

Balancing Up the Responsibility

BOOT based product stewardship

Oct 2011



Oil Recycling
Engine Oil Recovery

Introduction

- The role of council in product stewardship?
- What is a BOOT based product stewardship approach?
- Key considerations:
 - Independent
scheme manager
 - Customer representation
 - Monitoring and reporting
 - Communications
 - Resourcing
 - Hand over

Setting the scene

- Used oil problem in Auckland

Auckland householders produce an estimated 656,000 litres of used oil annually but only a third of that is believed to be disposed of safely, meaning the balance is potentially ending up harming the environment.

- Disposal causes contamination in streams, waterways and soil
- Aggressive contaminant, comparatively harmful to environment

Setting the scene

"Given one litre of used engine oil can contaminate one million litres of water and council surveys indicated the majority of households did not have access to safe convenient disposal services the council decided it was important to initiate something."

- Identified as potential draft priority product
- Hazmobile survey identified community demand

Used Oil Pilot Scheme

- Developed over last 3 years, operational in Feb
- 10 industry partners, MfE, Auckland Council
- Initial results promising, NZ wide long term

In the first **3 months**,
we have collected
69,183 litres of
used oil and recycled
4356kg of **plastic!**

Used oil pilot scheme

- What have we learned?
- Council leadership early
- Need for exit strategy
- Idea of the BOOT approach - testing this today

BUILD, OWN, OPERATE, TRANSFER

What is a BOOT based approach?

- BUILD, OWN, OPERATE, TRANSFER

BUILD

Appoint Scheme
Manager

Determine Scheme
Type

Set Objectives

Scope Resourcing

Develop Exit Strategy

Evaluation Plan



What is a BOOT based approach?

- **BUILD, OWN, OPERATE, TRANSFER**

BUILD

- Appoint scheme manager
- Determine scheme type
- Set objectives
- Scope resourcing
- Develop exit strategy
- Evaluation plan

OWN

- Operational requirements
- Confirm scheme membership
- Communications planning
- Establish monitoring systems
- finalise resourcing

What is a BOOT based approach?

- BUILD, OWN, OPERATE, TRANSFER

BUILD

- Appoint scheme manager
- Determine scheme type
- Set objectives
- Scope resourcing
- Develop exit strategy
- Evaluation plan

OWN

- Operational requirements
- Confirm scheme membership
- Communications planning
- Establish monitoring systems
- finalise resourcing

OPERATE

- **Deliver scheme to customer**
- **Implement communications**
- **Establish monitoring arrangements**
- **Commence scheme hand over**

What is a BOOT based approach?

- BUILD, OWN, OPERATE, TRANSFER

BUILD

- Appoint scheme manager
- Determine scheme type
- Set objectives
- Scope resourcing
- Develop exit strategy
- Evaluation plan

OWN

- Operational requirements
- Confirm scheme membership
- Communications planning
- Establish monitoring systems
- finalise resourcing

OPERATE

- Deliver scheme to customer
- Implement communications
- Establish monitoring arrangements
- Commence scheme hand over

TRANSFER

- Evaluation
- Complete hand over to third party
- Monitoring and reporting (ongoing)
- Communications (ongoing)

Key considerations for a BOOT

- Independent scheme manager
- Public good, skills and expertise
- Monitoring and reporting
- Communications
- Resourcing
- Hand over



Commercial independence

- Key challenge – building trust, anti-competitive concerns
- Council has no *commercial* interest
- Industry has expectations of council involvement in domestic waste
- Council leadership role in – ‘build’ ‘own’ stages

Customer representation

- Hazmobile survey – waste is waste
- Some products very hard to sort
- Industry wide schemes simpler and more convenient for customers
- Council role in representing customer perspective
- ‘build’ & ‘own’ stage

Monitoring and reporting

- Environmental monitoring, legislation, establishing systems
- Transparency when gathering information & managing sensitivities
- Council role critical for used oil



Communications

- Challenging discussions
- Even playing field
- Longevity of the scheme
- Limit brand exposure, brand evident on secondary materials
- Website, posters, funnels



Resourcing

- Expectation that Council will provide resources, funds and people
- Need for early agreements
- Negotiate in 'build' and 'own' stages
- Lock well before scheme goes live

Transfer arrangements

- Long term scheme management
- Transfer process consider:
 - Skills and experience of scheme manager
 - Ability of scheme to be self funding, profitable
 - Customer support for scheme
- Hand over starts in 'operate' stage
- Council to consider whether will 'prop' up scheme if it fails

Conclusions

- Importance of independent third party
- Public good, monitoring and reporting

I just came across this oil recycling scheme, and want to say how great it is. You have just earned yourselves a new customer, as I am glad that a motor industry company is doing its bit for the environment ... Well done, and please keep up the good work." (Catherine – via Used oil website)

Conclusions

- Exit strategy, hand over arrangements determined early
- Resourcing clear and agreed
- Even playing field for communications
- Structured, BOOT process, provides a framework

What is a BOOT based approach?

BUILD

Appoint scheme manager - Determine type of scheme -- Set objectives - Scope Resource Requirements - Develop Exit Strategy – Evaluation Plan

OWN

Determine operational arrangements - Confirm Scheme Membership- Plan Communications - Establish Monitoring Systems - Finalise Resourcing

OPERATE

Deliver scheme to customers - Implement Communications and Monitoring - Commence Scheme Handover Process

TRANSFER

Complete transfer to third party manager - Ongoing monitoring and reporting - Management of operations - Customer service - Communications – Evaluate against Objectives

Questions

Contacts

- For further information about the used oil scheme contact

sandra.murray@aucklandcouncil.govt.nz

- Or visit www.oilrecycling.org.nz

Product Stewardship: Balancing up the responsibility

By Sandra Murray and Caitlin Scott

Introduction

This paper is based on a review of product stewardship undertaken by Auckland Council to assess its potential as a tool to minimise waste to landfill in the Auckland region. Its focus is on the potential to use a different version of a 'BOOT' model (build, own, operate and transfer) for regional product stewardship schemes. The 'BOOT' approach is suggested as a way of balancing responsibility for the whole of life costs associated with products and their packaging between business, councils and the community. It provides a clear and transparent process for businesses to work together as well as a potential facilitating role for territorial authorities (TAs). The paper draws on the experience of the pilot used oil take back product stewardship scheme, currently operating in Auckland. The Auckland Council wishes to acknowledge the business partners and the support of the Ministry for the Environment in this pilot project.

Background

Increasing population and the availability of cheap consumer goods with shorter life spans means that product waste is a growing and costly problem for Auckland Council and its ratepayers. At present the environmental and financial costs of product and packaging waste are largely met by the wider community, particularly when collection and disposal services are funded by rates.

Product stewardship, sometimes referred to as Extended Producer Responsibility (EPR), is a policy approach that aims to encourage producers and consumers to take greater responsibility for the social and environmental costs of products and packaging¹. Left to its own devices, the market does not always take costs such as pollution, collection of waste, loss of landfill space and reduced resource availability into account.

Product stewardship schemes are one of the mechanisms being used by Auckland Council to meet its obligations under the Waste Minimisation Act 2008 and to work towards its aspirational goal of zero waste. The schemes provide an opportunity for producers and consumers to take responsibility for product waste and packaging, as well as articulating a potential role for councils. One of the key issues for such schemes is determining the balance of responsibilities between parties in design, operation and ongoing scheme management. The 'BOOT' approach is proposed to address this, making the stages of scheme development clear, as well as identifying the point at which management of the scheme is handed over from council to a third party.

Over the last three years, Council has worked closely with the business sector and the Ministry for Environment to develop a take back scheme for used oil. The scheme is proving to be successful in facilitating business competitors to cooperate around waste and in encouraging householders to responsibly dispose of their used oil.

¹ The terms Extended Producer Responsibility (EPR) and product stewardship have become more or less interchangeable

“We are starting this programme in Auckland because it is the most vulnerable to used oil pollution with its high population and being surrounded by water... This waste minimisation project is an excellent example of councils, government and industry working together to reduce waste and improve the environment. (Environment Minister, Nick Smith, 2011)

Initial reports show that in the first three months of the scheme’s operation, 124,358 litres of used oil was collected along with an unexpected 7,804 kg of plastic container material, which was able to be recycled. It should be noted, that the scheme is still in its early stages, and its long term performance has yet to be assessed. Key partners in the scheme are: Auckland Council, Ministry for Environment, collection agency R.O.S.E. (Recover Oil Save Environment), Castrol, Orica, Total Lubricants, Penrite and Fuchs. The scheme is also supported by the Motor Trade Association. The Ministry for Environment provided \$50,000 from the Waste Management Fund to establish the scheme which is being managed and promoted by the Auckland Council.

Launched in February this year, the scheme took three years to develop with the former regional council playing the lead role in scheme initiation and management. While not initially conceived as a ‘BOOT’ model, the used oil scheme provides some important lessons for the development of this approach. The remainder of this paper will explore these lessons and consider their application to ‘BOOT’ based product stewardship schemes.

What is a ‘BOOT’ based product stewardship scheme?

The acronym BOOT stands for the words ‘build’, ‘own’, ‘operate’ and ‘transfer’, and is most often used in an infrastructure context to describe the delivery model for major projects - roads, railways, a new tunnel or a new landfill. As one of the partnership models pursued by governments in recent times, the approach is commonly for the private sector to build, own and operate a facility, and then hand this over, in the long term, to public ownership. The aim of this approach is to reduce the upfront capital cost to the taxpayer.

But what could the term mean in the context of product stewardship schemes? For ‘BOOT’ schemes in this context the responsibilities are reversed. Here, it is government that facilitates the building, owning and operation of the scheme, but it is a third party to which the responsibility for ongoing management is eventually transferred. The aim of this approach is to reduce the ongoing operational costs to ratepayers and improve waste minimisation outcomes.

Key considerations for a “BOOT” scheme

There are a number of key considerations in the design of a ‘BOOT’ based product stewardship scheme. These include:

- appointment of an independent third party scheme manager,
- determining the type of scheme,
- monitoring and reporting,
- communications, funding and
- resourcing.

These are discussed below, drawing on the initial experiences of the used oil take back scheme.

Council as an independent third party and scheme manager

In 2007, the former council for the Auckland region identified used oil from the domestic market as requiring an ongoing disposal mechanism. At the time, used oil was over 50% of the material collected by the Hazmobile service - the domestic hazardous waste collection in place for the Auckland region. A survey of people using the Hazmobile service identified a considerable demand among home mechanics and others for a dedicated scheme for used oil². Having established the demand for such a scheme, Council undertook two years of negotiation to bring ten partners into a pilot scheme (including Auckland Council and the Ministry for the Environment). The scheme was launched in partnership with industry and the Ministry for Environment in February 2011.

"Given one litre of used engine oil can contaminate one million litres of water and council surveys indicated the majority of households did not have access to safe convenient disposal services, Council decided it was important to initiate something." (John Dragicevich, Auckland Council Manager Infrastructure & Environmental Services, 2011).

One of the key challenges in establishing the scheme was overcoming competitive concerns and encouraging businesses to work together. The Commerce Act 1986 legislates in such a way that some of the initial scheme participants were concerned that co-operating with others in the industry over product stewardship may have been seen as anti-competitive under legislation. For some participants, the very concept of working with businesses against whom they were more used to competing was unfamiliar.

An independent third party, in the position of scheme manager is important while the details of a scheme are being decided and trust between the parties is still developing. Local and regional government are able to fill the role of the third party. Councils are, to some degree, trusted to be independent of competitors, impartial and transparent in operation. Council involvement provides a measure of security to business that the scheme will be supported going forward, given councils' obligations under the Waste Minimisation Act 2008.

Other options for third party scheme management include contractors and specialist product stewardship companies. At times, however, there can be a tension when using private contractors as they are employed by the parties they need to manage. From time to time they need to negotiate differences between party participants, as well as steer the scheme in directions that may be unpopular. Council in the position of scheme manager may find it easier to remain independent from the partners than a private contractor.

Case Study: Used Oil Take Back Scheme

In the case of the used oil take back scheme, industry was reluctant to set up a domestic scheme. The oil industry in New Zealand had a number of commercially focused schemes and felt the domestic market was too small and diffuse to be concerned with. In addition, oil companies were highly resistant to meeting together, citing concerns in relation to the Commerce Act 1986.

² Refer to, Blutner, R (2009) 'Auckland Regional Council Report: Management and disposal of waste oil from domestic sources in the Auckland region – issues and options for local government', Auckland, Weitsicht Ltd

As Council was the main party expressing concern over the issue, and was able to act as an independent third party, it took on the scheme manager role. Council was viewed by business as sufficiently neutral, and its involvement was also reassuring to a number of companies who felt Council should hold primary responsibility for domestic waste.

While Council played a key role in initiating the scheme, developments at a national level also had a bearing. The Ministry for the Environment had just released a discussion paper on priority product stewardship in which used oil had been named as a potential draft priority product.³ In the initial stages, 25 partners were involved in discussions about the scheme. In later discussions, when priority products were no longer under discussion on a national level, participation reduced to the final 10 partners.

Another reason for the appointment of an independent third party as a scheme manager was that the competitive nature of businesses caused some partners to try to find ways to lever off the scheme to gain competitive advantage. While a natural business instinct, this threatened the stability of the scheme at times. Council was required to take a fair and firm approach in these kinds of situations in order to maintain an even playing field for all partners.

Suggesting the adoption of a BOOT type approach goes toward the formalisation of the potential role of councils in managing the scheme throughout the various phases. In the stages of 'building' and 'owning', it is preferable that council take a strong leadership role. Once the scheme is up and running - the 'operate stage' - it makes sense for a handover process to commence to a third party manager, with this being completed in the final 'transfer' step.

Council role in providing skills and expertise to the scheme

Public Good

The establishment and running of a product stewardship scheme requires a different set of resources and skills to running a business and the required consideration of a public good element. Retailers, in particular, may struggle to provide a network of drop off facilities, establish or comply with monitoring or reporting requirements. In addition, the natural tendency of companies is to develop schemes that are cheapest and easiest to run from their perspective. So the approaches proposed by the scheme partners may not be the most cost effective from the ratepayers' perspective or create the greatest public value. Councils have an important role to play in ensuring the processes established by the scheme not only meet the needs of the partners, but also result in the greatest degree of participation by the community.

Monitoring and reporting

³ Refer Ministry for the Environment (2009) *Waste Minimisation in New Zealand – A discussion document from the Ministry for the Environment*. Wellington: Ministry for the Environment. Also, Ministry for Environment (2009) *Used Oil Recovery, Reuse and Disposal in NZ, Issues and Options*. Wellington: Ministry for the Environment.

Another aspect of scheme design that requires particular attention is the establishment of effective monitoring and reporting frameworks. A recent study by a Masters of Planning student of three voluntary product stewardship schemes in New Zealand identified performance in this area as needing improvement. It noted the systemic failure of voluntary product stewardship schemes to provide consistent, reliable data on performance as a particular issue of concern.⁴

Independent third party scheme managers, whether contractors, specialist companies or council, are needed to manage successful product stewardship schemes. They need to have the required degree of independence from partners to the scheme to balance the requirements of the customer with the focus of the business partners. Councils also have the added advantage of being subject to a number of probity requirements. This means that, in the early stages of a product stewardship scheme, Councils are in a good position to oversee the development of systems for the collection of data, particularly where there are commercial sensitivities.

Case Study: Used Oil Take Back Scheme

The used oil take back scheme was based on a drop off system that would comply with regulatory requirements for the safe collection, storage and transport of used oil. Just as important, was the provision of a convenient service that customers would use. The disposal agent partner contributed significantly to the development of the collection approach, while Council advised on the legislative and customer service aspects. Council also consulted with retailers to ensure the collection systems established were practical and customer focused.

Data on the amount of oil collected is gathered by the disposal agent and provided to the scheme manager for analysis and to monitor the success of the scheme. This data is required by partners, including the Ministry for Environment, and is also important from a Council perspective. In establishing the used oil scheme, Council played an important role supporting this process, as the disposal agents' main focus tended to be operational.

In terms of a 'BOOT' approach, councils can have a key role in the establishment and ongoing maintenance of monitoring and reporting on schemes. In addition to scheme managing in the first two stages ('build' and 'own'), government can play a useful role in explaining legislative and reporting requirements as well as establishing systems. Depending on the scheme partners involved, and the sensitivity of the information, councils may remain involved in data gathering and analysis once the scheme is up and running. Ideally, in the long term, this role would simply be as recipient, and potentially auditor of key data, rather than having any involvement in its collation.

In addition to this, councils play a key role through all stages of the scheme as an advocate of the public interest – ensuring that scheme design and delivery results in the best outcome for ratepayers from a financial and waste minimisation perspective.

Council role in industry wide versus single brand schemes

⁴ Refer Utley, T (2009) Voluntary Environmental Accords: a case study analysis. Unpublished research paper in fulfilment of a Masters of Planning Practice: University of Auckland.

Another key consideration when considering 'BOOT' based product stewardship schemes, is whether or not schemes should be industry wide, or brand specific. This question needs to be considered separately for each product with a view to achieving the greatest degree of customer involvement in the scheme. In addition to this, councils should consider whether a national or regional scheme is most appropriate.

From the consumer perspective, industry schemes tend to be more effective. Customers want the product they have purchased to be appropriately disposed of regardless of who manufactured, imported, distributed or sold it when it was new.

Some companies decide to go it alone – setting up brand specific schemes where the expectation is that the business benefits of being viewed as responsible by the customer will counter the costs of running a scheme. However, from a customer perspective, waste is waste. At the end of a product's life, few care about the brand. Customer interaction through the Hazmobile indicates that community members are reluctant to sort their materials by brand for disposal, but appear willing to sort the materials by type (e.g. packaging, household batteries)⁵. This is reinforced by the kerbside recycling methodologies that customers are most familiar with. Sorting materials by brand can be confusing as brand labels may be difficult to read or be partially hidden on old labels.

The establishment of an industry wide scheme, however, is more complex than a single brand scheme. It requires scheme partners to negotiate issues of competitive advantage and work together collaboratively. In addition to this, there can be free riders, where companies who do not participate in the scheme benefit through their end of life products being disposed of, without contributing financially or changing their business practices. This issue is difficult to address in the absence of a mandatory requirement for scheme participation⁶.

The most helpful approach for the development of an even playing field in product stewardship schemes varies from industry to industry. A number of commentators suggest industry wide product stewardship schemes are more stable and able to meet customer needs⁷. Council can play a key role as a third party scheme manager, but has little scope to influence the free rider issue in this role.

Case Study: Used Oil Take Back Scheme

With 10 industry partners involved in the used oil scheme it was inevitable that the discussion around brand representation and logo would be a challenging one. To overcome this Council suggested strongly at an early stage that the scheme should not be branded or sponsored by any one partner. The approach proposed instead was to develop a brand identity for the scheme itself, and to use this as the basis for marketing and promotion. The primary aim of this was to reduce the possibility of confusing customers and also to ensure no partner gained a marketing advantage over another. It was agreed that there would be no partner branding allowed on any of the collection bins, which are the main public face of the scheme. Partner branding was allowed in supporting communications material, including free cardboard funnels, website and posters.

⁵ Ibid.

⁶ For further discussion refer to, ⁶ Refer Ministry for the Environment (2009) *Waste Minimisation in New Zealand – A discussion document from the Ministry for the Environment*.

⁷ Refer to, OECD(2003) *Voluntary approaches for environmental policy: effectiveness, efficiency and usage in policy mixes*, Paris, OECD, and also, Covec (2005) *Parliamentary Commission for the Environment Economic Instruments for Waste Management*, Auckland, Covec

Scheme partners were accepting of this approach, however, the main partner for drop off of used oil inadvertently received more recognition. This was because it was necessary to promote the location of drop off points, and impossible to do this without using the drop off partner's brand name. It is anticipated that this situation will resolve itself as more drop off point partners become involved in the scheme. Communication is a key aspect of any product stewardship scheme and needs to be managed carefully. The approach taken was seen as fair and pragmatic by scheme partners.

For a 'BOOT' approach, communications need to be actively managed at all stages of the process. In the 'build' and 'own' phases brand identity, planning and collateral development need to take place. This lays the groundwork for the 'operate' and 'transfer' phases, where communications need to be managed to ensure a consistent and fair roll out to the customer.

Potential concerns for Councils

While the discussion above explores the role for local and regional government in product stewardship schemes, involvement in such schemes is not without risks for councils. The experience of the used oil take back scheme has identified resourcing and scheme management as two potential issues in need of particular attention.

Resourcing

Managing scheme participant expectations around funding and council officer time is a key challenge. In most cases, business partners and funding agencies will expect councils to provide staff, resources and funds towards the set up of a new product stewardship scheme. This is particularly the case when scheme partners hold strong views around councils being the only bodies with any real responsibility for disposal of domestic waste. In the case of the used oil take back scheme, Council contributed significant time, funding and personnel resources toward the 'build', 'own' and 'operate' phases of the scheme. This was seen as a worthwhile investment in establishing the scheme, and was important in demonstrating commitment to industry partners.

A key implication of this for the design of future schemes is the need to set clear expectations around resourcing at all stages of the scheme. These need to be made explicit when agreeing to or deciding to become a scheme manager. Contractual agreements should be clear as to the full extent of any financial commitment. While not a problem experienced by the used oil scheme, provision also needs to be made to ensure that funding shortfalls, cost over-runs and other financial issues are planned for. Otherwise, scheme managers may be expected to cover any unforeseen the costs.

In terms of the 'BOOT' approach, resource planning needs to be a key component of the 'build' and 'own' steps. An initial scoping document and project plan detailing hours, funds and resources in kind is helpful in communicating what is involved, and provides a basis for early, transparent discussion about resourcing. These issues need to be clarified before the scheme heads into the 'operate' phase and enters the public realm.

Handing the scheme over

The most significant risk councils face when accepting scheme manager status is that the other partners might not accept the transference of responsibility when the time comes. This can threaten the long-term financial sustainability of the scheme, or lead to its failure, if no one takes on the scheme manager role. Extrication from the role of scheme manager can be very difficult if a clear exit plan is not established at the outset. Once a new service is set up, there is considerable pressure from community to ensure it is maintained. Customers are more likely to notice the removal of a service than the provision of a new service, so there can be community backlash if this occurs.

The most important way to address this issue is to ensure contractual arrangements in the product stewardship scheme contain an exit strategy to which all partners commit. Good planning and a comprehensive, well-supported transference plan are also important. There are a number of things to consider in the process of transferring the scheme to a third party manager, these include:

- Ensuring the new manager has the skills and experience to manage the scheme including negotiating with partners, evaluation and monitoring
- The ability of the scheme to be self funding (Is it reliant on grants? Will it be self funding? What can the partners commit?)
- The extent to which customers support the scheme (If it failed would there be an outcry? Is it used adequately to justify continuance?)

The 'BOOT' approach helps to manage the risk associated with handing over the scheme. Arrangements for transfer of the scheme manager responsibilities should be developed at the 'build' stage and finalised once the operation of the scheme is secure. In the case of the used oil scheme, this has been identified as the point at which it will be ready to be developed into a nationwide scheme. As with funding, this ensures the scheme does not come into the public eye before the exit arrangements for council are determined.

Nothing can completely remove the risk of the scheme falling over once council has withdrawn from the scheme manager role. Good planning and a comprehensive, well-supported transference plan can militate against it, as can implementation of a 'BOOT' approach. However, even with the 'BOOT' approach, councils should also consider the extent to which they will be prepared to intervene in the event that the scheme is at risk of failing.

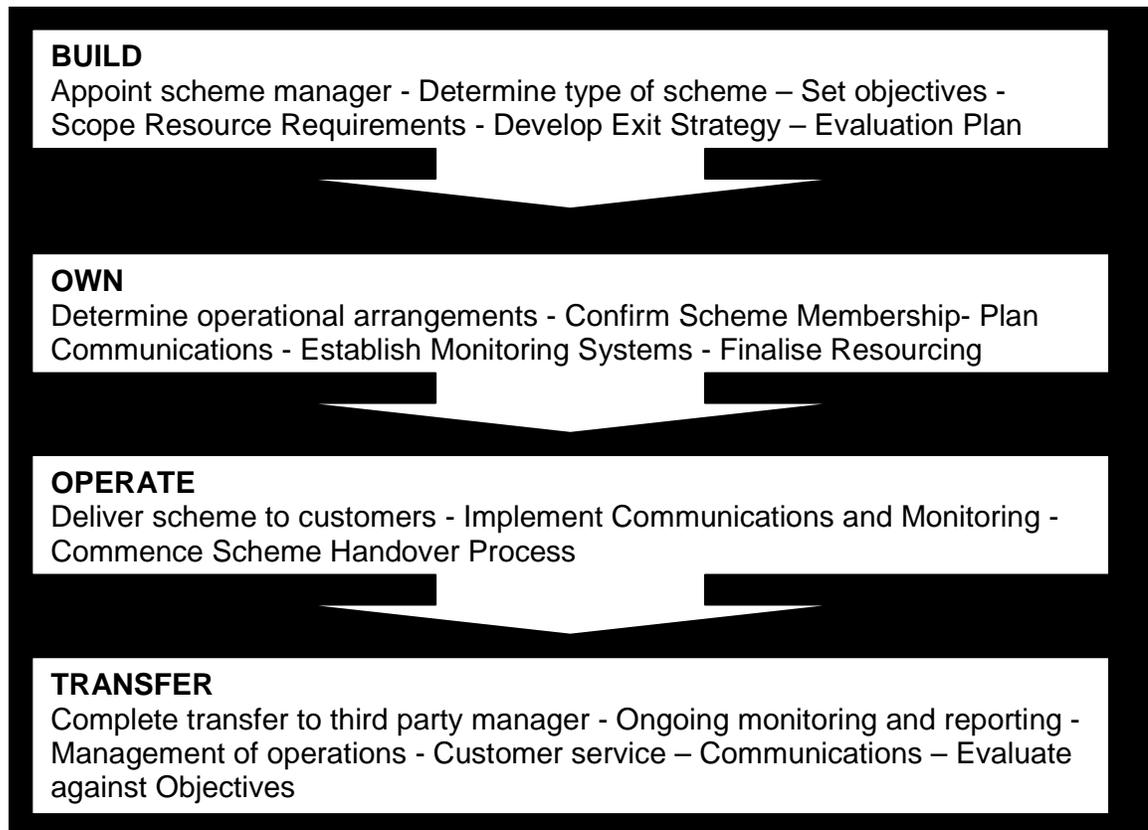
Conclusion

This paper has reflected on the initial experience of the used oil take back scheme, in order to identify lessons and consider the usefulness of taking a structured 'BOOT' approach for regional product stewardship.

The main advantage of adopting this approach is that it makes explicit the point at which the scheme is transferred to a third party scheme manager. In addition to this, the model supports good practice in regard to monitoring and reporting, communications, resource planning and delivery of the scheme to the customer. It also provides a clear way of managing the risks associated with scheme management and funding, before the scheme is launched into the public arena.

The key aspects of the 'BOOT' approach are summarised in to the diagram below. This represents Auckland Council's suggestion of using a structured BOOT approach, and will be refined over time. The outline provided below is proposed as a starting point for discussion.

Diagram One: Key components of a BOOT based product stewardship scheme



The initial experience of the used oil take back scheme has provided some important lessons. Its initial on-ground results are also encouraging. The following quote illustrate the feedback the scheme has been receiving from the community.

"I just came across this oil recycling scheme, and want to say how great it is. You have just earned yourselves a new customer, as I am glad that a motor industry company is doing its bit for the environment ... Well done, and please keep up the good work." (Catherine – via used oil website, 2011)

Auckland Council will continue to explore the application of a BOOT approach for future schemes and work toward a best practice model for product stewardship in its region.

References

Blutner, R (2009), *Auckland Regional Council Report: Management and disposal of waste oil from domestic sources in the Auckland region – issues and options for local government*, Auckland, Weitsicht Ltd

Covec (2005), *Parliamentary Commission for the Environment Economic Instruments for Waste Management*, Auckland, Covec

Ministry for the Environment (2009), *Waste Minimisation in New Zealand – A discussion document from the Ministry for the Environment*, Wellington, Ministry for the Environment

Ministry for Environment (2009), *Used Oil Recovery, Reuse and Disposal in NZ, Issues and Options*, Wellington, Ministry for the Environment.

OECD (2003), *Voluntary approaches for environmental policy: effectiveness, efficiency and usage in policy mixes*, Paris, OECD

6 July 2005 Speech: Launch of Product Stewardship and Water Efficiency Labelling Discussion Document.

