

SUBMISSION

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Te Kāhui Kaunihera o Aotearoa.

Managing
Aotearoa New
Zealand's waste
challenge.



Transforming Recycling

Local Government New Zealand's submission on the Ministry for the Environment's Transforming Recycling consultation document

May 2022

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We are. LGNZ. Local Government New Zealand (LGNZ) provides the vision and voice for local democracy in Aotearoa, in pursuit of the most active and inclusive local democracy in the world. LGNZ supports and advocates for our member councils across New Zealand, ensuring the needs and priorities of their communities are heard at the highest levels of central government. We also promote the good governance of councils and communities, as well as providing business support, advice, and training to our members.

Introduction

Thank you for the opportunity to comment on the Ministry for the Environment's (MfE) Transforming Recycling consultation document.

LGNZ welcomes the work that the Government is doing to review New Zealand's waste and recycling systems and has supported the need for this work for a number of years now. Standardising recycling and improving collection systems across the motu will respond to a number of concerns and opportunities that have been raised in the [Local Government Waste Manifesto](#) (which LGNZ supports), and by communities.

We broadly agree that the three proposals in the consultation document will lift the performance of New Zealand's recycling and resource recovery and support the much-needed shift towards a low-emissions, circular economy. However, the proposals will require new and significant investment by councils in processes and infrastructure to enable efficient and widespread collection, sorting and processing of recyclable materials. Real success will also depend on community behaviour change, regional collaboration and a myriad of other policy changes to support the proposed new approaches (such as regulation of waste operators, mandating collection of materials, and updating performance measures and reporting).

The three proposals

Container Return Scheme (CRS)

LGNZ sees value to councils and communities from a CRS, including reducing landfill costs and meeting emissions reductions and waste recovery targets. Central government should play a key role in establishing the scheme, which we believe should be not-for-profit and industry-led. We would expect that a robust regulatory and governance regime will be established to support high recovery rates and that allows the scheme to operate as efficiently as possible.

Kerbside collections

New Zealand's household kerbside recycling collections are highly variable in terms of who has access to collection, what materials are collected and how the materials are collected. This lack of consistency creates confusion for the public, which can make it difficult for recyclers to maintain streams of clean, high-quality materials that are free from contamination and can be easily recycled.

Standardising the materials collected nationally will reduce confusion, make it simpler for people to recycle, boost low recycling rates and encourage businesses to design and develop packaging that is recyclable anywhere in Aotearoa. To help reduce confusion, LGNZ encourages the Government to develop and distribute nationally a standard list of materials that every household kerbside recycling service will collect.

The aim of improving the performance of household kerbside collections means that in some cases this will require the establishment of new systems in communities where none exist currently. Councils without current systems will need sufficient time and financial support to be able to put adequate systems in place.

Food scraps collection – kerbside and business diversion

Broadly LGNZ supports a requirement for councils to provide food scraps collection services to all urban (>1000 population) households. However, smaller councils are likely to face significant funding and logistical challenges in implementing food waste collection. A phased approach to the introduction of food scraps collections before 2030, and support for smaller councils (both financial and practical) will be essential.

New infrastructure will be needed

Recycling systems across the motu vary according to the size of the city or town, costs of processing, and the importance individual communities place on balancing environmental, social and economic wellbeing outcomes. While we strongly support the intent of the Government's proposals, in order to deliver them significant investment in infrastructure, processes and systems will be needed. This will require major investment by communities – and in particular smaller communities in rural locations, or those with higher visitor numbers relative to ratepayers.

One of the themes we're hearing repeatedly in our discussions with councils about the Future for Local Government is the importance of councils being adequately resourced by central government to deliver initiatives that are central government led, but require implementation at the local level. Local government must be adequately resourced to implement the changes the Government is proposing if they are to deliver the intended positive outcomes for communities and the environment.

We are concerned by the lack of detail in the consultation document around how the Government will support councils and their communities to implement the proposals. We don't believe that the existing waste levy will cover the costs of the investment required, and believe that the private sector will need confidence in the new approaches before investing in local solutions. We encourage MfE to continue to engage with the local government sector to identify the funding and resourcing that will be needed to implement the proposals if they are adopted, and to develop a clear plan for transitioning to any new system.

A phased approach to implementation will help give councils and the private sector time to determine the types of processing infrastructure and systems that are needed. A phased approach will also provide time for identifying opportunities for regional collaboration and where economies of scale can be achieved in respect of planning and commissioning new facilities.

Alongside new systems, processing facilities and sorting technologies, the staff to design, operate and manage them will also be needed. Local government is currently experiencing a skills shortage

at all levels. MfE must work in partnership with local government to develop a workforce strategy, which identifies the level of staffing needed to implement the proposals. It should include strategies for partnerships, education and training programmes to support the rollout of changes. For example, we see an opportunity for MfE to partner with the Mayors' Taskforce for Jobs to strengthen the creation of new jobs across local communities.

Changing the public's behaviour

While the proposals will help to change the public's behaviour and attitudes towards waste and recycling, we strongly support the need for a widespread national education campaign to help raise public awareness and drive behaviour change – which will take some time to bed in. While local government will help to drive public awareness and behaviour change across its communities, a nationally led and nationally funded public awareness programme is appropriate given that these initiatives are proposed to be rolled out across the country.

Alignment with other reform and policy work programmes

There are a number of reform programmes and policy initiatives underway impacting on local government, including the Three Waters and Resource Management Reforms, Review into the Future for Local Government, and the Government's climate change work programme. Cumulatively, these are having significant impact on local government's capacity – particularly on top of councils' business as usual roles and functions. We encourage MfE to give greater consideration to how these proposals will align with the timing of and transition arrangements for other reform and policy programmes. This is particularly critical from a workforce capacity point of view.

As part of the plan for the transition to and implementation of these new approaches, MfE must work with local government to identify how recycling and waste management services, roles and responsibilities will intersect with other local government roles and responsibilities in a post-reform future. There is, for example, an opportunity to think about how the review of the Waste Management Act and implementation of the national Waste Strategy can align with the outcomes in the proposed Natural and Built Environments Act, and how regional recycling and waste management provision can be prioritised and provided for under the Strategic Planning Act. Recycling and waste management must be aligned with future development needs that will be identified in the proposed regional spatial strategies (which in turn could inform the proposed national Waste Action and Investment Plan).

Ongoing engagement

For this ambitious work programme to be successful and deliver the transformational outcomes that the Government is seeking, it is critical that MfE works in partnership with local government on the design and delivery of the proposed new approaches. This should include working in partnership to identify the new investment in processes and infrastructure that will be needed, and the financial support that councils will need to deliver that investment.

Conclusion

LGNZ is happy to support MfE officials to find ways to partner with councils as this work progresses and looks forward to continuing to work with the Government on its wider waste work programme.

If you have any questions or would like to discuss any aspects of this submission in further detail please contact Nicci Wood, Principal Policy Advisor at nicci.wood@lgnz.co.nz.