



RUAPEHU DISTRICT COUNCIL

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18 May 2022

To: Ministry for the Environment
transformingrecycling@mfe.govt.nz

Subject: **Transforming Recycling consultation**

Submission from: Ruapehu District Council
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Council does not wish to speak in support of its submission.

The Ruapehu District ... where adventure begins!



1 PART 1 QUESTIONS

- 1.1 **Do you agree with the proposed definition of a beverage?**
Yes.
- 1.2 **Do you agree with the proposed definition of an eligible beverage container?**
Yes.
- 1.3 **Do you support the proposed refund amount of 20 cents?**
Yes – needs to be flexibility for deposit amount to reflect waste hierarchy, utilising eco-modulation to incentivise eco-friendly choices.
- 1.4 **How would you like to receive your refunds for containers? Please select all that are relevant and select your preference.**
All options relevant for our ratepayers but for us as a Council, if we are a collection point or if we are returning containers, preferably electronic funds transfer.
- 1.5 **Do you support the inclusion of variable scheme fees to incentivise more recyclable packaging and, in the future, reusable packaging?**
Yes.
- 1.6 **Do you agree with the proposed scope of beverage container material types to be included in the NZ CRS?**
Yes
- 1.7 **If you do not agree with the proposed broad scope (refer to Question 6), please select all container material types that you think should be included in the scheme.**
• glass
• plastic (PET 1, HDPE 2, PP 5, and recyclable bio-based HDPE and PET)
• metal (eg, aluminium and non-ferrous metals such as steel, tinplate and bi-metals)
• liquid paperboard
N/A.
- 1.8 **Do you support a process where alternative beverage container packaging types could be considered on case-by-case basis for inclusion within the NZ CRS?**
Yes.
- 1.9 **Do you agree with the proposal to exempt fresh milk in all packaging types from the NZ CRS?**
Yes.
- 1.10 **Do you support the Ministry investigating how to target the commercial recovery of fresh milk beverage containers through other means?**
Yes.
- 1.11 **Do you support the Ministry investigating the option of declaring fresh milk beverage containers made out of plastic (eg, plastic milk bottles and liquid paperboard containers) a priority product and thereby including them within another product-stewardship scheme?**
Yes.



- 1.12 We are proposing that beverage containers that are intended for refilling and have an established return/refillables scheme would be exempt from the NZ CRS at this stage.
Do you agree?**
Yes.
- 1.13 Should there be a requirement for the proposed NZ CRS to support the New Zealand refillables market (eg, a refillable target)?**
Yes, although could be included in waste strategy rather than CRS.
- 1.14 Do you have any suggestions on how the Government could promote and incentivise the uptake of refillable beverage containers and other refillable containers more broadly?**
Funding of 'refillable's' infrastructure and support systems, including legislative changes if required. Refillables must be made the preferred option, i.e. glass to be cheaper than existing option. This gives people a reason to change.
- 1.15 Are there any other beverage packaging types or products that should be considered for exemption?**
No.
- 1.16 Do you agree that the size of eligible beverage containers would be 3 litres and smaller?**
Yes.
- 1.17 Do you think that consumers should be encouraged to put lids back on their containers (if possible) before they return them for recycling under the scheme?**
No preference. Regardless of the answer, it needs to be consistent with kerbside messaging to avoid contamination and confusion.
- 1.18 Do you agree that the scheme should provide alternative means to capture and recycle beverage container lids that cannot be put back on containers? If so, how should they be collected?**
This issue needs to go back to MfE to investigate the best way to achieve this. Could be done through container recycling process as well.
- 1.19 Do you agree that a NZ CRS should use a 'mixed-return model' with a high degree of mandated retail participation to ensure consumers have easy access to container return/refund points, as well as the opportunity for voluntary participation in the network by interested parties?**
Yes.
- 1.20 Where would you find it easiest to return eligible beverage containers? Please select all that are relevant and rank these from most preferred to least preferred.**
- 1. Supermarket**
 - 2. Local retail outlet that sells beverages (eg, dairy, convenience store, bottle shop, petrol station)**
 - 3. Community recycling/resource recovery centre**
 - 4. Other community centres/hubs (eg, town hall, sports club, etc)**
 - 5. Commercial recycling facility (eg, depot, more likely to be located in industrial zone)**



- 6. Shopping centre/mall
- 7. Waste transfer station
- 8. Other (please specify)

1.21 Retailers that sell beverages are proposed to be regulated as part of the network (mandatory return-to-retail requirements). Should a minimum store size threshold apply?

Yes.

And if yes, what size of retailer (shop floor) should be subject to mandatory return-to retail requirements?

Preference would be 300m² or larger.

1.22 Do you think the shop-floor-size requirements for retailers required to take back beverage containers (mandatory return-to-retail) should differ between rural and urban locations?

Yes, to ensure whatever the threshold is that there are facilities available for all communities without overburdening a lot of small businesses. Need to do checks here on impact of definition of 'rural' and 'urban' to find the balance. It would also depend on how long store time is. Collections need to be consistent and weekly or monthly.

If yes, what lower size threshold should be applied to rural retailers for them to be required to take back containers?

As per above, with the intent of ensuring facilities are available for all communities while not going too far. Likely to need to capture the size of a dairy.

1.23 Do you agree that there should be other exemptions for retailer participation? (For example, if there is another return site nearby or for health and safety or food safety reasons.)

Yes.

1.24 Do you agree with the proposed 'deposit financial model' for a NZ CRS?

Yes.

1.25 Do you agree with a NZ CRS that would be a not-for-profit, industry-led scheme?

Yes.

1.26 Do you agree with the recovery targets for a NZ CRS of 85 per cent by year 3, and 90 per cent by year 5?

Yes.

1.27 If the scheme does not meet its recovery targets, do you agree that the scheme design (including the deposit level) should be reviewed and possibly increased?

Yes.

1.28 Do you support the implementation of a container return scheme for New Zealand?

Yes.

1.29 If you do not support or are undecided about a CRS, would you support implementation of a scheme if any of the key scheme design criteria were



different? (eg, the deposit amount, scope of containers, network design, governance model, scheme financial model, etc). Please explain.
N/A.

1.30 If you have any other comments, please write them here.
N/A.

PART 2 QUESTIONS

Proposal 1: Collecting a standard set of materials

- 2.1 **Do you agree with the proposal that a standard set of materials should be collected for household recycling at kerbside?**
Yes. Our district has a high number of non-permanent residents who reside elsewhere, it is challenging for us if the messaging is not consistent.
- 2.2 **Do you agree that councils collecting different material types (in addition to a standard set) might continue to cause public confusion and contamination of recycling?**
Yes, and more so for our district with high number of non-permanent residents.
- 2.3 **Do you think that national consistency can be achieved through voluntary measures, or is regulation required?**
Regulation is likely required, with subsidisation for Councils who need it.
- 2.4 **Please tick below all the items from the proposed list which you agree should be included in the standard set of materials that can be recycled in household kerbside collections.**
- glass bottles and jars
 - paper and cardboard
 - pizza boxes
 - steel and aluminium tins and cans
 - plastic bottles 1 (PET) and 2 (HDPE)
 - plastic containers and trays 1 (PET) and 2 (HDPE)
 - plastic containers 5 (PP)
- All items included.
- 2.5 **If you think any of the materials above should be excluded, please explain which ones and why.**
No.
- 2.6 **If you think any additional materials should be included, please explain which ones and why.**
N/A.
- 2.7 **Do you agree that the standard set of materials should be regularly reviewed and, provided certain conditions are met, new materials added?**
Yes, but consulted on to assess impact on Councils.
- 2.8 **What should be considered when determining whether a class of materials should be accepted at kerbside in the future? (Tick all that apply)**



- **sustainable end markets**
- **end markets solutions are circular and minimise environmental harm**
- **viable processing technologies**
- **processing by both automated and manual material recovery facilities**
- **no adverse effects on local authorities, including financial**
- **supply chains contribute appropriately to recovery and end-of-life solutions for their products**
- **other –**

Collection and processing should be funded by the industry that produces or imports those items. There needs to be more emphasis on kerbside collection especially if there are environmental options for recycling goods.

2.9 Who should decide how new materials are added to the list?

- **the responsible Minister**
- **Ministry for the Environment staff in consultation with a reference stakeholder group**
- **existing Waste Advisory Board**
- **an independent board**
- **other (please specify).**

The Minister and the Waste Advisory board but should be in consultation with Local Government to ensure impact has been assessed.

2.10 Do you agree that, in addition to these kerbside policies, New Zealand should have a network of convenient and easy places where people can recycle items that cannot easily be recycled kerbside? For example, some items are too large or too small to be collected in kerbside recycling.

Yes, although we would need to consider funding options e.g. funded by Central Government, as this would be challenging for our Council and/or Ratepayers to fund this.

Proposal 2: All urban populations should have access to kerbside food scraps collections

3.1 Do you agree that food and garden waste should be diverted from landfills?

Yes.

3.2 Do you agree that all councils should offer a weekly kerbside food scraps collection to divert as many food scraps as possible from landfills?

Yes, for urban areas, although funding of this in our Council would be challenging with low number of permanent residents, population spread (urban areas are far apart from each other in our district) and high deprivation. Central Government would need to provide support to Councils, such as ours, who would struggle to pass on costs to ratepayers.

3.3 Do you agree that these collections should be mandatory in urban areas (defined as towns with a population of 1000 plus) and in any smaller settlements where there are existing kerbside collections?

Yes, although we would need assistance with funding (see 3.2).

3.4 Do you think councils should play a role in increasing the diversion of household garden waste from landfills? If so, what are the most effective ways for councils to divert garden waste?



Yes, through making it more affordable for people to drop-off green waste at transfer stations, cost would need to be spread across ratepayers to achieve this though.

3.5 We propose a phased approach to the roll-out of kerbside food scraps collections. The timeframes will depend on whether new processing facilities are needed. Do you agree with a phased approach?

Yes, but we would need additional funding (see 3.2).

3.6 Do you agree that councils with access to suitable existing infrastructure should have until 2025 to deliver food scraps collections?

No, that's not enough time to factor it into LTP and renegotiate contracts.

3.7 Do you agree that councils without existing infrastructure should have until 2030 to deliver food scraps collections?

Yes.

3.8 Are there any facilities, in addition to those listed below, that have current capacity and resource consent to take household food scraps?

There is a Mynoke Vermicomposting site in Ruapehu. Our District has challenging geographics (large land area and disbursed urban population), so may not be viable to take scraps from the whole district.

We propose to exclude the following non-food products and any packaging from any kerbside collection bins used to divert food scraps and/or green waste from landfills:

- kitchen paper towels / hand towels / serviettes
- newspaper and shredded paper
- food-soiled cardboard containers (eg, pizza boxes)
- cardboard and egg cartons
- compostable plastic products and packaging
- compostable fibre products and packaging
- compostable bin liners
- tea bags

Agree – standardisation of food scraps would need to be a consistent message. Our district has a high number of non-permanent residents who reside elsewhere, it will be challenging for us if messaging is not consistent.

3.9 Are there any additional materials that should be excluded from kerbside food and garden bins? Please explain which ones and why.

Yes – animal/human waste, liquids, cat litter. Health board needs to consider mechanisms to reduce medical waste being placed in this bin.

3.10 For non-food products or packaging to be accepted in a food scraps bin or a food and garden waste bin, what should be taken into consideration?

- Products meet New Zealand standards for compostability.
- Products are clearly labelled so that they can be distinguished from non-compostable products.
- Technology is available to easily identify and sort compostable from non-compostable products.
- Producers and users of the products and packaging contribute to the cost of collecting and processing.



- 3.11 If you think any of the materials listed above should be included in kerbside food and garden bins, please explain which ones and why.**
We do not think this should be included.

Proposal 3: Reporting on household kerbside collections offered by the private sector

- 4.1 Do you agree that it is important to understand how well kerbside collections are working?**
Yes.
- 4.2 Do you agree with the proposal that the private sector should also report on their household kerbside collections so that the overall performance of kerbside services in the region can be understood?**
Yes.
- 4.3 Do you agree that the information should be published online for transparency?**
Yes, as long as the information is consistent with local processes.
- 4.4 Apart from diversion and contamination rates, should any other information be published online?**
Yes, information about final destination and use of products i.e., onshore or offshore. Contamination rates or percentages of recycling that end up in landfill should be published and have a KPI.

Proposal 4: Setting targets (or performance standards) for councils

- 5.1 Should kerbside recycling services have to achieve a minimum performance standard (eg, collect at least a specified percentage of recyclable materials in the household waste stream)?**
Yes, but needs to apply to both councils and the private sector. Support also needs to be provided to Councils for education of ratepayers and support provided for Councils with funding challenges.
- 5.2 Should the minimum performance standard be set at 50 per cent for the diversion of dry recyclables and food scraps?**
No, different councils have different levels of contamination and ratepayer uptake. A staged approach would be appropriate with support provided to Councils to achieve targets.
- 5.3 We propose that territorial authorities have until 2030 to achieve the minimum performance target, at which time the target will be reviewed. Do you agree?**
Yes, provided support is provided (see 5.2).
- 5.4 In addition to minimum standards, should a high-performance target be set for overall collection performance to encourage territorial authorities to achieve international best practice?**
Yes, staged over time with appropriate support provided.



5.5 Some overseas jurisdictions aim for diversion rates of 70 per cent. Should New Zealand aspire to achieve a 70 per cent target?
Yes.

5.6 What should the consequences be for territorial authorities that do not meet minimum performance standards?
No consequences, only support to councils to achieve standards. Different Councils have different challenges and considerations to factor in.

Proposal 5: Should glass and/or paper/cardboard be collected in separate containers?

6.1 Should either glass or paper/cardboard be collected separately at kerbside in order to improve the quality of these materials and increase the amount recycled?

- glass separate
- paper/cardboard separate
- separated, but councils choose which one to separate
- status quo – they remain comingled for some councils.

Glass and paper/cardboard separate as best practice where possible. Need to ensure this works for all Councils though and provide support where challenging. We have a low resident population, large land area and disbursed urban centres so cost impact is likely to be a lot higher than other Councils.

6.2 If glass or paper/cardboard is to be collected separately, should implementation:

- begin immediately
- wait for any CRS scheme design to be finalised
- wait until the impact of a CRS scheme has been observed.

Wait for any CRS scheme design to be implemented which hopefully will account impact on different Councils.

Proposal 6: Should all urban populations have access to a kerbside dry recycling collection?

7.1 Should all councils offer household kerbside recycling services?
For urban populations, yes.

7.2 Should these services be offered at a minimum to all population centres of more than 1,000 people?
Yes.

7.3 Do you agree that councils without any council-funded kerbside recycling collections should implement these collections within two years of their next Waste Management and Minimisation Plan?
No, as different councils have different timeframes for WMMP's.

7.4 What research, technical support or behaviour change initiatives are needed to support the implementation of this programme of work?
Nationwide education, funding and assistance provided by Central Government, as required.



Part 3 Questions

Proposal: Source separation of food waste is phased in for all businesses.

- 8.1 Should commercial businesses be expected to divert food waste from landfills as part of reducing their emissions?**
Yes.
- 8.2 Should all commercial businesses be diverting food waste from landfills by 2030?**
Yes, definition of commercial business needs to be finalised.
- 8.3 Should separation be phased in, depending on access to suitable processing facilities (e.g., composting or anaerobic digestion)?**
Yes.
- 8.4 Should businesses that produce food have a shorter lead-in time than businesses that do not?**
It depends on what access to facilities is available – since raw untreated commercial scraps containing meat are not legally able to be fed to pigs, this is counterintuitive
- 8.5 Should any businesses be exempt? If so, which ones?**
No but needs to consider support for small businesses.
- 8.6 What support should be provided to help businesses reduce their food waste?**
Access to collections, infrastructure, support for establishment of food rescue schemes, education.

