

WasteMINZ Disposal to Land Sector Group, Territorial Authorities' Officers Forum, and Disaster Waste Working Group submission on the Strengthening New Zealand's emergency management legislation consultation

20 May 2025

This submission represents the views of the Disposal to Land and Territorial Authorities' Officers Forum Sector Groups and the Disaster Waste Working Group and not necessarily those of WasteMINZ. Sector and working groups have been established by WasteMINZ to ensure special interests in the waste, resource recovery, and contaminated land management sectors are adequately represented.

WasteMINZ is the largest representative body of Aotearoa New Zealand's waste, resource recovery and contaminated land management sectors. We are the authoritative voice on waste, resource recovery and contaminated land management in New Zealand, with 430 member organisations from small and large waste operators, materials recovery facilities, territorial authorities, community groups, researchers, food rescue groups, major supermarkets, tech companies, packaging producers, contaminated land specialists, consultants, and many others looking to make a difference to the environment.

About the Disposal to Land Sector Group

The Disposal to Land Sector Group was established to promote a consistent and good practice approach to the management of waste disposal to land and represents over 800 members, technical and operational experts engaged within disposal of waste to land activities across Aotearoa New Zealand. The Disposal to Land Sector Group Steering Committee is elected to represent the common interests of the sector.

About the Territorial Authorities' Officers Forum

Creating consistency and efficiency of service amongst territorial authorities through sharing knowledge and best practice around waste, recycling and resource recovery.

The Disposal to Land Sector Group, Territorial Authorities' Officers Forum Sector Group, and the Disaster Waste Working Group welcome the opportunity to submit on the strengthening of New Zealand's emergency management legislation. The sector groups have been advocating for change following the flooding in the upper North Island and Cyclones Gabrielle and Hale, recognise the need for local authorities and communities to have additional assistance, and support government's efforts to provide flexibility to facilitate, enable, and expedite recovery efforts.

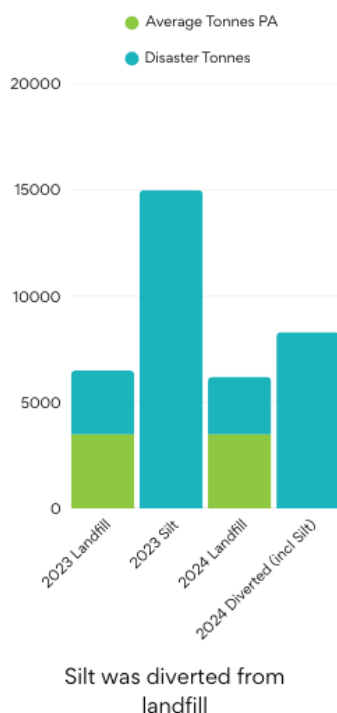
WasteMINZ's Disaster Waste Working Group aims to support territorial authorities in their planning for and response to waste from disaster and emergency events. The following infographic details the scale of waste after recent disasters:

Disaster Waste in New Zealand

KEY STATISTICS

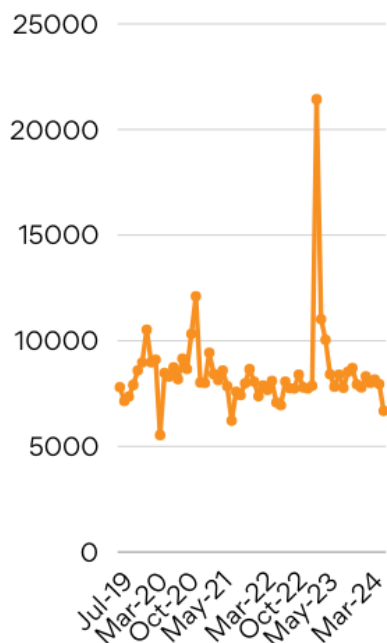
Wairoa District Council

Wairoa District Council waste associated with Cyclone Gabrielle



Ōmarunui Landfill

Monthly tonnages going to Ōmarunui Landfill, Hawkes Bay. Note Peak after Cyclone Gabrielle



Auckland Anniversary Flood & Cyclone Gabrielle Response Phase



> 680 skips and > 250 Flexi-Bins on rotation



> 15,000 visits to transfer stations



10 contractors, > 300 staff & volunteers, cleared 100s of streets

Auckland Anniversary Flood & Cyclone Gabrielle Response Phase

15 Transfer stations received Flood Damaged items > 6200 tonnes



The consultation draft discussion document covers a wide range of emergency management powers and considerations. This submission will primarily focus on:

- **Designation of waste management as essential infrastructure:** This submission supports the proposal for waste collection, treatment and disposal services to be either added to the schedule of lifeline utilities or designated as essential infrastructure in amended legislation.
- **Support for territorial authorities to minimise waste to landfill from disaster disposal:** Emergencies result in large volumes of waste, and historically much of this waste has ended up in landfill. We seek central government prioritisation of minimising waste to landfill by supporting and funding TAs for local pre-event planning, resourcing, training, and civil defence exercises, support for better regional collaboration and creation of intra-regional plans, and support in the response phase to enact diversion activities. We also support requirements for businesses to manage their waste in an emergency
- **Development of expert group to support disaster waste response:** Individual councils are unable to maintain capacity, capability, and specialist knowledge

to support waste management challenges post an emergency event. Having an expert group that can support local government in the aftermath of an emergency can ensure best practice is followed, waste to landfill is minimised and recovery can be expedited.

Designation of waste management as essential infrastructure

Issue 11 - Minimising disruption to essential services

Issue 11.1: Narrow definition of “lifeline utility”

1. Do you agree with how we have described this problem?

Yes

2. Do you have any comments about the likely impacts (benefits, costs, or risks) of the initial options we have identified? Do you have any preferred options?

3. If we introduced a principles-based definition of “essential infrastructure”, are there any essential services that should be included or excluded from the list in Appendix C of the discussion document?

Yes – Inclusion of waste management

Please explain your views

The waste sector is critical in New Zealand’s response to emergency

WasteMINZ members operate key infrastructure that is a core part of everyday life in New Zealand. The waste sector operates seamlessly for most parts of the country, with the collection of waste so ubiquitous, that Kiwis are unaware of the scale of waste that is managed under normal conditions. It is only when these services are interrupted that we are confronted with the impacts.

This infrastructure is key for public health, environmental protection, and economic functioning across the country. In an emergency response, the ability of waste operators and local government to collect, treat, sort, and dispose of waste is critically important in the prevention of disease outbreaks and environmental contamination. This goes for both regular waste and the waste generated from the emergency.

Kiwis like to get stuck in quickly and clean up after an emergency – coordinated, planned and prompt collection of waste is necessary in the response phase to support sanitary conditions and diversion of this waste from landfill where appropriate. This waste can quickly amass post-event and alongside creating public health hazards, can also hinder recovery efforts.

The consultation’s discussion document details that essential services address basic needs, keep us safe, and let us live our normal lives, and that we are often unaware of how much we rely on these services until something goes wrong (*Discussion Document - Page 53*). As already outlined, the waste sector fulfills these criteria through supporting public health outcomes and protects water quality by managing potentially

contaminating materials. Waste management also enables businesses and homes to continue to function through regular waste collection, something that is critically important for healthcare and food outlets (e.g. supermarkets), as well as supporting the move to recovery by managing debris and disaster waste.

Managing waste is already an around the clock job, and the waste sector (including but not limited to waste operators, waste professionals within territorial authorities, recyclers and resource recovery centres) is ready to respond in emergency scenarios, and this has been demonstrated nationwide. However, the ability for the waste sector to work with broader emergency response structures, is currently limited without the recognition as a lifeline utility/essential infrastructure.

Due to waste not being recognised as essential infrastructure:

- Waste is not automatically integrated into emergency planning processes
- Access to restricted areas during emergencies is not guaranteed
- Prioritisation of resources (fuel, access, personnel) is not formalised
- Coordination between waste services and other essential services lacks clear protocols.

These challenges increase the likelihood of service disruption during the periods when waste management is most critical.

This recognition would also support all issues relating to waste being better considered at the pre-event planning stage, not only with planning itself, but by waste representatives being involved in drills and preparation exercises.

WasteMINZ represents 66 of the 67 territorial authorities in New Zealand, many of which have faced head on the challenges from Auckland Anniversary flooding, Cyclone Gabrielle, Cyclone Hale, the Christchurch Earthquake, and localised flooding events across both the North and South Islands. Waste often is a large part of the response effort, and all territorial authorities are aware of how huge the job is to address these issues and are constantly increasing their preparedness.

Across the wider sector, waste infrastructure is owned and managed by a variety of different organisations. However, led by local government waste representatives, these organisations can provide a coordinated resilient response in an emergency scenario.

The sector groups recognise that being designated as essential infrastructure/lifeline utility comes with responsibilities, however, believe that the designation is necessary to better integrate the waste sector into emergency readiness and response.

4. If you think other essential services should be included in the list in Appendix C, what kinds of infrastructure would they cover?

5. Are there any other options that should be considered?

Issue 8 - Stronger national direction and assurance

Issue 8.1: Strengthening the Director's mandate to set expectations and monitor performance

1. Do you agree with how we have described this problem?

2. Do you have any comments about the likely impacts (benefits, costs, or risks) of the initial options we have identified? Do you have any preferred options?

3. Which aspects of emergency management would benefit from greater national consistency or direction?

Support for territorial authorities to minimise waste to landfill from disaster disposal

Management of waste after a disaster is a lengthy process, although some items such as household's organic waste may be dealt with in the initial response phase, dealing with large amounts of silt and deconstruction of buildings can take months or years. The huge scale of waste cannot be understated; the Canterbury earthquake is estimated to have generated 8 million tonnes of waste.

Territorial authorities need central government direction, support and funding to deliver regional and local disaster waste management plans that prioritise diversion of waste from landfill. This can be achieved through pre-event planning and regional collaboration. There is currently a lack of guidance, information and best practice in this space to support territorial authorities in this planning, and greater national direction and support would be beneficial.

4. Are there any other options that should be considered?