathered over the last ten years.
- *Comment:* Good to have a clear idea of what the ultimate policy objectives we are dealing with are, and see the pathway from the current protocols to the ultimate outcomes. i.e. are we getting the data we need to make the policy decisions?
- *Question:* How would a transfer station identify out of district waste from a general user? *Response:* There are three possible methods for doing this described in the protocols.
- *Question:* What is the dividing line between landscaping and residential? *Response:* For a majority of loads, distinguishing between activity sources is straightforward. If a mixed load of waste appears to be from a residential source and no single activity source predominates, classify it as “residential”.
- *Question:* Has the project team sat down and discussed capability with weighbridge software providers? Could the protocols provide some guidance for weighbridge codes? *Response:* No formal discussions have taken place with the software providers. However, most weighbridge software has the capability of adding codes, with some weighbridges having over 200 codes.
- *Question:* Have the 5 implementation pathways been costed at any level? *Response:* The implementation pathways have not been costed as such. Some guidance on the set up costs and running costs of a national system may be sought later.

AUCKLAND AND ONLINE WEBINAR 14 APRIL 2015

- *Question:* Is there any possibility of TAs not being the centre of the protocols? *Response:* Other possible systems were assessed in earlier stages of the project. In the absence of any other legislative drivers, it was determined that the Framework needed to be centred, at least initially, on the TA waste assessment process.
- *Question:* How will diverted materials and cleanfill tonnes be included in the Framework? *Response:* At the start of the project, the decision was reached to start with the simple stuff, namely waste to disposal facilities and information on services and facilities, where the WMA currently provides the power to achieve some progress.
- *Question:* Are we interested in the 90% or do we want to spend time on the rats and mice? *Response:* While developing the protocols it has been recognised that 100% accuracy is not feasible. Near enough is good enough, for now, and would be a marked improvement on existing data.
- *Comment:* Transfer stations will not be able to do a mass balance as too hard to tell what is diverted. However most transfer stations do a mass balance themselves. *Response:* Most transfer stations actively divert less than 5% of materials from the tipping floor. This type of diversion (as opposed to separated materials delivered to the transfer station) has not been accounted for in the protocols because of the marginal effect it has on tonnages at this time.
- *Question:* Why not have a 3rd party set up to get data and fund it from levy money? *Response:* Such a system is possible, maybe even desirable, and has been discussed as a future implementation pathway.
- *Comment:* Commercial waste industry have some concerns about commercial confidentiality of data provided under the Framework. Why would they want to give up detailed data? Currently Framework will not give useful additional information to industry.
- *Comment:* The protocols contain no mechanism or entity for aggregating and publishing any data gathered by TAs.
- *Comment:* Attendee would like to see the fastest way possible used to pull information through bylaws together.
- *Comment:* Attendee wants to know if MfE could fund training of TAs in use of protocols.
- *Comment:* Are TAs on board or not? *Response:* Several TAs are already looking at how they will incorporate the protocols into their transfer station operation. It is assumed that the TAs that have contributed funding to the process will be interested in adopting the protocols at some level.

CHRISTCHURCH 15 APRIL 2015

- *Question:* How would transfer stations code landscaping loads, for example, when very busy? *Response:* If a load of landscaping waste is being diverted at the transfer station it is likely to already be coded separately but would not be included in the protocols as it is not waste to a disposal facility. It is acknowledged that at very busy periods transfer stations may not have time to ask vehicle drivers what sort of waste is being hauled (if it's not able to be visually identified). While developing the protocols it has been recognised that 100% accuracy is not feasible.
- *Comment:* Query regarding activity source codes.
- *Comment:* Query how stuff will be coded at weighbridge – available software 'inept' and does not enable easy coding of activity source. *Response:* Most weighbridge software packages already include dozens or hundreds of product codes. As transfer stations and disposal facilities only need to gather data on 'general users', adopting the protocols would likely involve adding no more than five to ten new codes.
- *Comment:* Coding general user activity source will cost extra. Why will RTS operators want to spend money on gathering data for others to use? *Response:* If the RTS is operated by, or on behalf of, a TA, the TA will want the data for its next waste assessment. There is less incentive for commercially-operated RTSs.

- *Comment:* Some 'collectors' move waste out of district – might be hard to track if they are a general user.
- *Comment:* Commercial confidentiality – any attempt to aggregate data will reveal the piece of the pie that each person holds. *Response:* This will always be an issue in a market dominated by two large players, regardless of how the data is collected and presented by TAs.
- *Comment:* Would like default compositions for the different activity sources made available.
- *Comment:* Regional councils might have better overview of cross-boundary movements etc within region. *Response:* The involvement of regional councils in the waste space varies widely between the different regions. In some areas, it may be appropriate for the regional council to play a role in implementing the Framework.

Appendix 3 – WasteMINZ Roundup Presentation



INTRODUCTION

- July 2013 WasteMINZ applied to the WMF
- Application made with the support of a wide cross-section of the industry
- WasteMINZ - project managers
- Waste Not and Eunomia - project consultants

At the bottom of the slide, there are three logos: 'waste minz' on the left, 'WasteNot Consulting' in the center, and 'eunomia research & consulting' on the right.

FUNDING PARTNERS

- WasteMINZ
- Auckland Council
- Bay of Plenty Regional Council
- Combined Canterbury Councils
- Environment Canterbury
- Far North District Council
- Gisborne District Council
- Kapiti Coast District Council
- Marlborough District Council
- Palmerston North City Council
- Porirua City Council
- South Waikato District Council
- Tasman District Council
- Taupo District Council
- Waikato Regional Council
- Waitaki District Council
- Wellington City Council

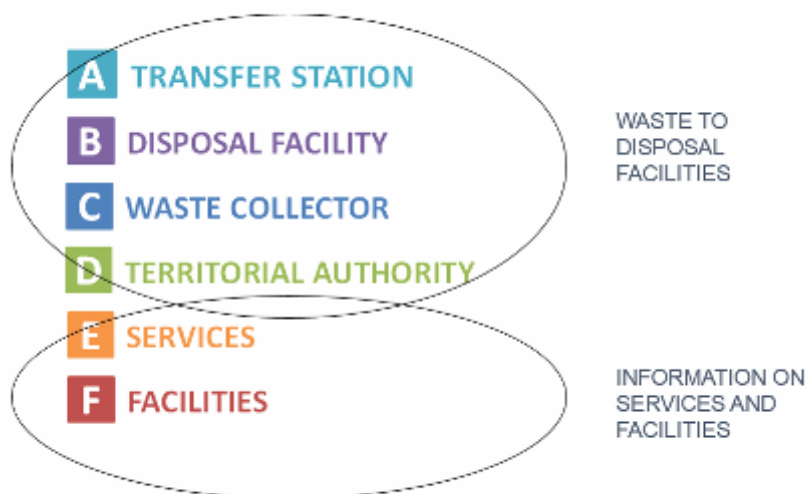
FORM OF THE FRAMEWORK

- A staged-approach, focusing initially on key elements while setting out a clear 'upgrade' path to include other elements
- The **first** stage includes:
 - data on waste disposed of at levied disposal sites
 - information on waste services and infrastructure
- **Next** stages focus on diverted materials and waste disposed of at non-levied disposal sites

PROTOCOLS AND DEFINITIONS

- A protocol describes who provides what information to whom and what is done with it
- Definitions ensure everybody is talking about the same thing when they use a term

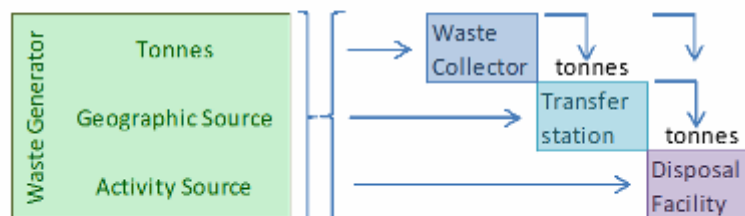
DRAFT PROTOCOLS



THE BASIC DATASET FOR WASTE TO DISPOSAL FACILITIES

- How many tonnes are going to disposal facilities, broken down by activity source and where it's from.

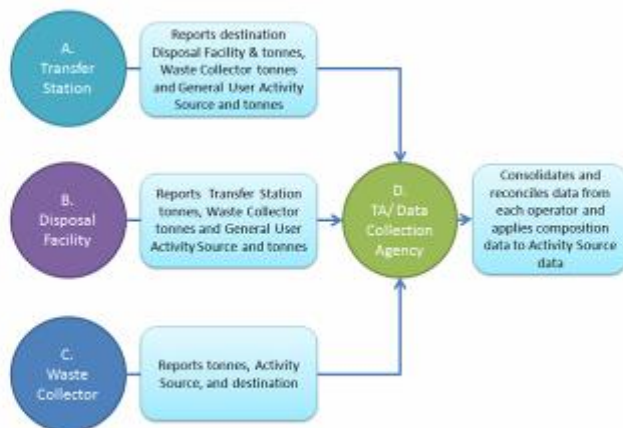
OUR SIMPLE WASTE FLOW MODEL



•Activity Sources:
C&D
Domestic kerbside
Industrial/commercial/institutional
Landscaping

•Residential
Special
Virgin excavated natural material

HOW THE DATA FLOWS



MORE REGULATION = BETTER DATA



	1	2	3	4	5	6
Services						
Levied site						
Non Levied site						
Small						

WHAT WILL THE BENEFITS BE?

QUOTES FROM RANDOM WASTE ASSESSMENTS:

- While the council has reliable data on the waste flows that it controls, **data on those services provided by private industry is very limited.**
- Due to perceived conflicts of interest and the expressed concerns of waste operators with regard to published information giving competitors (including the Council) a market advantage, **limited information and data was obtained from private operators.**

MORE QUOTES FROM WASTE ASSESSMENTS:

- This inventory is not to be considered exhaustive, particularly with respect to the commercial sector / private waste industry, as these services are subject to change and **information is not readily accessible.**
- For the purposes of this assessment, available information has been compiled and **there is generally less information and detail regarding the private waste industry.**

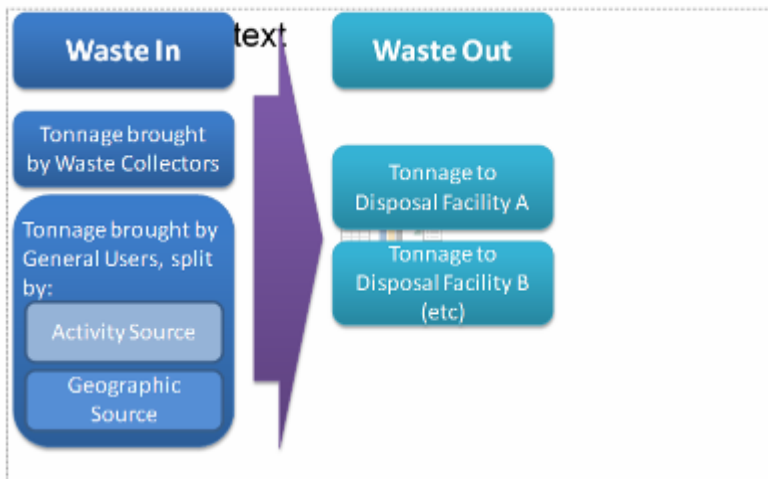
STILL MORE QUOTES FROM WASTE ASSESSMENTS:

- **There is a lack of robust and accurate waste and diverted material data** held by Council for the City, especially related to the private sector provided services.
- **Council does not have accurate up-to-date information available to them** on the tonnage of material being sent from the district to landfill, due to this information being undertaken by private contractors and limited reporting requirements in place.

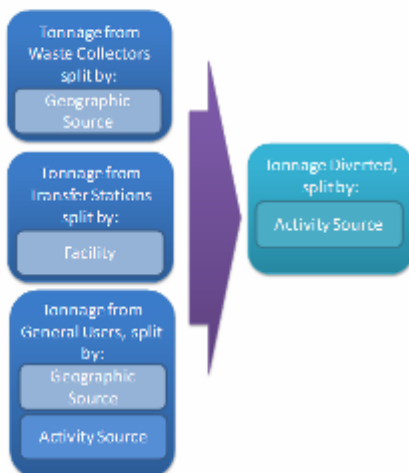
HOW DO TAs GET THE DATA?

- Smile and ask politely
- Introduce a bylaw, smile, and ask politely

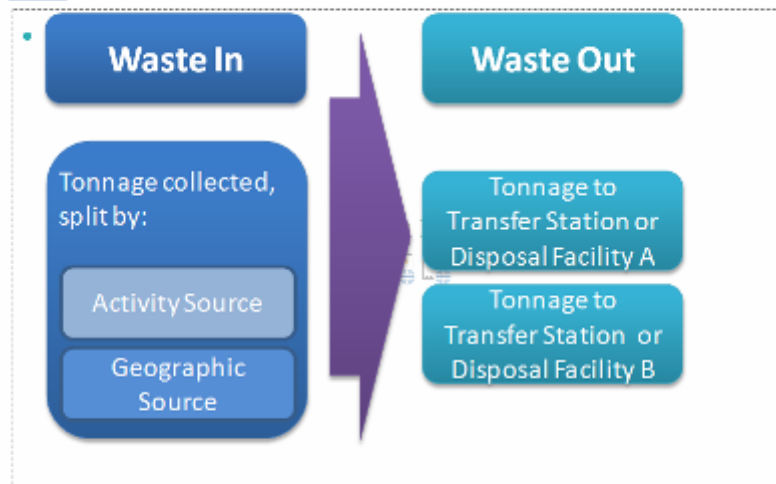
A TRANSFER STATION



B DISPOSAL FACILITY



C WASTE COLLECTOR



D TERRITORIAL AUTHORITY

D.4 Data Collected

Waste Collectors	Collected tonnes	Activity Source	Tonnes to Disposal Facility/Transfer Station 1 Tonnes to Disposal Facility/Transfer Station 2
		Geographic source	
Transfer Stations	Waste Collector tonnes		Tonnes to Disposal Facility 1 Tonnes to Disposal Facility 2 Tonnes to Disposal Facility 3
	General User tonnes	Activity Source	
		Geographic source	
Disposal Facility	Waste Collector tonnes	Geographic source	Total split by Activity Source
	Transfer Station tonnes	Geographic source	
	General User tonnes	Activity Source	
		Geographic source	

E SERVICES

- E.2 Information to gather on each service
 - Type of service
 - Quantity collected
 - Composition
 - Coverage
 - Restrictions (e.g. licensing, contract expiry etc)
 - Ownership

F FACILITIES

- F.2 Information to gather on each facility
 - Type of facility
 - Capacity
 - Composition
 - Coverage
 - Restrictions (e.g. licensing, contract expiry etc)
 - Ownership
 - Outputs

WHAT WILL THE BENEFITS BE?

- More complete information on all waste flows in district, including both council- and private-controlled waste
- More detailed information on both council- and private-controlled waste
- Ability to assess effectiveness of current elements of waste policy
- Ability to target and monitor waste minimisation initiatives
- Ability to benchmark against what other councils are accomplishing

WHAT WILL THE BENEFITS BE?

- Measure council control of waste

Type of waste	T/annum 2011/2012	% council-controlled	% private-controlled	Total
Landfilled waste	44,000 T/annum	14%	86%	100%
Recycled waste	20,070 T/annum	42%	58%	100%
Composted waste	19,124 T/annum	97%	3%	100%
Cleanfilled waste	25,000 T/annum	40%	60%	100%
OVERALL WASTE	108,194 T/annum	40%	60%	100%

Council-controlled waste materials are those of which possession is taken by Council or council contractors at any point between generation and final disposal (whether through landfilling or recovery).

FEEDBACK ON DRAFT PROTOCOLS

- Documents and online survey at <http://www.wasteminz.org.nz/about/national-waste-data-framework-project/stakeholder-consultation/>
- Contact Bruce Middleton or Duncan Wilson
- Closes 1 May

Appendix 4 – WasteMINZ email to members

Dear Bruce

As a valued WasteMINZ stakeholder, we are contacting you to give you the opportunity to provide feedback, as part of our consultation on the National Waste Data Framework Project.

Background:

The lack of good quality, consistent waste data, prevents both the public and private sectors in New Zealand from effectively planning, monitoring, and reporting on waste issues and developing and prioritising appropriate solutions. In response to these issues, WasteMINZ, in consultation with industry, and with support from central, regional, and local government, has developed the National Waste Data Framework project. The National Waste Data Framework project has received support from the Government's Waste Minimisation Fund and is due to be completed in August 2015.

Progress to date:

- As part of Milestone Two of the project we developed DRAFT definitions and protocols (there are two protocols -Waste to Disposal Facilities, and Information on Waste and Diverted Material Facilities)
- We are now undertaking Milestone Three, which is focussed on consultation with stakeholders on the DRAFT definitions and protocols.
- Consultation closes on Friday 1 May 2015. [Please find the details of the consultation process by clicking here.](#) A brief summary is provided below.

Consultation Documents:

There are three key documents, these being:

1. Stakeholder consultation document (we recommend you read this first)
2. The DRAFT definitions and protocols (we recommend you read these second). There are two protocols, these being:
 - a. Waste to Disposal (Definitions and Protocols – Consultation Draft)
 - b. Services and Facilities (Definitions and Protocols – Consultation Draft)

[You can view all of the consultation documents here.](#)

Your feedback:

Our preferred method for feedback is through our online survey tool. [You can view the survey here.](#)

Before providing your feedback online, we recommend you do the following:

1. Read our stakeholder consultation document, which explains the background to the project, what the project includes, and why we have chosen this approach. A range of frequently asked questions and answers are also provided.
2. Review the DRAFT protocols (there are two protocols on which feedback is being sought – Waste to Disposal Facilities and Information on Waste and Diverted Material Facilities).
3. Attend one of our consultation workshops

You can also provide feedback at one of the consultation workshops, or directly to the project's technical consultants [Duncan Wilson](#) or [Bruce Middleton](#).

Consultation workshops:

Four consultation workshops and one information session have been organised, to ensure that you are well briefed on the project and the approach we have chosen. Between 13 and 15 April there are workshops being held in:

- Wellington
- Christchurch
- Auckland, and via online webinar

There will also be an information session at the WasteMINZ Roundup on 23 April.

[For full details of the workshops and to register your place, please click here.](#) We would like to extend our sincere thanks to [Tonkin & Taylor](#) for their support in hosting our Wellington and Christchurch consultation workshops.

We need your feedback:

To ensure that we develop a National Waste Data Framework which is fit-for-purpose, we need your input. We would encourage you to get involved, review the documents, attend a consultation workshop and provide your feedback.

We look forward to hearing from you.

Paul Evans

CEO

Carole Inglis

MEMBERSHIP MANAGER

WasteMINZ

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Auckland, 0757, New Zealand
www.wasteminz.org.nz

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P: (09) 476 7163
M: 021 411 643

Appendix 5 – WasteMINZ website information

Stakeholder Consultation

The lack of good quality, consistent waste data prevents both the public and private sectors in New Zealand from effectively planning, monitoring, and reporting on waste issues and developing and prioritising appropriate solutions.

In response to these issues WasteMINZ, in consultation with industry, and with support from central, regional, and local government developed the National Waste Data Framework project.

The National Waste Data Framework project has received support from the Waste Minimisation Fund and is due to be completed in August 2015.

As part of Milestone Two of the project we developed DRAFT definitions and protocols (there are two protocols on which feedback is being sought – Waste to Disposal Facilities and Information on Waste and Diverted Material Facilities, you can view these below). We are now undertaking Milestone Three, which is focussed on consulting with stakeholders on the DRAFT definitions and protocols.

Consultation closes on **Friday 1 May 2015**. Please find the details of the consultation process outlined below, as well as all relevant consultation documents.

For more information on the project in its entirety, [please visit the project webpage](#).

Consultation documents:

- 1) [Stakeholder consultation document \(please read this first\)](#).
- 2) The DRAFT definitions and protocols (please read these second).
 - [Waste to Disposal \(Definitions and Protocols – Consultation Draft\)](#)
 - Services and Facilities (Definitions and Protocols – Consultation Draft)

Your feedback:

Our preferred method for feedback is via our online survey tool. [You can view the survey here](#).

Before providing your feedback online, we recommend you do the following:

- 1) [Read our stakeholder consultation document](#), which explains the background to the project, what the project includes, and why we have chosen this approach. A range of frequently asked questions and answers are also provided.
- 2) **Review the draft protocols** (there are two protocols on which feedback is being sought – [Waste to Disposal Facilities](#) and [Information on Waste and Diverted Material Facilities](#)).
- 3) **Attend one of our consultation workshops** (detailed below)

You can also provide feedback at one of the consultation workshops, or directly to the project's technical consultants [Duncan Wilson](#) or [Bruce Middleton](#).

Consultation workshops:

We have arranged four consultation workshops and one information session, to ensure that you are well briefed on the project and the approach we have chosen. We would like to extend our sincere thanks to [Tonkin & Taylor](#) for their support in hosting our Wellington and Christchurch consultation workshops.

The details of these sessions are as follows:

Wellington workshop (Monday 13 April):

- Date: Monday 13 April, 2015
- Time: 1pm to 3pm
- Venue: Tonkin & Taylor, ASB Tower, 2 Hunter Street, Wellington
- Who can attend: This workshop is open to all parties.
- Register your place: Spaces are limited. To register your spot for the Wellington workshop, please click here.

Auckland workshop and online webinar (Tuesday 14 April):

- Date: Tuesday 14 April, 2015
- Time: 10am to Midday
- Venue: WasteMINZ offices, Unit 2, 5 Orbit Drive, Rosedale, Auckland or via online webinar.
- Who can attend: This workshop is open to all parties.
- Register your place: To attend in person, please [click here](#). To register via webinar, please [click here](#).

Commercial industry workshop (Tuesday 14 April):

- Due to a lack of numbers, the commercial industry workshop has been combined with the other Auckland workshop which runs from 10am to Midday. See above.

Christchurch workshop (Wednesday 15 April):

- Date: Wednesday 15 April, 2015
- Time: 1pm to 3pm
- Venue: Tonkin & Taylor, 33 Parkhouse Road, Wigram, Christchurch
- Who can attend: This workshop is open to all parties.
- Register your place: Spaces are limited. To register your spot for the Christchurch workshop, please [click here](#).

Information session at WasteMINZ Roundup (Thursday 23 April):

- Date: Thursday 23 April, 2015
- Time: 3.30pm to 4.30pm
- Venue: Crowne Plaza Hotel, Auckland.
- Who can attend: This session is only open to those attending the WasteMINZ Roundup.
- Register your place: To register for the WasteMINZ Roundup, please [click here](#).

Appendix 6 – Do the protocols gather the right information on Waste to Disposal Facilities?

Do the protocols gather the right information on waste to disposal facilities?	
Response	Comments
Mostly	This isn't something that we regularly review or capture, so it's hard to know beyond the waste assessment for the WMMP if this will be something that we use on an on-going basis, and therefore hard to know if we will be gathering everything that we might use.
Yes	Yes, the protocols gather the right information for the first stage of the process. ----- advocates for future stages of the NWDF to include diverted materials and materials to non-levied facilities.
Yes	This is the fundamental info upon which a commercial operator's business is based. It costs operators to gather market intelligence and thus has value. Commercial operators should not be expected to provide this information free of charge and certainly not be charged an operator's license fee for the dubious pleasure of providing this information under a Bylaw.
N/A	for transfer stations is it easy to report on materials that are diverted from landfill - e.g. the metal bin that is taken to the metal recycler is weighed out over the weighbridge. Paper from recycling drop off (located at most TS) is weighed and taken to paper recycler. Same for glass etc. These types of diverted material should be included in the protocol as this information is readily available to Councils who run their own transfer stations (as part of the operational contract). If it is included, then ts operators/owners who want to report following protocol can, if ts is run by commercial party only (example TS in -----) then it is up to that operator to use the protocol for diverted if they want to do any reporting. But at least it would be qualified what the various categories for diverted materials are.
Yes	Doubt whether most disposal facilities will have or want to gather this level of data.
Mostly	Focus of protocols seem to be on reporting needed by Central government, not on what information TAs need in order to manage and improve waste generation/disposal. For example, info items on geographic source within a TA, and type of business is not covered. TA could be collecting information at a more detailed level in order to focus resources on how to take action to improve their numbers. For example TA's might need to know which suburbs are recycling more/less, or which type of businesses are increasing their waste the most.
Don't know	Most of these seem ok, although I suspect the geographical source/destination will be difficult. but I find it very hard to determine whether these are the correct protocols or not, until I have a much clearer idea as to what the information will be used for, and what benefits that will generate. This whole process seems to me to be focussing on "inputs", whereas we should be asking what do we want to achieve and why, and then determining what data we need for that purpose
Yes	I believe the current information available is insufficient and a lot could be gained by increasing it. I think it's most important to get something in place and then tune from there so I agree with the proposal.

Appendix 7 – Is there any other information on Waste to Disposal Facilities that should be gathered?

Is there any other information on waste to disposal facilities that should be gathered? If so please state what this information is and why it is important.	
Response	Comments
Yes	"Activity source" could have category for materials subject to product stewardship or priority products, given their importance under the WMA
Yes	Would be helpful to include separate category for activity 'Hospitality' waste to include materials; tourism, accommodation sector, restaurant, cafe, bar. Valuable to target services and behaviour change programmes to specific industries with accurate data and scale of problem
No	Proposed data to be gathered under the protocol will make a suitable starting point and can be expanded further over time.
Yes	see above, data on diverted materials where available, which will be at all TS and at most landfills as landfill operators need to report on waste that attracts levy, so they do report on volumes that do not attract levy (diverted material)
Yes	For example, (1) GPS points of bin lifts for collection vehicles for the load delivered to the weigh bridge. ANZIC code of businesses and (2) GPS of bin lifts for collections from business/industrial.
Yes	Information relating to UEF classification

Appendix 8 – Will the protocols for Waste to Disposal Facilities ensure the data will be accurate?

Will the protocols for Waste to Disposal Facilities ensure the data will be accurate?	
Response	Comments
Maybe..	Data supplied needs to be verifiable, by having supporting receipts or weighbridge dockets. These need not be supplied with their 'returns', but should be stored and made available if required for auditing by the TA or data collection agency.
Maybe.	It will depend on how widely the protocols are adopted. There will also still be the issue of types of waste being categorised differently by different entities, but at least the framework will go some way to reducing this
Maybe.	Requiring data from several sources (collector, transfer station, disposal facility) will provide for some cross-checking. The ability to audit - by asking for access to invoices / weighbridge dockets if required (through bylaw provisions), would greatly increase compliance.
Maybe..	Not all facilities have weighbridges, may be some inconsistency in measurement. Also possible differences in the way categories are applied. eg diverted material
Maybe..	The protocols promote a standard way of gathering and reporting data. The accuracy of the data will be somewhat dependent on the way the data is gathered and reported, and by whom – ultimately, how the protocol is implemented.
Maybe.	It will be dependent on 'buy in' and the integrity of the parties.
Maybe.	Not all facilities have weighbridges.
Yes	I imagine it will be unlikely to achieve 100% accuracy but valuable enough to use for planning purposes
Maybe.	Due to the voluntary nature, the framework has the potential to provide very detailed data from a percentage of a district, which may or may not be representative of the entire population.
Maybe.	accuracy is highly dependent on reporting, not on the protocol itself. weighbridges and electronic reporting are very accurate, it further data put into spread sheets by people.
Maybe.	Depends on whether use accurate inputs eg weigh bridge data or estimates based on vehicle size etc. For mixed loads may be hard to estimate % by weight of each category of waste.
Maybe.	Who knows unless there is a level of compulsion and auditing. I suspect most operators would take a best guess attitude if forced to report.
Maybe.	Depends on how extensive the use of weigh bridges is vs the use of 'default factor per car type'.
Maybe.	I doubt it. If data is gathered from a wide range of TA's and potentially other sources, it is likely there will always be different interpretations. So the simpler the data requirement the better; involvement of commercial operators, or looking for "difficult" data (eg source / destination), will increase inaccuracies
Maybe.	Depends on the ability of the operator to manipulate the data. If it is reported from a database by simply entering due dates then will be reliable. If it is exported to spreadsheets and then altered then potentially not so reliable.

Appendix 9 – Will the protocols for Waste to Disposal Facilities ensure there will be no significant data gaps?

Will the protocols for waste to disposal facilities ensure there will be no significant data gaps?	
Response	Comments
Maybe.	The ability to identify facilities will be a challenge. Relying on yellow pages and web searches is a slow and likely unreliable method to capture waste facilities.
Maybe.	As above, it will depend on how widely the protocols are adopted. There will also still be the issue of types of waste being categorised differently by different entities, but at least the framework will go some way to reducing this
Maybe.	There is always a need to balance the requirement for detail with the need for expediency. I think the balance is about right.
Maybe.	possibly, due to differences in way categories are applied
Maybe.	This will be dependent upon the robustness of accurate and appropriate monitoring of the reporting process.
Yes	Double negative so difficult to answer the wquestion. The information should not have any significant gaps.
Yes	What about greenwaste only sites - will these be captured down the line when cleanfill/monofill are captured?
Maybe.	The table on page 17 counts only diverted material quantities out. Many DFOs classify material as 'diverted' that does not go out and is used for engineering purposes at the landfill. The absence of a category for diverted material that remains onsite may result in a mismatch between data reported here and on OWLS. Section D6 assumes that the tonnages reported and cross checked account for all waste generated in a district. In fact, it only accounts for all the waste handled by reporting agents and facilities. Other sites such as farm dumps or non-consented fills will be receiving waste generated in the district but not visible to the framework.
Maybe.	there may be gaps for the first few years as operators will have to amend categories and qualification of waste into the prescribed categories and educate staff at facilities.
Maybe.	If it is voluntary, no everyone will do it due to additional costs, thus gaps will occur.
Maybe.	As above.
Yes	As previously discussed - the missing bit will be more detailed info that a TA can use to manage, or which can be queried when the numbers produce interesting patterns and questions start to be asked about 'why?'. Suggest taking a "generator centric" approach to data collection - which can be anonymous when sent to each TA's collection agency. Then the data can be sliced and diced as required.
Maybe.	As above. a. complexity will lead to inaccuracy, and b. hard to know whether there will be "gaps" when there's no clear definition of what we're trying to achieve.
Maybe.	How do we audit the overall picture for a waste collector to ensure if ton collected is accounted for?

Appendix 10 – Will the protocols for Waste to Disposal Facilities ensure there will be no significant overlaps in the data?

Will the protocols for Waste to Disposal Facilities ensure there will be no significant overlaps in the data?	
Response	Comments
Yes	The overlaps are useful for cross-checking data.
Maybe.	Provided tonnages from collectors and disposal facilities don't duplicate - this should be able to be eliminated by reconciliation/sense checks. There may be some issues on a regional basis - in the Wellington region we have 3 landfills, and some collectors use more than one, with waste originating from areas crossing the Councils' boundaries.
Maybe.	Overlaps and multiple data sources are in fact very useful for cross-checking (data triangulation) and auditing
No	Again, double negative so difficult to answer. All information will be doubled up, but that is necessary for the mass balance.
Yes	Transfer Station and Waste Collector are the same in this district.
Yes	The way I understand it you have three layers (transfer station, disposal facility and waste collector) all reporting tonnes, activity source and destination. Is the intent to understand how much waste is produced or where it goes or both? If both then the overlaps are unavoidable.
Maybe.	Yes if you're collecting from transfer stations and landfills. Data should all correlate if all operators are being accurate.
Maybe.	Not sure what is meant by this statement. If the waste goes to one site and is recorded why would there be an overlap?

Appendix 11 – Will the protocols for Waste to Disposal Facilities ensure the data will be consistent and able to be shared?

Will the protocols for Waste to Disposal Facilities ensure the data will be consistent and able to be shared?	
Response	Comments
Yes	MfE should take a lead role here in ensuring consistency and benchmarking
Yes	This assumes a wide adoption.
Maybe.	There are obvious commercial sensitivities with private companies sharing waste data. This will need to be adequately mitigated (through aggregation, access control, etc) to ensure accuracy and uptake of the data framework. We also need to be sure that we are not faced with a similar situation as when MfE refuses to provide waste to levied landfill data because of concerns around commercial sensitivities.
Maybe.	If TAs are required to define waste collectors, data will only be consistent if a standard definition is used.
Yes	As long as the framework is used consistently, it is anticipated that the data will be consistent. Better data consistency will make data sharing easier.
No	The information is commercially sensitive and MUST not be shared. In several areas Council's are in trade competitors in direct commercial competition with commercial Waste Operators. The Commerce Commission protocols should be check before this process could be introduced and shared with Councils.
Maybe.	If using localised collection then there will be less consistency vs one central data collector
Maybe.	Likely to be more consistent than current, but I'm very wary about the costs of collecting such data, and am as yet unaware of what benefit we expect to derive from doing so
Yes	A standardised method of describing and recording wastes should lead to the avialbility of national reliable data.

Appendix 12 – How easy is Protocol A (Transfer Stations) to follow?

How easy is Protocol A (Transfer Stations) to follow?	
Response	Comments
Ok	Difficulties around weighbridges (will all T/s have them? are weighbridges able to programmed with the appropriate codes?) Confidentiality concerns
Easy	----- does not operate waste infrastructure, but the protocol appears straight forward and easy to follow.
Hard	Theoretically easy to understand but a huge amount of effort will be required, specifically when an operator has a national presence.
Hard	with regard to the source question and preferred solution under the protocol: waste collectors will come in with bins on trucks - these trucks can be identified by rego and can be identified in the weighbridge system per truck; the waste carried in the bins however can either come from households or from commercial customers. it involves extra staff time as when the vehicle comes in staff would have to ask the where the waste is coming from this is the same for compactor trucks; all commercial collectors empty household wheeliebins/bags in the same truck as commercial wheeliebins/bags - usually if it is the regular collection day the largest percentage of the truck will be residential but there will always be commercial waste in the truck as well. geographic source: same applies. it will have to be a question from staff when the driver comes in. questions from staff makes it unreliable; a new staff member may not know of forget to ask the question acceptable or default solution are both ok but acceptable solution will cost more money and time
Hard	In our area will all be extra work and requirement to gather this data. Not sure what the incentive is for most operators.
	Depends who owns the transfer stations and what their drivers are
Hard	Lack of weighbridges at individual transfer sites but as described can use destination weighbridge for overall amount and SWAP for makeup.

Appendix 13 – How easy is Protocol B (Disposal Facilities) to follow?

How easy is Protocol B (Disposal Facilities) to follow?	
Response	Comments
Ok	I think it will be difficult to capture geographical information, as a large portion of our waste comes from commercial service providers, who have historically been reluctant to disclose any information. Also, requesting this information from our general users could potentially be too time consuming, and we will likely have some IT constraints around how we might capture this information on a regular basis
Ok	challenges around coding on weighbridges slowing down of processing through recording of data potential challenges in gathering geographic/source data.
Easy	----- does not operate waste infrastructure, but the protocol appears straight forward and easy to follow.
Hard	Theoretically easy to understand but a huge amount of effort will be required, specifically when an operator has a national presence..
Hard	To gather types of waste, origin and related quantities would be guess work in a lot of cases.
	Depends who owns

Appendix 14 – How easy is Protocol C (Waste Collectors) to follow?

How easy is Protocol C (Waste Collectors) to follow?	
Response	Comments
Ok	Bringing collectors on board with processes and gathering of information might be a challenge
Easy	---- does not operate waste infrastructure, but the protocol appears straight forward and easy to follow.
Hard	Theoretically easy to understand but a huge amount of effort will be required, specifically when an operator has a national presence.
Hard	Estimating various waste types would be very difficult.

Appendix 15 – How easy is Protocol D (Territorial Authorities) to follow?

How easy is Protocol D (Territorial Authorities) to follow?	
Response	Comments
Ok	Gathering information from commercial disposers will likely be difficult, as ---- operates in a commercial market where each service provider is reluctant to share information from a commercially sensitive point of view.
Ok	Consistency across TAs important
Easy	----- does not operate waste infrastructure, but the protocol appears straight forward and easy to follow.
Hard	Theoretically easy to understand but a huge amount of effort will be required. Not appropriate to charge waste operators a license fee for providing information that belongs to the operators in the first place. If anything, TA costs should be covered by the Levy funding that they already receive.
Hard	same as above with regard to activity source and geographic source if these data are coming from weighbridged. it can be required under a licence from collectors to provide geographic source data. for reasons mentioned above, specific provision of source data is in general not possible. assumptions can be made based on collections days in combination with weighbridge data. D6: transfer station data will include all waste collected that is disposed off at the local transfer stations. every collector will choose to dispose at the nearest ts of landfill as that is most economical time-wise. so if collectors data are added to ts data or landfill data, this results in double counting. only if in a certain TA's district there is no disposal option at all, this would make sense. if there is a TS or landfill in the district, it will be used by collectors if they can. TA's will have to verify with the local collectors where they take their waste to make sure there is no double counting. tonnes diverted as included in the TA summary chart should also be included in the TS chart/protocol, see comments under TS
Ok	For some of our collection contracts the level of detail sought is not currently collated and would require contract amendments.
Hard	Aggregation rules suffer from being in 'English paragraphs' rather than 'laid out in tables with example numbers'. Maybe try attaching a worked example in a spreadsheet format?

Appendix 16 – Any suggestions for improvements to Protocol A (Transfer Stations)?

Any suggestions for improvements to Protocol A (Transfer Stations)?
2.2 Transfer Stations - need a threshold on what is considered 'more than negligible' for out-of-district waste, e.g. 5% Do we expect data providers (for ALL protocols) to tell us often they are using 'preferred' 'acceptable' or 'default' solutions? This would be useful to be able to grade the reliability of data provided.
A national database / data repository (e.g. something along the lines of the UK's wastedataflow system) would ensure national consistency and would be much easier for data entry and analysis (users will only need to learn one system!).
3 out of 4 transfer stations do not have weighbridge, nor software for reporting. May create challenge to get accurate data
diverted materials out of the TS when taken to recyclers

Appendix 17 – Any suggestions for improvements to Protocol B (Disposal Facilities)?

Any suggestions for improvements to Protocol B (Disposal Facilities)?

2.3 Disposal Facilities - need a threshold on what is considered 'more than negligible' for out-of-district waste, e.g. 5% B.2. Will MfE be comparing or auditing data provided with that in OWLS? The requirement to report the same data in two separate systems may be considered onerous by facility operators - much better to have one national system! B.7. Diverted materials total tonnes out - how do we account for diverted materials that are used for landfill cover?

Appendix 18 – Any suggestions for improvements to Protocol C (Waste Collectors)?

Any suggestions for improvements to Protocol C (Waste Collectors)?
What about small and irregular waste collectors? Such as sole-trader trades-persons who might dispose of only small quantities of waste occasionally. Might be useful to have a threshold before requiring waste collectors to be licensed under a waste bylaw and report data, e.g. >20 tonnes/year. C.3 Need to quantify what is a 'noticeable proportion' of cross boundary waste
A recommended threshold level (e.g. 20 tonnes / year) below which operators would not need to report.
We divert a considerable quantity of household appliances, furnishings and alike as well as office furnishings and equipment, which don't really fit into the textiles category or kerbside. Most of what we pick up is moved through our charitable networks but a reasonable volume is moved through on selling.
Both residential and commercial waste is collected by same operator when picked up in Council rated service. Would be challenging to supply accurate data to split the 2.
this party knows where waste is collected and from what kind of activity first and foremost. the onus should be on waste collectors in the first instance. the weakness would be that waste collectors don't have to use the protocol unless it became mandatory under an agreement.

Appendix 19 – Any suggestions for improvements to Protocol D (Territorial Authorities)?

Any suggestions for improvements to Protocol D (Territorial Authorities)?
D.8. Composition of waste - this is very important to enable TA's to understand / plan for material and resource flows for their district/region, but I feel is only lightly touched upon here. This might be out-of-scope and require a separate protocol. D.9 Data integrity and commercial confidentiality. Data supplied needs to be able to verifiable as/when required, and invoices, etc made available for auditing and quality assurance. Where TA's own/operate waste services, the development of internal protocols to prevent data being used for operational purposes - this will need some clear guidance or protocols to help TA's and reassure private operators. These should be done at a national level - a role for MfE or WasteMinz perhaps?
SHould not be undertaken by TA's. Should be by independent 3rd aprty (if at all).
waste composition; add in for clarity where concrete is included; C&D waste? page 28: average kg per load - clarify that these weights are from recent surveys (not based on 2009 or 1999 reports) 250kg seems on the low side for a trailer.
Breakdown of Geograhic source eg coastal region, rural, urban

Appendix 20 – Are the roles and responsibilities in the protocols on Waste to Disposal Facilities clear and reasonable for transfer stations?

Are the roles and responsibilities in the protocols on Waste to Disposal Facilities clear and reasonable for transfer stations?	
Response	Comments
Don't know	The roles and responsibilities are clear however I'm not sure if they're reasonable. Concern has been raised by our transfer station operator on weighbridge matters and confidentiality concerns.
No	Clear, but not reasonable. This is the fundamental info upon which a commercial operator's business is based. It costs operators to gather market intelligence and thus has value. Commercial operators should not be expected to provide this information free of charge and certainly not be charged an operator's license fee for the dubious pleasure of providing this information under a Bylaw. In addition, TA's are trade competitors and operators should not be required to make their commercially sensitive information to such a competitor.
Yes	Again I don't understand how this will be mandated or incentivised.
N/A	"Transfer Stations" aren't a "party" - that's the owner of the transfer station. Where that is a commercial operator, they may/may not think these
Don't know	Unless there are any clear economic incentives (or penalties!), unfortunately it is probably down to available resourcing and business goals of the parties, which will most likely be fairly mixed!

Appendix 21 – Are the roles and responsibilities in the protocols on Waste to Disposal Facilities clear and reasonable for disposal facilities?

Are the roles and responsibilities in the protocols on Waste to Disposal Facilities clear and reasonable for disposal facilities?	
Response	Comments
Yes	Believe that there may be some concerns about confidentiality
No	Clear, but not reasonable. This is the fundamental info upon which a commercial operator's business is based. It costs operators to gather market intelligence and thus has value. Commercial operators should not be expected to provide this information free of charge and certainly not be charged an operator's license fee for the dubious pleasure of providing this information under a Bylaw. In addition, TA's are trade competitors and operators should not be required to make their commercially sensitive information to such a competitor.
Yes	Again I don't understand how this will be mandated or incentivised.

Appendix 22 – Are the roles and responsibilities in the protocols on Waste to Disposal Facilities clear and reasonable for waste collectors?

Are the roles and responsibilities in the protocols on Waste to Disposal Facilities clear and reasonable for waste collectors?	
Response	Comments
Don't know	Would need to be a consistent national approach on definition of Collectors. Our Council is keen to observe the Auckland Bylaw for some time. Is difficult to track down all the businesses that may fit the definition.
No	Clear, but not reasonable. This is the fundamental info upon which a commercial operator's business is based. It costs operators to gather market intelligence and thus has value. Commercial operators should not be expected to provide this information free of charge and certainly not be charged an operator's license fee for the dubious pleasure of providing this information under a Bylaw. In addition, TA's are trade competitors and operators should not be required to make their commercially sensitive information to such a competitor.
Yes	Again I don't understand how this will be mandated or incentivised.

Appendix 23 – Are the roles and responsibilities clear and reasonable for central government?

Are the roles and responsibilities clear and reasonable for central government?	
Response	Comments
No	MfE needs to be involved here - it is a shame they are not pursuing a national waste data collection system, such as the UK's WasteDataFlow. This would be more efficient than multiple reporting to multiple agencies.
Yes	It is interesting to note that Central Government will be one of the main users of waste data yet don't want to participate at this stage in the development of the framework.
No	Central government really needs to mandate a national waste data system - would save much duplication of effort for all stakeholders. Have MfE done any kind of cost/benefit analysis of having a national waste data system compared with one that is rolled out at a TA or regional level? It is unclear what, if any, role MfE would have here. A benchmarking and auditing role would be a good start for MfE.
Yes	Will the National Waste Data Framework tie in with the MfE-led development of the National Monitoring System (NMS) and is it likely that reporting (by all areas of the waste sector) will ever become mandatory? Wherever there is an element of voluntary data capture, New Zealand will never have a complete uptake of the framework and the ultimate vision of a robust, national data set is unlikely to be realised. It is clear through the framework what MfEs role is, but it is unclear why it has chosen to have no stated role where there is clearly a requirement for national leadership, considering it is already active in this area through NMS.
No	there is no role for central government described in the protocols. why not? why could it not state that a potential future role like a national data bank hosted by MfE could be considered?

Appendix 24 – How likely is it that your TA would use Protocol D?

For TAs only, please indicate how likely your TA would be to use protocol D (including when preparing your next waste assessment or implementing a solid waste bylaw):

Response	Please provide a reason for your answer
Likely	We already have a solid waste bylaw and data requirements associated with licensing waste operators.
Likely	We are part-way through collating our data, however, we will use the protocol to identify any gaps in our data collation and to also generally test the protocol.
Likely	We already are rolling out a similar method through our waste by-law.
Definitely	Doing it just now.

Appendix 25 – Are there any elements of Protocol A (Transfer Stations) that your organisation would have difficulty putting into practice?

For Waste Collectors, Disposal Facility Operators, and Transfer Station Operators only, are there any elements of Protocol A (Transfer Stations) that your organisation would have difficulty putting into practice?

Response	Comments
Yes	This is the fundamental info upon which a commercial operator's business is based. It costs operators to gather market intelligence and thus has value. Commercial operators should not be expected to provide this information free of charge and certainly not be charged an operator's license fee for the dubious pleasure of providing this information under a Bylaw. In addition, TA's are trade competitors and operators should not be required to make their commercially sensitive information to such a competitor. Finally, the confidentiality of information can not be guaranteed by a TA should a request be made under LOGOIMA. Only solution would be to compensate the operator for providing this information, guaranteeing confidentiality by providing it to a 3rd party with measures to ensure it is only reported at a national level. It should be a national mandatory requirement led by Government, not TA's. Central govt should cover costs by reducing distribution of Levy monies to TA, as is currently the case.
Yes	Tonnage data

Appendix 26 – Are there any elements of Protocol B (Disposal Facilities) that your organisation would have difficulty putting into practice?

For Waste Collectors, Disposal Facility Operators, and Transfer Station Operators only, are there any elements of Protocol B (Disposal Facilities) that your organisation would have difficulty putting into practice?

Response	Comments
N/A	Collection of geographic information: from waste collectors -reluctance to provide information, cross boundary waste transfer; from general users - time and IT constraints, as most domestic users come at the weekends when it is typically very busy. Potentially an overlap of tonnages provided from collectors and those that we capture through our landfill. Will need to look at processes for ensuring there is not duplication.
Yes	This is the fundamental info upon which a commercial operator's business is based. It costs operators to gather market intelligence and thus has value. Commercial operators should not be expected to provide this information free of charge and certainly not be charged an operator's license fee for the dubious pleasure of providing this information under a Bylaw. In addition, TA's are trade competitors and operators should not be required to make their commercially sensitive information to such a competitor. Finally, the confidentiality of information can not be guaranteed by a TA should a request be made under LOGOIMA. Only solution would be to compensate the operator for providing this information, guaranteeing confidentiality by providing it to a 3rd party with measures to ensure it is only reported at a national level. It should be a national mandatory requirement led by Government, not TA's. Central govt should cover costs by reducing distribution of Levy monies to TA, as is currently the case.

Appendix 27 – Are there any elements of Protocol C (Waste Collectors) that your organisation would have difficulty putting into practice?

Are there any elements of Protocol C (Waste Collectors) that your organisation would have difficulty putting into practice?	
Response	Comments
Yes	This is the fundamental info upon which a commercial operator's business is based. It costs operators to gather market intelligence and thus has value. Commercial operators should not be expected to provide this information free of charge and certainly not be charged an operator's license fee for the dubious pleasure of providing this information under a Bylaw. In addition, TA's are trade competitors and operators should not be required to make their commercially sensitive information to such a competitor. Finally, the confidentiality of information can not be guaranteed by a TA should a request be made under LOGOIMA. Only solution would be to compensate the operator for providing this information, guaranteeing confidentiality by providing it to a 3rd party with measures to ensure it is only reported at a national level. It should be a national mandatory requirement led by Government, not TA's. Central govt should cover costs by reducing distribution of Levy monies to TA, as is currently the case.

Appendix 28 – Do you have any other comments or suggestions on the Definitions and Protocols for Waste to Disposal Facilities?

Do you have any other comments or suggestions on the Definitions and Protocols for Waste to Disposal Facilities?
2.1 (5) How often is 'on a regular basis'? More regularly than when completing the WA, such as annual. Its very important that data are released in an aggregated form, for bench-marking. Some protocols on storage, aggregation and release of data would help. A.6 Geographic source - need to define what 'significant proportion' is 5. Waste Data Definitions. C&D Waste - exclude loads of exclusively green waste? What category does litter or illegal dumping fit into? Where does product stewardship waste fit - I think should have its own category.
If the framework is widely adopted it will make things a lot easier in comparing trends of waste firstly just on a regional basis, and then being able to benchmark against national trends. Potentially a huge step forward!
I think it has been excellently thought through and well delivered.
Are WasteMINZ representing all of their stakeholders by pursuing this project. This should be led by Central Government if there is a national need.
Tie timing of final year data into existing TA annual plan reporting to reduce duplication
Very clear and definitive. Common sense approach

Appendix 29 – Do the protocols gather the right information for Waste and Diverted Material Services and Facilities?

Do the protocols gather the right information for Waste and Diverted Material Services and Facilities?	
Response	Comments
Mostly	This isn't something that we regularly review or capture, so it's hard to know beyond the waste assessment for the WMMP if this will be something that we use on an on-going basis, and therefore hard to know if we will be gathering everything that we might use.
Yes	Yes, the protocols gather the right information for the first stage of the process. ----- advocates for future stages of the NWDF to include diverted materials and materials to non-levied facilities.
No	We currently divert 70% from landfill. Some of this is to recycle facilities and quarry's which measure tonnage. However, approximately, 40% to 50% can only be measured in volume terms. We do collect this data as it forms a large part of our measurable point of difference.
Don't know	I haven't considered for diverted material.
Yes	would like further breakdown of location eg rural urban coastal
Don't know	Will be interesting to see what information comes in and then adjust from there. I think it's great an attempt at drawing a line in the sand has been made!

Appendix 30 – Is there any other information on Waste and Diverted Material Services and Facilities that should be gathered?

Is there any other information on Waste and Diverted Material Services and Facilities that should be gathered? If so please state what this information is and why it is important.	
Response	Comments
Yes	Product Stewardship materials
Don't know	This isn't something that we regularly review or capture, so it's hard to know beyond the waste assessment for the WMMP if this will be something that we use on an on-going basis, and therefore hard to know if we will be gathering everything that we might use.
Yes	Waste is diverted along the pipeline, not only at the Waste Disposal facility. A theoretical mass balance as proposed might lack accuracy.
Yes	Waste sent out of NZ

Appendix 31 – Will the protocols for Services and Facilities ensure there data will be accurate?

Will the protocols for Services and Facilities ensure there data will be accurate?	
Response	Comments
Maybe.	This will, as with all other points, depend on how widely the framework is adopted.
Maybe.	Providing there is a consistency approach across facilities and districts
Maybe.	The protocols promote a standard way of gathering and reporting data. The accuracy of the data will be somewhat dependent on the way the data is gathered and reported, and by whom – ultimately, how the protocol is implemented.
Maybe.	It will be dependent on good management, reporting and work practices of the facilities.
Maybe.	Due to the voluntary nature, the framework has the potential to provide very detailed data from a percentage of the district which may or may not be representative of the entire population.
Maybe.	accuracy does not depend on the protocol but on the use of the protocol by the individual user

Appendix 32 – Will the protocols for Services and Facilities ensure there will be no significant data gaps?

Will the protocols for Services and Facilities ensure there will be no significant data gaps ?	
Response	Comments
Maybe.	E.9 Preferred solution of using yellow pages, internet, etc is time-consuming and clunky. A national, web-based portal to get this information would be far more efficient and reliable.
Maybe.	This will, as with all other points, depend on how widely the framework is adopted.
No	It will depend on the level of buy in and the integrity of the operators.
Maybe.	Where TAs own and operate waste infrastructure and services in a district, it is likely to be difficult to get commercial operators to provide their data if the TA is the central data collecting agent in these circumstances (ie their competitor). A number of councils may find the preferred options in the protocols too onerous or resource intensive, which may limit uptake and therefore the completeness of the national data set.
No	there will be significant gaps as TA's will not be able to obtain data easily from collectors or facilities they have no contractual relationship with or do not licence. diverted material collectors and facilities cannot be licenced at this moment.

Appendix 33 – Will the protocols for Services and Facilities ensure there will be no significant overlaps in the data?

Will the protocols for Services and Facilities ensure there will be no significant overlaps in the data?	
Response	Comments
Yes	Useful to enable triangulation of data.
Maybe.	Concern that there will be an overlap on capacity of facilities &/or services - one facility is likely to cover more than one Council; for example in Wellington City, our recycling is processed by a facility based in Lower Hutt that will be servicing more than one Council. How do we get round this as a region to make sure that we are not all capturing the total capacity of the facility. Likewise, e-Waste and scrap metal etc.
Maybe.	Double reporting throughout due to attempts to run a mass balance.
Maybe.	The protocol states that where an entity falls under both 'service' and 'facility' it should be reported under each category - would this lead to double counting of tonnages?
Maybe.	with regard to the location/coverage; why is it relevant for a WA to break down within a TA area? if there are 2 ts and one landfill, users will most like use the one that is closest to their hh or business. this is not a given though, as especially commercial users will try to get special disposal fees at certain ts or landfills and will dispose there for that reason. also, some TS may accept more types of waste than others and that may be a reason why most residents use that TS.

Appendix 34 – Will the protocols for Services and Facilities ensure the information will be consistent and able to be shared?

Will the protocols for Services and Facilities ensure the information will be consistent and able to be shared?	
Response	Comments
Maybe	Providing consistency of approach
Yes	As long as the framework is used consistently, it is anticipated that the data will be consistent. Better data consistency will make data sharing easier.
N/A	This is the fundamental info upon which a commercial operator's business is based. TA's are trade competitors and operators should not be required to make their commercially sensitive information to such a competitor. As such, the information can not be shared. Finally, the confidentiality of information can not be guaranteed by a TA should a request be made under LOGOIMA. Only solution would be to guarantee confidentiality by providing it to a 3rd party with measures to ensure it is only reported at a national level. It should be a national mandatory requirement led by Government, not TA's.
Maybe.	when the definitions are used by all in the same manner, data can be consistent the protocol is not clear when it comes to cleanfill when compared to the other protocol. in the disposal protocol aggregate is not mentioned so it is assumed that aggregate is included in demolition waste. here aggregate is mentioned and it should be as it is cleanfill (potentially when it does not contain steel) and not VENM. Especially cleanfill is reported often as diverted material as it is used for landfill capping purposes. Sludges is also unclear? Biosolids/sludge is included in waste to disposal (further qualified as municipal waste. This may result in double counting so should be clarified.

Appendix 35 – How easy is Protocol E (Services) to follow?

How easy is Protocol E (Services) to follow?	
Response	Comments
Ok	Some confusion about annual quantities - is this the service as a whole or just relating to the portion that is ----- specific. For our rubbish collection, we piggyback off the contractors commercial collections, and therefore we may not get an accurate representation of composition, source or volumes specific to -----
Hard	easy to follow but a huge amount of work.
Ok	Could consider providing for protocols relating to the receptacle (for kerbside collections etc) - this information is often referred to in TA waste assessments and helps TAs evaluate whether there needs to be a change in how services operate (bin versus bag etc)
Hard	for TA's: most TA will not have specific data in their solid waste team on road sweepings, loose litter collection as this is incorporated in roading contracts. changes can be made to incorporate and obtain those data but that will take time. this could be the same for illegal dumping if the solid waste team is not responsible for the actual collection of illegal dumping. composition; see previous - E5 references cleanfill - all protocols should use the same terminology; VENM, C&D - why now use 'rubble' if it is the same as C&D definition?

Appendix 36 – How easy is Protocol F (Facilities) to follow?

How easy is Protocol F (Facilities) to follow?	
Response	Comments
Ok	Confusion around capacity. Concern that there will be an overlap on capacity of facilities &/or services - one facility is likely to cover more than one Council; for example in -----recycling is processed by a facility based in ----- will be servicing more than one Council. How do we get round this as a region to make sure that we are not all capturing the total capacity of the facility. Likewise, e-Waste and scrap metal etc.

Appendix 37 – Any suggestions for improvements to the protocols on Services and Facilities?

Any suggestions for improvements to the protocols on Services and Facilities?

2.1 TA's / Data Collection Agent Role and Responsibilities. (5) Maintain the data on at least an annual basis - this is very different to that required in the protocols for waste to disposal facilities, which requires the data to be collated, assessed and reported into the public domain. F.2 Capacity. As well as maximum capacity, average throughput would be useful. F.3 Classification / Diverted materials. "Dropoff" - is this the same as self-haul? I assume multiple selections would be allowed for in F.3 as many facilities are multi-purpose. F.9. Outputs / Organic Waste. Should include: CLO (compost-like output), AD digestate and bio-solids

It costs operators to gather market intelligence and thus has value. Commercial operators should not be expected to provide this information free of charge and certainly not be charged an operator's license fee for the dubious pleasure of providing this information under a Bylaw.

Paragraph 1.3 is titled 'Waste Characteristics' but in fact discusses facilities characteristics

Appendix 38 – Are the roles and responsibilities in the protocols on Services and Facilities clear and reasonable for TAs/Data Collection Agents?

Are the roles and responsibilities in the protocols on Services and Facilities clear and reasonable for TAs/Data Collection Agents?	
Response	Comments
No	No, not reasonable.

Appendix 39 – Are the roles and responsibilities in the protocols on Services and Facilities clear and reasonable for Waste and Diverted Material Service Operators?

Are the roles and responsibilities in the protocols on Services and Facilities clear and reasonable for Waste and Diverted Material Service Operators?	
Response	Comments
Yes	Commercial operators very concerned about confidentiality, work load and cost.
No	No, not reasonable.

Appendix 40 – Are the roles and responsibilities in the protocols on Services and Facilities clear and reasonable for Waste and Diverted Material Facility Operators?

Are the roles and responsibilities in the protocols on Services and Facilities clear and reasonable for Waste and Diverted Material Facility Operators?	
Response	Comments
No	No, not reasonable.
Maybe	I think it would be clearer to incorporate this protocol into the disposal facilities protocol as that is what they are and rename that protocol waste and diverted material facilities. A majority of facilities is exactly that; a combination of both. that is why these facilities can often measure diverted material in and out of the facility/ts.

Appendix 41 – Are the roles and responsibilities in the protocols on Services and Facilities clear and reasonable for central government?

Are the roles and responsibilities in the protocols on Services and Facilities clear and reasonable for central government?	
Response	Comments
No	MfE should be involved in a national waste database
Yes	Will the National Waste Data Framework tie in with the MfE-led development of the National Monitoring System (NMS) and is it likely that reporting (by all areas of the waste sector) will ever become mandatory? Wherever there is an element of voluntary data capture, New Zealand will never have a complete uptake of the framework and the ultimate vision of a robust, national data set is unlikely to be realised. It is clear through the framework what MfEs role is, but it is unclear why it has chosen to have no stated role where there is clearly a requirement for national leadership, considering it is already active in this area through NMS.
No	there is no role which is too convenient - there should be a mention of a potential role in the future (refer to WRAP in UK)

Appendix 42 – How likely is it that your TA would use the protocols on Services and Facilities?

For TAs only, please indicate how likely your TA would be to use protocols E and F (including when preparing your next waste assessment):

Response	Please provide a reason for your answer
Likely	Any framework will be a positive step in the direction of allowing for regional and national trend comparison
Likely	We are currently part-way through our assessment process and will likely utilise to ensure there are no gaps in our data and that to test the Protocol generally.

Appendix 43 – Are all key terms defined in the definitions in the Framework?

Are all key terms defined in the definitions in the Framework?	
Response	Comments
N/A	It just leaves the Question of the volume of unmeasured diverted waste.

Appendix 44 – Are all definitions clear in the Framework?

Are all key terms clear in the definitions in the Framework?	
Response	Comments
Maybe	It is unclear the differentiation between 'education facility' and 'education service' - do you mean buildings/community centres/eco centres or education programmes?
Maybe	see comments on cleanfill/ C&D/ VENM and Rubble - this should be clear cut and make no discussion possible sludges; same see earlier comments - especially biosolids - clarify to prevent discussions where this waste stream is included - it would be good for future development of reuse options if this was a separate waste stream

Appendix 45 – Are all definitions functional in the Framework?

Are all definitions functional in the Framework?	
Response	Comments
Maybe	Don't believe TA's will be able to get an accurate feel of waste composition or source if confidentiality is truly guaranteed.

Please indicate if you think there are other terms that need to be defined. Please include any suggested definitions:	
Comments	
Definitions are broadly similar to what we have used in our waste by-law for the ----- region. Please refer previous comments I have made in other sections on specific definitions.	

Appendix 46 – Rate “TAs being primarily responsible for implementing the Framework” in terms of how much you would like to see this option taken forward.

Rate “TAs being primarily responsible for implementing the Framework” in terms of how much you would like to see this option taken forward	
Response	Comments
Bad idea	There will be little or variable uptake by TAs, reducing its effectiveness.
Good idea	TAs are primarily responsible for their waste assessments so this makes logical sense.
Great idea	Reliant on having the ability to obtain accurate and reliable data easily from third parties.
OK idea	This provides for the fastest implementation solution as the regulatory framework is already in place. However, this also would be the most fragmented option by working on a voluntary basis. Data accuracy may also suffer if TAs gather data in slightly different ways – having more data gatherers opens up more room for error. Being the most localised option and giving the lowest form of data aggregation, industry may be reluctant to share data with TAs for commercial sensitivity reasons.
Bad idea	Not consistent. Can not guarantee confidentiality and are a trade competitor.

Appendix 47 – Rate “A Data Working Group is established” in terms of how much you would like to see this option taken forward.

Rate a 'Data Working Group' or similar is established to oversee framework implementation and data issues on an ongoing basis	
Response	Comments
Good idea	As a 'bolt-on' to whatever other option is chosen.
Good idea	I like the idea of a more directed approach to attempting to implement the framework on a wider basis.
Great idea	A body is needed to oversee and advocate the use of the framework or it may risk becoming obsolete. Having this body would help maintain accuracy of waste data gathered under the framework. ----- fully supports this option and would like to see this group set up to fulfil a much needed leadership role.
Bad idea	Consultants do not volunteer. They require payment and have a vested interest in this project. Waste operators should not be required to pay to provide information that they already own.
Not a good idea	unclear whether this option relates to 'implementation' of the pathway or ongoing involvement (eg. central data hub) Query whether WasteMINZ would sufficiently represent commercial operators
Not a good idea	TA's are responsible for WA every 5 years and should on that basis have ownership of the data stream they use - the quality of their own assessment will depend on their own action, not on someone else's. unclear how a data working group would work if TA's still need to provide the data - this just seems like an extra level that slows down the process. a data base that can be accessed by all TA's and commercial parties for their data (cloud based) and hosted by Wasteminz would be great.

Appendix 48 – Rate “TAs using solid waste bylaws to introduce waste operator licensing” in terms of how much you would like to see this option taken forward.

TAs use solid waste bylaws to introduce waste operator licensing that require the provision of waste data as part of the license conditions	
Response	Comments
Bad idea	Requiring TAs to license and report waste data is another administrative burden on them, and many smaller TAs may struggle to adequately resource the bylaw data. As well, TAs are often competing in the waste marketplace, so commercial operators may be reluctant to share data with them due to concerns over commercial confidentiality and inappropriate use of their data.
OK idea	This would work, but is unlikely to happen in Wellington any time in the near future.
OK idea	This would provide for a greater quantity of data but would still require TAs to voluntarily put bylaws in place, which is largely a political decision. The financial and resourcing cost of implementing bylaws may be beyond a number of TAs, despite the ability to recover some cost through licensing fees. Similar to option 1, industry may be reluctant to share data with TAs at a local level for commercial confidentiality reasons. It is also anticipated that should TAs put a bylaw in place commercial operators would require licenses (and fees) in all NZ districts, which would be onerous and work against the acceptability of the framework in the long-term.
Bad idea	Not consistent. Can not guarantee confidentiality and are a trade competitor.
OK idea	Should note the resourcing implications of this for TAs, both in terms of implementation and ongoing enforcement of the bylaws. Is there potential to use model bylaws to mitigate the risk of variable implementation?
Not a good idea	this information can also be obtained by including it in contract documents (with a cost component)
Great idea	I believe this is absolutely necessary.

Appendix 49 – Rate “TAs mandate regional councils to establish consistent bylaws” in terms of how much you would like to see this option taken forward.

TAs mandate regional councils to establish regionally consistent solid waste bylaws that include waste operator licensing requiring the provision of waste data as part of the license conditions	
Response	Comments
Good idea	This option has some merit as RCs already collect a lot of environmental data and have better capability to collect waste data than many TAs. There are also less likely to be confidentiality concerns (as RCs are unlikely to compete in the waste marketplace, though many Unitary Authorities, such as AC, offer waste services). Regional licensing could reduce licensing and reporting costs and burdens for waste operators, as there would be fewer authorities to report waste data to.
Not a good idea	Individual TAs would lose control, although it would allow for a regional consistency. Would rather that we worked as a region rather than delegate this to a regional body.
Not a good idea	Unlikely to receive national support.
OK idea	This option would likely improve industry acceptability in terms of aggregating data at a regional level, moving towards mitigating commercial sensitivity issues. It would also be more palatable to industry for regional licensing. However, with no mandated role under the Waste Minimisation Act and a dwindling proactive role in waste minimisation generally, there is low likelihood that regional councils would be willing to take on this role.
Bad idea	Not consistent .
Not a good idea	Should note the resourcing implications of this for TAs, both in terms of implementation and ongoing enforcement of the bylaws. Also the lack of resourcing and expertise in solid waste management at many regional councils. This mentions 'benchmarking' and 'sharing' but unclear how this would work in practice (e.g. would it be shared among councils only, or further afield to central government)
Not a good idea	Regional council have no operational or contractual knowledge of TA's solid waste operations.
OK idea	Costly but may work due to there not being a huge number of waste operators in existence

Appendix 50 – Rate “TAs delegate to independent Data Collection Agent” in terms of how much you would like to see this option taken forward.

TAs use solid waste bylaws to introduce waste operator licensing that requires the provision of waste data as part of the license conditions, and delegate the licensing and data gathering function to an independent 'Data Collection Agent'	
Response	Comments
OK idea	I think this would only work well if the 'Data Collection Agent' was the same for each council in NZ.
OK idea	Similar to option 3, this would require TAs to be prepared to implement bylaws. The concept of using a single, national data collection agent would be beneficial for both accuracy and industry engagement. ----- prefers this option over option 3; however, it still leaves uncertainty in terms of political willingness to implement bylaws.
Bad idea	Waste operators should not be required to pay for the dubious pleasure of providing commercially sensitive information that they already own.
Not a good idea	Risk that the third party may charge to make data available to non-users of the service, such as central government.
OK idea	ok if the TA wishes to implement a bylaw. Our current system of utilising contracts and establishing a good relationship with the contractor. There are not many waste operators in our area

Appendix 51 – Email feedback

Three emails were received in response to the online survey. These emails are reproduced in their entirety in the following table. Some details have been removed to maintain the confidentiality of the respondents.

<p>Email response 1</p>	<p>Thank you for the opportunity to comment on the draft definitions and protocols for the National Waste Data Framework. I am confident that the framework that is being developed will lead to much improved data about the management of solid waste as we move towards the next iteration of our WMMP's.</p> <p>I note and support the requirement for waste to be subdivided into a number of categories for reporting purposes. The categories include Domestic kerbside, residential, ICI, landscape, C&D, special, and VEMM waste. Waste collectors and transfer stations will need to report the various quantities of waste under each of the categories above.</p> <p>The issue that I have is that the “residential collection” made by private wheelie bin companies will often comprise mixed waste – some of which falls under the residential category, but there will be a quantity of green waste in it which could, if properly separated, be considered as landscaping waste that could be diverted from landfill. Many of the wheelie bin companies offer a mixed waste service as well as green waste collections. Some consumers simply choose the omnibus bins which allow them to place anything (other than hazardous waste) inside the bin for collection. Thus there will inevitably be quantity of green waste that is included in bins collected from these types of customers. However, it will be impossible to determine the relative extents of residential vs landscaping waste when it is mixed at source in such a manner. A similar situation would arise with a person hauling a trailer to the transfer station – with some general waste mixed with landscaping waste that is difficult to separate.</p> <p>Recognising that there will inevitably be some landscaping waste in the residential figures I think the definition of residential waste should be altered to explicitly state that it may include domestic green waste when it is mixed with other general domestic waste and cannot be easily separated.</p> <p>Thanks again for the opportunity to comment.</p>
<p>Email response 2</p>	<p>Background</p> <p>The purpose of this project is to establish a national framework for waste data to gather good quality, consistent waste data.</p> <p>Specifically, the project will</p> <ul style="list-style-type: none"> <input type="checkbox"/> establish data needs <input type="checkbox"/> develop draft definitions, protocols and roles <input type="checkbox"/> consult on draft <input type="checkbox"/> finalise definitions, protocols and roles and develop implementation plan <p>Current status</p> <p>----- Council collects a significant amount of data via the council-owned weighbridge and in-house software system. However, this data does not completely match the proposed framework protocols in terms of information collected.</p> <p>----- has a licensing system in place and collects some estimated data of waste tonnes. No correlation of this data is done, as all data used for reporting is drawn from the weighbridge data.</p> <p>Support</p> <p>----- supports the aim of this project in principle, while noting that the implementation will be a cost to Council in terms of software development for recording data, the management of the data reporting by staff, increased inputting of data from non-weighbridge sites, and increased administration through our existing registration system.</p> <p>Recommendations</p> <p>---- attended the workshop in ----- and found this very helpful. In reading the document, the protocols appear very rigorous, but it is worth noting that at the workshop it was stressed that a degree of flexibility certainly can be applied and that “near enough is good enough”. This flexibility needs to be conveyed somehow in the presentation of the protocols.</p>

	<p>Some examples are given below.</p> <p>Example 1: Transfer Station definition (page 7)</p> <p>The protocol's definition of transfer stations excludes a transfer station if it is co-located with a disposal facility. This does not fit our current model of data collection, which keeps ----- data with the other transfer stations. The workshop highlighted that this current practice would be acceptable. Ultimately, as long as all data added together gives the gross tonnage, then flexibility is possible.</p> <p>Example 2: Kerbside collection (page 8-A3)</p> <p>It is likely that Council, in terms of being the supplier of the kerbside collection, should be considered a waste collector, and provide data as such. This means providing the activity source data would be relatively easy.</p> <p>Weighbridge practicalities</p> <p>----- telephoned Bruce and had a lengthy discussion around the project, in particular the practical mechanisms around implementing data collection at the weighbridges. While the rural transfer stations in the ----- District have only a limited number of 20-30 codes in use, the ----- weighbridge operators must be familiar with a much larger number, potentially 150-200. Adding codes to this would require some thought so as not to overburden the weighbridge operators. However, it does appear that if the majority of information required can be coded by default, this includes coding activity sources by default based on the customers' business category. In this way, the activity source can be coded for perhaps 90-95% of transactions - near enough is good enough. Some activity sources may be categorized by code. This leaves >5% to be recorded by the operator by questioning the customer. This may be practical at lower-use sites, but is unlikely to be able to be managed at ----- due to the volumes of traffic.</p> <p>To complete the step in the reporting which requires activity sources to be multiplied by composition, ----- recommends that composition for activity sources be provided as a default based on known SWAP data. ----- could then conduct a SWAP at a later date, and compare their own composition data against the default.</p> <p>Software</p> <p>----- is working with ----- to implement new software, and the data changes required under the national waste data framework will be considered.</p> <p>Recovery of costs for increased administration</p> <p>----- waste registration fees are just ----- for a 2-year period. Reporting requirements are minimal and would need to be amended to collect the data as per the protocols. Recovery of costs and reporting systems would need to be carefully considered so as not to disadvantage smaller customers either financially or administratively.</p> <p>Definitions</p> <p>VENM is described as clay, soil and rock free of contaminants.</p> <p>How will concrete, rubble and excavated asphalt be categorized?</p>
<p>Email response 3</p>	<p>My thoughts are as follows - (note also, that review of the consultation documents raised questions as well as comments):</p> <p>Implementation Pathways;</p> <p>Option 1: 'TAs primarily responsible for implementing the framework' –</p> <p>Just thought the above and description summary were misleading and at odds; 'implementing' could be taken to mean TAs are also responsible for driving and funding stages 2 and 3 of the framework, whereas, to 'voluntarily use' is just that. Understanding what I think is the intent though, 'to voluntarily use', I totally agree that under this option, the framework may be implemented by TAs to varying degrees and would go so far as saying that this is what would be likely.</p> <p>Option 2: A 'data working group' –</p> <p>Wouldn't we need this anyway as an additional on-going component of the framework to assist with data issues and be a source of guidance, not just as a standalone option? A third party data collection company would serve to be just that, a data collection company and not play a promotional role or actively coordinate other activities like applying for funding for the other two stages.</p> <p>Option 3: Believe this is what we have now largely.</p> <p>Wonder that if TAs do not have a 'suitable' bylaw and licensing regime, who would follow up on that? Who would sign off on whether a bylaw was suitable? Just looking at a couple of existing bylaws considered to be good examples, both are different in their provision and use of definitions. This also relates to the first point under the PROS; 'would help ensure more consistent regular data' - only if the licensing provision of bylaws of different TAs were somewhat aligned. The strength of this also, will only be as good as the level of consistency that is used by councils in their licensing regime</p>

implementation.

Just regards the last point under the CONS re commercial operators - this can't help but raise the question as to how effective/powerful a bylaw is if the commercial sector may still choose not to provide data if they so wish?

Option 4: TAs mandate regional councils to establish regionally consistent bylaws -

So does this mean they would also be responsible for establishing all other components of a solid waste bylaw and does this also include responsibility for the monitoring and regulation/enforcement components?

Some councils may wish to retain control over their bylaw so as to have complete influence over its scope so they can be responsible for its impact and effectiveness. I anticipate this may be the case for ----- whose desire it is to lead regionally regarding licensing provisions, be smart in everything it does and become the ----th largest economy. This isn't a bad way to go though, but the first point under the CONS; 'all regional council's would have to actively engage for it to be significant' is an example of where it's a real problem there isn't legislation leading this.

Option 5: Delegation of the licensing and data gathering function to an independent data collection agency -

Would this include the enforcement/monitoring etc.? This would require that a bylaw is adequate and sufficient and this may not be the case for some councils. The first point under the PROS; this type of model is in use already and there are existing service providers - where/who? I think without a centrally standardised IT system, you will just have what you have now which is constrained and un-comparable (if that's a word-don't think it is) I like this option as it has the potential to deliver the most effective approach to the capture and management of data which is (so I'm lead to believe), what the waste sector (specifically the TAs) want isn't it? i.e. if we're going to do this and have this money/time/energy spent on doing this, isn't it worth getting it right? This approach I think would help facilitate the most cooperation from the private sector as well as it would be able to convey the most confidence in the management of commercially sensitive data. Where TAs manage the data, there will always be the risk this would be done to varying degrees and to different standards and one incident would have the potential to jeopardise the whole framework and on-going cooperation of the private sector. A solid centrally managed approach would increase the integrity of the framework.

The Protocols:

They do initially seem daunting, hard going and a lot of hard work - I think a lot of councils may also feel this and could be put off I think there could be quite a bit a work initially in some cases to get a good system established and this may also be off putting to councils, knowing where to start or feeling they have the resources to do this - take for example, councils where only one person might be in a waste role (I'm not raising this to reflect my position at all, as I have the confidence to know that through the current solid waste bylaw project for council, ---- will hopefully have something at the end which will be 'suitable' for implementing the framework and collecting the data that is required, taking the direct burden off me - also potentially consulting with the industry/private sector over this). I think the consultation document provides the technical information, but to facilitate uptake, especially by those with limited resources it will need to be presented to users in a clear, basic, easy to read, step by step, engaging way, with nothing assumed in the way of understanding otherwise, even if included in updated MfE guidance for WMMPs and WAs, TAs may not take it on board. I understand why you have started with these protocols though, developed only a certain list of definitions, and not yet developed indicators and the justification for this makes absolute sense. I think to be effective into the future, a data working group or similar should develop indicators so as to further strengthen national data and its uses which could facilitate the setting of national targets ultimately. A data working group could also be the ones to develop further definitions. Under 'which protocol to use' - the principle that should be applied is to use the highest level solution practical - would this not have the potential to lead to inherent differences in data collected leading to constraints with benchmarking and comparisons? I agree with the 'preferred solution' in all cases as absolutely think that in order to get the best quality data, you need to get it from the point of source so as to be the most accurate and representative - anything less than this is just, well, less.

Protocol A Transfer Station:

A4. Splitting tonnages for general users into activity source - would 'domestic kerbside' as a category apply to general users? Under the acceptable solution - how reliable/realistic could it be to rely on weighbridge attendants to conduct activity source surveys at least twice a year? Also, the same question for A6; geographic source as recorded by weighbridge operators? A7; think more

explanation is needed regarding why in the sample form it is requesting an 'estimate' of tonnage of general user waste

Protocol B: Disposal facilities

B2; Total tonnage of diverted material split by activity source - is this diverted material that the disposal facility has recovered themselves or has been dropped off by others?

B7; am I right to think then that ----- outside of our jurisdiction will provide potentially monthly data returns to ---- as our waste is disposed there? The table used here - again, not too clear as to why the quantity in from general users uses estimates - may need another re-read.

It wasn't immediately clear (and took several re-reads to understand, if indeed I now have it right) that the waste collectors and general user information to be reported by disposal facilities is not the same as that already reported by the transfer stations from which they are receiving materials - I have eventually understood this to mean that disposal operators are to record information re general users and waste collectors coming to their site in addition to those that have come through the transfer stations - is this correct?

Protocol C: Waste Collectors

C5; so does the waste collector report to ----- both where the waste is collected AND where it is disposed or is it just where it's collected and only ----- learns of its disposal as ----- is up that way?

Protocol D: Territorial Authorities

D5 aggregating data; step 2 - what if there is only 1 disposal facility?

Step 3 - shouldn't this read, 'data from waste collectors' not disposal facilities?

D7 & D8 - difficult to get your head around

D9 - Having a third party manage the data would address the concerns of the private sector to the greatest extent I believe and help benefit those councils with limited resources; and maintain consistency; ensure the activity is carried out and be objective and unbiased.

Data integrity and commercial confidentiality - this seems like a bit of a chicken and an egg scenario in that it says, it is beyond the scope of this draft protocol to prescribe specific measures for data gathering etc. and yet without the industry and private sector buy in nationally, the framework is not going to stand up - it feels like this aspect should be dealt with first especially if the point is for us all to be recovering and recording data in the same way.

Protocol E:

E2; how would this work for education/communication services?

Protocol F:

Initially this definition of facilities is confusing when the ANZIC codes both refer to services

Definitions:

Am happy with all definitions except for the litter one; 'being of a small enough size that it is plausible that its improper disposal was unintentional' - does this not undermine enforcement of the act of littering?