



Executive Summary

The Glass Packaging Forum supports the proposed waste strategy's focus on the vision of creating a more circular economy and welcomes the review of legislation and regulation to support this.

We believe we need to be bold in our aspirations to reach our objective to improve Aotearoa New Zealand's record on waste to become one of the best in the OECD.

Our response to the proposed waste strategy is from a glass packaging perspective. Our response is geared toward the benefit of product stewardship and improved regulatory framework.

Glass recycling is the perfect example of the circular economy in action, with over 120,000 tonnes of glass being recycled right here in Aotearoa. Our members are already committed to improving the sustainability outcomes for glass.

As an accredited product stewardship scheme, we welcome the opportunity to streamline guidelines and processes for the creation of best practice voluntary, accredited and regulated mandatory product stewardship schemes that address the whole of product life-cycles, not just recovery.

We believe government needs to engage early and effectively with business and industry in order to leverage the know-how and innovation that resides in the sector and to engage on cost-effective and efficient system design.

THE GLASS PACKAGING FORUM (GPF)

The GPF is one of two voluntary accredited product stewardship schemes operated by The Packaging Forum, a membership organisation representing over 180 companies and hundreds of brands throughout the supply chain.

Members of the Glass Packaging Forum pay levies to fund projects which overcome the barriers to better outcomes for glass. Container glass is an example of an endlessly recyclable material - the circular economy in action. The GPF works across the supply chain to support best practice collection methodology and overcome barriers to recycling that include contamination, storage infrastructure and logistics. We also support reuse programmes. The GPF advocates for a regulated product stewardship scheme that will cover all container glass, not just the beverage containers that would otherwise be included in a CRS. To this end we have requested the Minister for the Environment declare container glass a priority product under the Waste Minimisation Act 2008.

Summary position

VISION

We support the vision of the waste strategy. It is unacceptable that New Zealand is one of the highest generators of waste per person in the world. Continued reliance on linear disposal in



not acceptable. While container glass boasts a relatively high recovery and recycling rate, we believe far more can and should be achieved to reduce loss to landfill.

BUSINESS ENGAGEMENT

Our member businesses play a vital part of delivery in the circular economy, yet in some places in the document we assume it is what is referred to as “and others.” It is disappointing that the input of business appears not to have been part of the advisory process. Business and industry are not only key stakeholders in the strategy, but also have expertise in system design and identifying efficiencies and synergies that can help deliver the outcomes we aspire to.

DATA AND TARGETS

Good data is crucial to creating positive change. We are heartened to see that systematic data collection is a key part of the strategy. Lack of a single source of data at appropriate points in the supply chain has forced the GPF to rely on multiple data sources of varying quality that must be cross referenced in order to measure outcomes.

Grant Thornton’s recent review of the GPF’s data methodology also found the best data points are at the beginning and end of container glass lifecycle. This leaves data gaps, such as where loss occurs, which must be filled through estimation based on industry knowledge.

In terms of the targets proposed by the Ministry for stage one it’s not clear where the baseline data is coming from and when it will be set considering we don’t have adequate systems in place already.

PACKAGING

Packaging is mentioned specifically throughout the document, despite the fact that it makes up only 14% of total municipal waste to landfill. Glass has a 75% recovery rate (2019/20) and low representation in landfill disposal. It’s concerning that other sectors which make up a far greater proportion of waste to landfill appear to have been given less thought.

Glass also has a negligible impact in terms of litter, with the primary impact the GPF seeks to address being glass’s carbon footprint through the use of virgin material or imported containers over NZ-made recycled containers.

PRODUCT STEWARDSHIP SCHEMES

Business holds the key to designing and delivering cost-effective product stewardship schemes with equitable outcomes.

We support best practice product stewardship on both a voluntary and regulatory model. If the right mechanisms are in place to support the creation of best practice voluntary schemes, fewer will need to be mandated, which will minimise the compliance burdens on businesses and consumers.

We believe improved data will go a long way towards enabling voluntary schemes to perform more effectively. Regulated schemes typically have strong, reliable data as reporting is built into scheme design and is mandatory for members.



We don't believe any scheme should have its management, fee structure or delivery mechanisms set by government. Government should be involved in setting targets, schemes should be designed to deliver on them.

RECYLABILITY LABELLING

We recognise a system is required and do not support a New Zealand-only system. Many of our members currently use the ARL (Australasian Recycling Label) as they operate cross-Tasman. Labelling is an issue for glass packaging due to material loss caused by labelling adhesive.

DUTY OF CARE

We support the concept of duty of care. A careful analysis of each duty of care needs to be undertaken to ensure it is practical and that the overall benefits outweigh the cost burden to implement and enforce them.

LITTER

Litter is largely a social problem in some cases exacerbated by lack of access to services. International research shows the most effective way to reduce litter is to change attitudes, awareness and behaviour through education, incentives, building community engagement and ownership of the problem. The duty of care for litter must remain with the consumer/individual not the producer. Industry should not be held responsible financially or otherwise for illegal littering.

WASTE LEVIES

The increased waste levy presents an opportunity to make some big gains by addressing Aotearoa's infrastructure gaps and to invest in innovation at the top of the waste hierarchy. For this reason, the status quo of a 50/50 split with councils should be revised. Allocation should be based on the potential impact of the spend.

Part 1: Why we need to transform our approach to waste

1. DO YOU THINK CHANGES ARE NEEDED IN HOW AOTEAROA NEW ZEALAND MANAGES ITS WASTE?

Yes.

New Zealand should be aiming to be the lowest producer of waste in OECD. We believe there needs to be focus on resource recovery, not simply waste reduction. We must take a holistic approach with a focus on New Zealand developed and funded solutions. Export of waste should be a last resort except where outcomes are superior e.g. chemical recycling of plastic not available onshore that enables food-safe, fully circular solutions.

2. DO YOU SUPPORT TACKLING OUR WASTE PROBLEMS BY MOVING TOWARDS A CIRCULAR ECONOMY?

Yes.

We generally support the principles of a circular economy. Glass is already a working model.



Part 2: Proposed new waste strategy for Aotearoa New Zealand

3. DO YOU SUPPORT THE PROPOSED VISION?

Yes.

4. DO YOU SUPPORT THE SIX CORE PRINCIPLES OR WOULD YOU MAKE CHANGES?

Yes –with some changes

Attempting to address legacy waste as part of a circular systems is flawed. They should be defined as two separate principles.

We believe equitable outcomes needs further definition. We support: Deliver equitable environmental, social, and economic outcomes.

We support thinking in systems where everything is interconnected, but emphasise that all interdependencies and risks of unintended consequences should be addressed. For example, container deposit schemes in some overseas jurisdictions have had the unintended consequence of the upsizing of containers, with an associated risk of creating poorer social outcomes.

5. DO YOU SUPPORT THE PROPOSED APPROACH OF THREE BROAD STAGES BETWEEN NOW AND 2050, AND THE SUGGESTED TIMING AND PRIORITIES FOR WHAT TO FOCUS ON AT EACH STAGE?

We believe this is not ambitious enough. Stage One is over too long a time frame.

We believe judicious investment of the Waste Levy can make a difference much sooner. E.g.

- Infrastructure with the highest level of impact where most needed
- Innovation at the top of the waste hierarchy
- Partnerships with industry to develop circular solutions
- Dealing with legacy issues

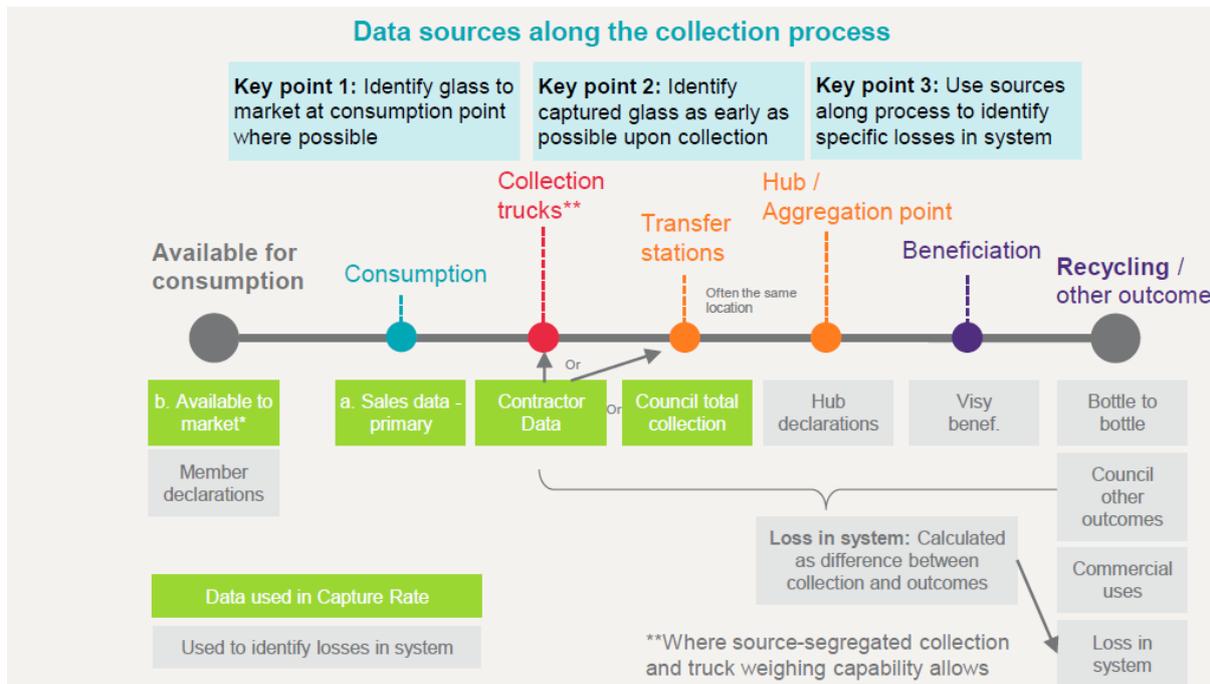
6. LOOKING AT THE PRIORITIES AND SUGGESTED HEADLINE ACTIONS FOR STAGE ONE, WHICH DO YOU THINK ARE THE MOST IMPORTANT?

Priority 1: Build a practice of systematically collecting good data, evaluating it and publicly reporting on progress.

Comment:

- Understanding the volume of packaging material in the market is currently a challenge for all packaging material types, including glass.
- A single source of truth for data is therefore essential as the basis of good decision making. It's important that data is captured at the correct points for all materials so that we can target improvements. In terms of glass, Grant Thornton's recent review of the GPF's data methodology found the best data points are at the beginning and end of

container glass lifecycle. This leaves data gaps, such as where loss occurs, which must be filled through estimation based on industry knowledge. The table below shows additional points where data could be captured under a regulatory regime. If a cloud database were created which all parties along the supply chain (from producers and importers to collectors and processors) could feed data into, it would enable the stewardship scheme (be it regulated or voluntary) to access reliable data in real time.



Priority 1: Put in place new and strengthened investment systems and programmes, so we make best use of the waste levy funds to support the strategy’s goals.

Comment:

Wise use of the waste levy is vital. This should be focused on innovation that can make the biggest impact as high up the waste hierarchy as possible. Partnerships with business are essential to this.

Priority 1: Develop strong collaborative relationships and ways of working with iwi/Māori, local government and others whose input will be critical to success.

Comment:

- Business is not mentioned in this headline priority, it is lumped under “others.” Engaging with business and tapping into business knowledge is a vital part of transformation.

Priority 4: Get resource recovery and recycling systems working well

Comment:

- Much of this can be implemented now, and built on or modified as further systems are implemented.



- These should be clearly marked within the roadmap as 2022-23 goals. As currently written they could drag to 2030.
- Supporting this approach, a central data base and data collection model is immediately required to support best outcomes.

7. WHAT ELSE SHOULD WE BE DOING IN STAGE ONE?

Change the wording of the statement: Encourage the development of uses and markets for recycled material, so resource recovery and recycling become financially sustainable.

Remove “encourage the development” and change to “Develop economically viable solutions and supporting regulatory framework to deliver circular material solutions.” This would more strongly link the priority to the product stewardship section.

Working much more closely with business to fast-track change. Glass Packaging Forum members have already committed to having packaging reusable, recyclable or compostable by 2025. Many businesses have integrated sustainability targets into their business plans. Government can work more closely with business to support system change that would help achieve these shared goals.

8. WHAT ARE THE BARRIERS OR ROADBLOCKS TO ACHIEVING THE STAGE ONE ACTIONS, AND HOW CAN WE ADDRESS THEM?

- Specific to packaging, the proposed CRS has created a negative impact on a whole-of-material solution and progression by all parties. Simply placing the decision within the Stewardship framework would better align with the principle of equity (6)
- There is a lack of clear, comprehensive and accurate data to justify and direct actions to achieve the greatest change for NZ. An example of this is the finds of the Grant Thornton report on the GPF’s data methodology. It found the best data points are at the beginning and end of the container glass lifecycle. As a result there are knowledge gaps on what material loss is occurring and educated assumptions must be made to fill these gaps. A national database is therefore urgently required, supported by legislation for the collection of this data. Creating a single, cloud-based data source which has inputs from all stakeholders along a product’s supply chain would provide the data certainty that is currently lacking. This in turn would greatly aid decision making.
- Data should be the driver behind system design and change, implementing system change without having reliable data to inform system design could be costly both in terms of economics, but also in achieving the desired outcomes and timeframes. The GPF is using the best available data for its mass balance, however there is still room for improvement.

9. DO THE STRATEGIC TARGETS LISTED IN TABLE 1 FOCUS ON THE RIGHT AREAS?

No

- For all of these it is unclear how and when the baseline will be set, given we don’t have clear data.



- Litter is a primarily social issue and therefore while it should be a measure of principle 2 & 6 it should not be a target rather an indicator of success. Focussing on litter per se will deliver poor system outcomes.
- Business waste reduction. How is this defined? When does business waste become household waste? The premise is business lacks the infrastructure and therefore has a lower target is incorrect. All global corporates (linked to a large part of the business footprint) have clear shareholder and legislative regulations to meet. Many have already implemented packaging waste solutions that exceed these targets.
- Household waste: Clearly this is a function of several key decisions, collection methods (clean streams), ease of access, cost benefit and processing capacity? No clarity how these ambitions have been created. In addition to collections, 40% of waste at transfer stations comes from households. How will this be incorporated?
- Targets for recycled content to incentivise circular economy application could be considered. This appears to be driving change and innovation in packaging in Australia.

10. WHERE IN THE SUGGESTED RANGES DO YOU THINK EACH TARGET SHOULD SIT, TO STRIKE A GOOD BALANCE BETWEEN AMBITION AND ACHIEVABILITY?

- Would need sufficient data and clarity of methodology to provide guidance.

Part 3: Developing more comprehensive legislation on waste: issues and options

Embedding a long-term, strategic approach to reducing waste

11. DO YOU THINK THE NEW LEGISLATION SHOULD REQUIRE THE GOVERNMENT TO HAVE A WASTE STRATEGY AND PERIODICALLY UPDATE IT?

Yes

12. HOW OFTEN SHOULD A STRATEGY BE REVIEWED?

- Ideally aligned with local government waste management and minimisation cycle.

13. HOW STRONGLY SHOULD THE STRATEGY (AND SUPPORTING ACTION AND INVESTMENT PLANS) INFLUENCE LOCAL AUTHORITY PLANS AND ACTIONS?

- The strategy should be clearly linked to local authority plans and actions as well as being linked to product stewardship priorities.

14. WHAT PUBLIC REPORTING ON WASTE BY CENTRAL AND LOCAL GOVERNMENT WOULD YOU LIKE TO SEE?

Government should lead with transparent data by council, department or agency.

- Procurement policies that support the circular economy e.g. recycled content of purchases, recyclability or end of life solution for purchases.
- Tonnage of waste generated, recovered for recycling and disposed of.
- MFE should collate data sets by local authority, district and region



- Mass balance of material to market as already undertaken by the GPF.

The GPF strongly believes that Councils should not be able to subsidise existing services (long term) with funding received to improve waste minimisation outcomes.

15. DO YOU AGREE WITH THE SUGGESTED FUNCTIONS FOR CENTRAL GOVERNMENT AGENCIES?

No. The manner in which this statement is written is still ambiguous. We support that this will be a tiered approach, and there should a strong statement requiring local authorities to provide collection services and ensure best practice recycling and disposal. However, there is significant clarity needed around:

- A strong requirement for local authorities to adhere to the strategy.
- Minimum standard expectations need to be developed, e.g. material collection standardisation based on best outcomes for all recyclable materials (not just what is more convenient to collect).
- How council practices could be linked to product stewardship programmes.
- Accountability for best use and highest impact of waste levy and WMF funding.

16. WHAT CENTRAL AGENCIES WOULD YOU LIKE TO SEE CARRY OUT THESE FUNCTIONS?

This needs to have two key aspects that are independent of each other:

1. Regulatory and policy setting including targets e.g. MfE
2. Operational performance and delivery. E.g. EPA or MBIE

17. HOW SHOULD INDEPENDENT, EXPERT ADVICE ON WASTE BE PROVIDED TO THE GOVERNMENT?

The government has a waste advisory board and has been the model operated for the last few iterations. While this can be effective their recommendations must have significant influence on strategy. This group needs to be highly visible to all stakeholders and balanced across, producers, retailers, waste lobby and interested groups. Members shall have a maximum tenure and must formally stand down for at least one term before being able to re-stand.

18. HOW COULD THE LEGISLATION PROVIDE FOR MĀORI PARTICIPATION IN THE NEW ADVICE AND DECISIONMAKING SYSTEMS FOR WASTE?

The Glass Packaging Forum does not have a view on this.

19. WHAT ARE YOUR VIEWS ON LOCAL GOVERNMENT ROLES IN THE WASTE SYSTEM, IN PARTICULAR THE BALANCE BETWEEN LOCAL AND REGIONAL? WHO SHOULD BE RESPONSIBLE FOR PLANNING, SERVICE DELIVERY, REGULATORY ACTIVITIES LIKE LICENSING, AND ENFORCEMENT OF THE DIFFERENT OBLIGATIONS CREATED?

From a product stewardship perspective:



- The document lacks clarity as to how a stewardship scheme can utilise current kerbside infrastructure and how financial processes allow the schemes access to funds currently allocated to local authorities.
- The regional council function is often only as the regulator and does not have a clear function.

As above enforcement should sit with and/or be overseen by a separate body EPA or MBIE.

Putting responsibility at the heart of the new system

20. DO YOU SEE BENEFIT IN ADAPTING THE UNITED KINGDOM'S DUTY-OF-CARE MODEL FOR AOTEAROA NEW ZEALAND'S WASTE LEGISLATION, SUPPORTED BY APPROPRIATE OFFENCES AND PENALTIES?

We support the intent of the statement, however more clarity is required within a regulatory framework for NZ especially around how product stewardship is intended to be supported and what regulatory penalties are proposed.

We would like to see a formal engagement with the UK's Department for Environment Food & Rural affairs to ascertain what aspects have delivered the best outcomes.

21. DO YOU SUPPORT STRENGTHENING OBLIGATIONS AROUND LITTER BY CREATING AN INDIVIDUAL 'DUTY OF CARE' TO DISPOSE OF WASTE APPROPRIATELY?

We support the concept of duty of care for individuals, with penalties set at an appropriate level and enforcement well resourced.

22. WHAT ELSE COULD WE DO SO THAT LITTER IS TAKEN MORE SERIOUSLY AS A FORM OF POLLUTION?

We strongly support the establishment of a national behaviour change strategy that implements a range of co-ordinated activities that effectively address the triggers and barriers of littering behaviour. This should include investment in consumer research, establishment of public access to well serviced "binrastructure", instilling a sense of community pride and responsibility - the empowerment of individuals to make a difference.

23. DO YOU SUPPORT A NATIONWIDE LICENSING REGIME FOR THE WASTE SECTOR?

Yes. Both Australia and the UK have found this to be useful in ensuring waste systems are properly monitored. Licensing must be at a national not local authority level to ensure consistency.

24. SHOULD THE NEW LEGISLATION INCLUDE A POWER TO REQUIRE A TRACING SYSTEM TO BE DEVELOPED FOR SOME OR ALL TYPES OF WASTE?

Yes. Tracing systems should be developed for hazardous waste and construction and demolition waste. The definition of the types of waste this covers needs to be specified in the strategy, not generalised as "other wastes of concern."



25. WHAT ASPECTS OF THE PROPOSALS FOR REGULATING THE WASTE SECTOR COULD BE EXTENDED TO APPLY TO HAZARDOUS WASTE?

Licensing of operators specifically under a hazardous waste regime.

Improving legislative support for product stewardship schemes

26. SHOULD THE NEW LEGISLATION KEEP AN OPTION FOR ACCREDITATION OF VOLUNTARY PRODUCT STEWARDSHIP SCHEMES?

Yes. This ensures a robust methodology and a pathway to improvement. There needs to be more uniformity of reporting requirements and clear KPIs to ensure equitable assessment of schemes performance.

This would help evidence whether regulation would enhance outcomes. There needs to be a clear path to moving a scheme to a regulated format if deemed necessary.

Regulation should set the targets, not specify the methodology of the solution.

27. HOW COULD THE ACCREDITATION PROCESS FOR NEW PRODUCT STEWARDSHIP SCHEMES BE STRENGTHENED?

See answer to 26.

Better and earlier engagement with business and industry to tap into existing industry knowledge about how to achieve targets.

If a voluntary scheme is consistently not meeting its KPIs as defined in its accreditation, then it should have the opportunity to seek a regulatory approach.

KPIs should, where possible, incorporate addressing the entire life cycle of a material and the waste hierarchy, not just focus on recovery rates.

If a material is having a significant impact on the waste stream (harm and or quantity) then it should be considered for regulatory intervention.

Schemes, whether voluntary or mandatory should have the ability to leverage existing systems and fund the full cost by setting appropriate fees.

Schemes should have the right to develop any funding structure they see appropriate for the material to cover scheme costs. E.g. levies, unit fees, deposit models, in order to meet scheme KPIs.

Scheme design must consider wider interested parties concerns in the development and delivery on social, economic, and environmental issues.

Must develop access to processing capacity equal to or greater than target collection volumes, with a bias toward NZ infrastructure.

The Ministry could appoint an independent body to assess and certify schemes against the criteria and to monitor their progress as feedback on the existing scheme is not structured or particularly useful.



28. HOW ELSE COULD WE IMPROVE THE REGULATORY FRAMEWORK FOR PRODUCT STEWARDSHIP?

The current process is cumbersome and slow moving. Stronger/clearer guidelines incorporating circular economy principles and best practice would help guide scheme design.

Industry can move faster than government to design cost effective schemes that meet government goals. Ministry could appoint account managers to work with schemes.

Product Stewardship schemes must be led by producers/industry and we do not support proposals for a government agency to be in charge of setting fees or appointing agencies to manage schemes.

We do support the principle of eco-modulation but this should come through the design process and not be pre-determined.

Enhancing regulatory tools to encourage change

29. WHAT IMPROVEMENTS COULD BE MADE TO THE EXISTING REGULATORY POWERS UNDER SECTION 23 OF THE WASTE MANAGEMENT ACT 2008?

Clear priorities needed for how products will be defined for mandatory schemes.

Industry and their expertise needs to be a pivotal part of this. We do not support government appointing agencies to manage schemes.

We support the principle of eco-modulation of fees to encourage more circular solutions or reduction of harm. Where they are appropriate, this should be part of the design process.

We do not support government agencies setting the fees. The scheme itself should be able to set the fee needed to meet the targets.

If government were to recover the costs of enforcement, a mechanism would be required to ensure this was done cost effectively.

There are some points under the heading of *Developing better legislative framework for deposit return schemes* that we feel should equally apply to all schemes, as they would greatly enhance effectiveness and reduce unnecessary layers of bureaucracy.

We agree there should be greater flexibility to set and update the appropriate scheme fees and/or levies (either through a gazette notice or by being devolved to the delivery body).

We support a broader range of tools to respond to scheme under-performance (such as target recovery rates not being met).

We agree the government should have more options than revoking the accreditation for underperforming schemes, especially under the voluntary model, where lack of data may be a contributing factor of underperformance.

The collection of good data is fundamental to success. Regulation supporting the collection of high-quality data at appropriate points in the supply chain is vital to the long term success of the strategy.



Factors such as recycled content of products within a scheme could make up part of scheme KPIs, ensuring a whole-of-life approach is considered by the scheme.

30. WHAT NEW REGULATORY POWERS FOR PRODUCTS AND MATERIALS WOULD BE USEFUL TO HELP AOTEAROA MOVE TOWARDS A CIRCULAR ECONOMY?

We do not support increasing regulations to control or prohibit disposal or sale of products and services without clarity about what factors would necessitate such controls.

31. WOULD YOU LIKE TO SEE A RIGHT TO RETURN PACKAGING TO THE RELEVANT BUSINESS?

From a glass perspective only, no.

Not on an ad hoc basis. This would be a major reverse logistics exercise, put further pressure on retailers in terms of space and be impractical to administer. However we support well organised refill programmes by individual businesses or groups of businesses. Some of our members are already doing this, e.g. Swappa Crate. We also ask why this question specifically targets “packaging”.

32. WOULD YOU LIKE TO SEE MORE LEGAL REQUIREMENTS TO SUPPORT PRODUCTS LASTING LONGER AND BEING ABLE TO BE REPAIRED?

The GPF supports addressing the rampant built-in obsolescence of large consumer goods, however the proposal needs to consider “who” and “what” determines a reasonable period for repair.

33. IS THERE A NEED TO STRENGTHEN OR MAKE BETTER USE OF IMPORT AND EXPORT CONTROLS TO SUPPORT WASTE MINIMISATION AND CIRCULAR ECONOMY GOALS? FOR EXAMPLE, SHOULD WE LOOK AT WAYS TO PROHIBIT EXPORTS OF MATERIALS LIKE LOW-VALUE PLASTICS?

No.

For regulations controlling or prohibiting disposal or sale of products and materials, there must also be reasonably practicable alternatives available – who determines what constitutes reasonable alternatives?

While we support the development of New Zealand-based infrastructure, we accept there may be circumstances where overseas markets may be necessary, or in some instances may be able to deliver superior outcomes (e.g. chemical recycling of plastics).

There should be traceability applied to all processed resources destined for overseas markets, and outcomes should also consider social development goals.



Ensuring the waste levy is used to best effect

34. WHAT TYPES OF ACTIVITIES SHOULD POTENTIALLY BE SUBJECT TO A LEVY? SHOULD THE LEVY BE ABLE TO BE IMPOSED ON FINAL DISPOSAL ACTIVITIES OTHER THAN LANDFILLS (SUCH AS WASTE TO ENERGY FACILITIES)?

Activities or facilities that enable linear disposal. e.g. disposal to land or waste to energy that are not part of a mandated product stewardship scheme. Linear disposal should be a last resort for any product.

35. WHAT FACTORS SHOULD BE CONSIDERED WHEN SETTING LEVY RATES?

It should be set high enough to be a disincentive to linear disposal and at a rate that will encourage innovation.

36. HOW COULD THE RULES ON COLLECTION AND PAYMENT OF THE WASTE LEVY BE IMPROVED?

No comment as this applies to recovery of fee from disposal sites

37. WHAT SHOULD WASTE LEVY REVENUE BE ABLE TO BE SPENT ON?

It should be allocated to infrastructure and other projects of strategic importance not as of right to councils.

Improvement of onshore processing capability and outcomes.

Scheme design and implementation costs for product stewardship schemes.

Key behaviour change programmes – e.g. recycling education, litter abatement.

The role of industry in effecting positive outcomes for glass is key. However, the burden falls largely with a single operator to provide a circular solution for glass packaging. The glass supply chain could be considered as fragile, with impacts being felt from Covid response, freight restrictions and increasing costs as well as the ever-present issue of contamination. As waste levy costs increase, the benefits of glass recycling are shared by a larger stakeholder group by the avoidance of disposal costs. The glass supply network would benefit from central investments to futureproof this existing onshore circular solution.

38. HOW SHOULD WASTE LEVY REVENUE BE ALLOCATED TO BEST REFLECT THE ROLES AND RESPONSIBILITIES OF THE DIFFERENT LAYERS OF GOVERNMENT IN RELATION TO WASTE, AND TO MAXIMISE EFFECTIVENESS?

We do not believe the split of the waste levy 50/50 to councils should remain in the long term as the ability of councils to influence change (especially higher up the waste hierarchy) is limited. Money should be allocated to prioritise enabling innovation to reduce waste, and infrastructure to further circular solutions.



39. HOW SHOULD WASTE LEVY REVENUE BE ALLOCATED BETWEEN TERRITORIAL AUTHORITIES?

We recognise councils play a key part in delivering services. This is currently allocated on a per capita basis, which disadvantages areas of seasonal influx. This could be allocated on a base rate based on population, but with the ability to bolster infrastructure in areas that face seasonal fluctuations. i.e. West Coast, Queenstown, Coromandel.

Improving compliance, monitoring and enforcement

40. WHICH ELEMENTS OF COMPLIANCE, MONITORING AND ENFORCEMENT SHOULD BE THE RESPONSIBILITY OF WHICH PARTS OF GOVERNMENT (CENTRAL GOVERNMENT, REGIONAL COUNCILS, TERRITORIAL AUTHORITIES) UNDER NEW WASTE LEGISLATION?

As prescribed earlier the operational aspects of the strategy should remain outside of MFE, e.g. the EPA or MBIE. This question has taken a singular negative enforcement and punishment approach. While enforcement must be part of the Act, the document fails to reflect a desire for positive change through proactive management (e.g. Auditing and lead reporting).

41. THE NEED FOR ENFORCEMENT WORK WILL INCREASE UNDER THE NEW LEGISLATION. HOW SHOULD IT BE FUNDED?

- Monitoring of compliance for mandatory product stewardship schemes should be internalised by each scheme.
- Moneys from increased fines and penalties should fund compliance.
- A percentage of the waste levy should be allocated for compliance.

42. WHAT EXPANDED INVESTIGATION POWERS, OFFENCES AND PENALTIES DO YOU THINK SHOULD BE INCLUDED IN NEW WASTE LEGISLATION?

No comment

43. WHAT REGULATORY OR OTHER CHANGES DO YOU THINK WOULD HELP BETTER MANAGE INAPPROPRIATE DISPOSAL OF MATERIALS (THAT IS, LITTERING AND FLY-TIPPING)?

Increased education about and enforcement of littering regulations, supported by a national strategy and campaign.

Businesses who fly tip should be subject to penalties commensurate with the offending at a level that makes it an unattractive risk.