

WasteMINZ' TAO Forum was established to create consistency and efficiency of service amongst territorial authorities through sharing knowledge and best practice around waste, recycling and resource recovery.

The TAO Forum's submission is informed by the waste hierarchy and circular economy principles, and supports the embedding of mātauranga Māori in the waste sector. Therefore, the following submission prioritises solutions that reflect these principles and takes a holistic, interconnected view.

Necessary action 13 Reduce emissions from waste

We recommend that, in the first budget period the Government take steps to support the reduction of waste at source, increase the circularity of resources in Aotearoa and reduce waste emissions by:

- a. Setting ambitious targets in the New Zealand Waste Strategy for waste reduction, resource recovery and landfill gas capture to reduce waste emissions in Aotearoa by at least 15% by 2035.**
- b. Investing the waste levy revenue in reducing waste emissions through resource recovery, promotion of reuse and recycling, and research and development on waste reduction.**
- c. Measuring and increasing the circularity of the economy by 2025.**
- d. Extending product stewardship schemes to a wider range of products, prioritising products with high emissions potential.**
- e. Legislating for and funding coordinated data collection across the waste industry before 31 December 2022.**

Targets

More ambitious targets need to be set now to allow for scaled and staged investment in waste minimisation infrastructure, product stewardship schemes and the associated policy changes or we will not transition to a circular economy and net-zero emission goals by 2050.

The Commission's 23% reduction target for organic waste to landfill by 2030 needs to aim higher and include targets for all organic materials including: garden organics, food, vegetation, timber, textiles, biosolids, sludge and fibre. Staged targets should then lead to a total ban on all organic waste to landfill. Analysis of landfill bans have shown benefits to include: job creation, growth of the organics industry, reduction in waste cartage (and associated fuel emissions) and increase in food rescue initiatives¹. A phased approach supported by product stewardship schemes would allow for the necessary changes to systems and support investment planning. Many organic waste streams will require alternative treatment processes not currently operating or accessible in NZ, e.g. treated timber, tannery waste and putrescible wastes from the meat processing industry.

A consumption-based approach should play a key role in setting our emissions budgets and measuring progress. Consumption-based emissions data follows emissions through the lifecycle of products and materials, exposing both embodied emissions generated offshore and the upstream emissions cost of short-lived consumer goods.

¹ (https://www.chlpi.org/wp-content/uploads/2013/12/Organic-Waste-Bans_FINAL-compressed.pdf) .

Recommendations:

The TAO Forum agrees with the CCC recommendation to set ambitious targets in the Aotearoa New Zealand Waste Strategy for waste reduction and landfill gas capture to reduce waste emissions in Aotearoa.

The TAO Forum also recommends high targets be set for all organic material going to landfill by material stream and the signalling of future landfill bans for this material.

The TAO Forum also recommends further consideration of taking a consumption based approach to reduce the emissions associated with the production of consumer goods.

Landfill Gas Capture

The TAO Forum is concerned that investment in landfill gas capture to energy could have unintended consequences including an increase in organic material to landfill. The TAO Forum recognises that parts of the waste sector will advocate for improved capture of methane from landfills to be used for energy. Disposal of resources to landfill is a depletion of earth's resources and is not a renewable activity. The TAO Forum believes the expansion and investment into landfill gas capture (to energy) could have the unintended consequence of incentivising an increase of organics to landfill (gas capture of legacy material being the exception). To better align with circular principles, the reuse of organics must be focused on soil regeneration, local food production and food security, not for production of energy. Therefore, the TAO Forum supports landfill gas capture for legacy material only.

In conjunction with any landfill ban of organic materials, work is needed to ensure there are markets for increased compost, biochar and soil conditioners produced by diversion, and investment made in beneficial reuse of organic material facilities, as well as support for local councils in implementing the right system for their region.

Alongside investment in organics reuse, work is required to ensure end-markets for increases in compost material, biochar and soil conditioners produced by diversion from landfill. Coordination and support for Territorial Authorities (TA's), other stakeholders and funding partners is required to ensure the right systems are in place and the best approach is taken for each region.

Recommendations:

The TAO Forum recommends the reuse of organics be focused on outcomes associated with soil regeneration, carbon sequestration, local food production and food security and not be sent to landfill to produce an energy source, unless it is for the management of legacy waste.

The TAO Forum recommends that landfill gas capture and reuse not be considered as a renewable energy source. Policy and systems will need to be in place so landfill gas capture is not used as a loophole to permit organic waste disposal to landfill. Policy/systems will need to be in place to ensure LGC is not used as a loophole to permit organic waste disposal to landfill.

Food Waste

The Commission's waste reduction target for organic waste to landfill of 23% by 2030 needs to aim higher to get national action on diverting food waste. An analysis² of organic materials landfills bans in Massachusetts and New York found that the bans had benefits including job creation, growth of the organics industry, reduction in landfill hauling and tipping costs, and *reductions in harmful gas emissions*. New York's cost-benefit analysis identified reduction in greenhouse gas emissions as one of the largest societal benefits stemming from the proposed organic waste ban.

In addition, landfill bans of organic materials can benefit food rescue organisations³. A landfill ban for organic materials could take a phased approach with edible food waste and greenwaste banned first, followed by textiles and then moving onto other organic items such as fibre, biosolids, sludges, wood and furniture as sustainable solutions are found for processing these materials and or they are declared priority products.

Recommendations:

The TAO Forum recommends increased central government investment in reducing food waste along all parts of the food chain.

The TAO Forum recommends mandated separation of organic materials (dependent on analysis of regional context and suitable options) and a phased ban on organic waste to landfill.

The TAO Forum recommends the NZ Government adopts the UN's Sustainable Development Goal 12.3 on food waste reduction with the aim of halving food waste by 2030.

Investing the Waste Levy

The most effective way to reduce emissions from production, consumption and waste is to invest the waste disposal levy revenue in systems (including data collection, education and behaviour change initiatives) and infrastructure that target the top of the waste hierarchy in order to prevent and reduce the creation of waste in the first place and grow the reuse economy.

The TAO Forum supports the CCC's recommendation that the government develop an equitable transition strategy and asks for the strategy to include community social enterprises. This will ensure a just transition with investment in local, community scale solutions and SME innovators who are driving change as well as investing the expansion of existing waste reduction programmes to tautoko (support) the fantastic work of the existing programmes. One of the current barriers to rolling out the existing programmes on a national scale is a lack of resources and reliance on funding that is for a specific (and often short) time period.

Community based, social infrastructure such as resource recovery networks, repair hubs, learning centres, swap shops, community composting etc are further up the waste hierarchy and have suffered from under investment for many years. They must not continue to be left up to volunteers and annual funding applications to be able to thrive. They need greater financial certainty over multiple years. Waste minimisation community infrastructure is where our community members go to share, inspire and learn new behaviours fit for a zero emissions and circular economy future. A large portion of waste is generated and managed by the private sector outside of Councils' influence including construction waste landfills and greenwaste

² (https://www.chlpi.org/wp-content/uploads/2013/12/Organic-Waste-Bans_FINAL-compressed.pdf) .

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landfills. Infrastructure for resource recovery, composting, recycling processing or construction waste diversion, for example, requires a staged approach so that funding partners can commit to the 15-20-year lifecycles that informs and is aligned with the MfE's Waste Investment Plan.

Recommendations:

The TAO Forum agrees with the CCC recommendation to invest the waste levy revenue in reducing waste emissions through resource recovery, promotion of reuse and recycling, and research and develop on waste reduction. In addition, the TAO Forum recommends that infrastructural investments take into account scalability, adaptability to change and prioritise in order of the waste hierarchy and emissions reduction potential.

Circular Economy

It is important to recognise the indigenous worldview of Aotearoa that have parallels with but is distinct from the Circular Economy model. This will provide a more holistic approach to waste in Aotearoa which also recognises the interconnectedness of social justice issues with waste. Once this model is embedded in legislation a shift to a circular economy will be enabled.

The shift to a circular economy cannot be the responsibility of the waste sector alone but must also be embedded in legislation such as the Resource Management Act. This will help ensure for example; low emission and low waste construction and deconstruction, multi-dwelling housing design has improved waste minimisation opportunities such as single stream collection, and could enable communities to access for example de-centralised, shared urban composting opportunities. Actions to reduce waste across all sectors presents an opportunity to create new norms for the whole of Aotearoa.

Recommendations:

The TAO Forum advocates for a panel of Māori experts to be established by the government to drive a circular model for Aotearoa and embed this model in all aspects of the sector.

The TAO Forum recommends that circular economy opportunities are integrated across other key legislation and strategies such as the RMA, the forthcoming Strategic Planning Act and Natural & Building Environment Act, and the Infrastructure Commission's forthcoming Infrastructure Strategy.

Product Stewardship

Reducing waste presents opportunities to reduce the embodied energy of products across all sectors. Reducing the emissions produced during manufacture are far greater than focusing on reducing emissions from resultant landfill waste after the product has been used and thrown away.

Regulated product stewardship schemes (as per MfE priority product regulated product stewardship guidelines) need to be designed to focus on the top of the waste hierarchy to create reuse and resource recovery systems that keep materials in circulation and maintain their value for as long as possible.

Products that cannot be effectively recovered, recycled or composted need to be designed out of the economy. The ban on single-use plastic bags is a successful example of how this can be done.

Phasing out single use disposable products needs to be a priority and work has begun on this already with last year's consultation on phasing out hard to recycle plastics. More work on this is to follow (including the co-design of a product stewardship scheme for the priority product of plastic packaging). Measures that mandate right to repair for electronic products should also be investigated as part of the review of the Waste Minimisation Act and the National Waste Strategy.

Recommendations:

The TAO Forum agrees with the CCC recommendation to extend product stewardship schemes to a wider range of products, prioritising products with high emissions potential.

The TAO Forum recommends the following products be consider as priority products textiles, timber (all forms), fibre (paper and cardboard), biosolids and sludge.

The TAO Forum urges faster progression on implementing the current regulated product stewardship schemes that have been co-designed or are in the process of being co-designed.

The TAO Forum strongly supports the development of 'right to repair' legislation.

Data Collection

The CCC draft advice acknowledges the lack of national waste data. Under section 86 of Waste Minimisation Act Territorial Authorities can licence waste operators to collect data. Many TA's are in direct competition with private waste operators, resulting in the private waste operators being reluctant to provide data. In addition, TA's may not have the resource capacity to collect, verify and store data.

It is noted that licensing waste operators does not provide data from farm landfills (which can be a permitted activity).

There is an opportunity for central government to collect data (as they do with Landfill operators for emission management) rather than this as a TA or Regional Council function.

Recommendations:

- The TAO Forum agree with the CCC recommendation to legislate and fund coordinated data collection across the waste industry before 31 December 2022.
- Furthermore the TAO Forum recommends this data collection system is a function of Ministry for the Environment.
- In addition, the TAO Forum recommend the data collection system incorporates farm landfills.

Necessary action 14

Manage the transition from hydrofluorocarbons

Consistent with the Kigali Amendment to the Montreal protocol, we recommend that, in the first budget period the Government supports reducing emissions of hydrofluorocarbons (HFCs) used as refrigerants by:

- a. **Extending HFC import restrictions, where feasible, to include finished products and recycled bulk HFCs by 2025.**

b. Reducing leakage and improper disposal of HFCs through mandating good practice from business and technicians.

The TAO Forum supports the safe collection and disposal of HFCs in imported finished products through a coordinated product stewardship scheme approach. The TAO Forum suggests setting a timeline to ban imports where alternatives are not adopted.

Recommendations:

The TAO Forum recommends the regulated product stewardship scheme for refrigerants and other synthetic greenhouse gasses be urgently implemented and extended to ensure correct disposal occurs across all areas.

The TAO Forum recommends the product stewardship scheme approach to expand to 'legacy' HFCs in existing equipment.

Necessary action 16

Support behaviour change

We recommend that, in the first budget period the Government embed behaviour change as a desired outcome in its climate change policies and programmes in order to enable New Zealanders to make choices that support low emissions outcomes.

Behaviour Change

The TAO Forum advocates support for existing behaviour change education programmes such as Para Kore, Enviroschools and national behavioural campaigns such as Love Food Hate Waste and Plastic Free July be extended and fully government funded.

The TAO Forum believes there is the need to ensure opportunities to limit waste and emissions are embedded into tertiary and vocational education paths such as existing engineering and construction programmes and through the creation of new 'repair economy' career pathways through apprenticeships.

The TAO Forum believes there is the need for easier access to resources so that businesses, NGO's, communities and individuals can better understand their emissions profile and make changes accordingly. If individuals and the wider community are not fully aware of their environmental (and emissions impacts) they may be unwilling to change their behaviour.

In addition, more progress could be made if a standalone government organisation was established similar to WRAP in the UK, that enables a transition to an indigenous Aotearoa circular model that is not subject to political cycles and changes in government priorities.

Recommendations:

The TAO Forum recommends investment in existing community-based organisations such as the Zero Waste Network and Para Kore to expand the resource recovery network and national behavioural change programmes that support the move towards zero emissions and circular economy communities.

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