

Submission by



The Glass Packaging Forum

to the

Ministry for the Environment

on the

Proposed amendments to waste legislation

The Glass Packaging Forum's submission on proposals to amend the Waste Minimisation Act 2008 (WMA) and Litter Act 1979 (the Litter Act)

Date: 1 June 2025

About The Glass Packaging Forum

The Glass Packaging Forum (GPF) is Aotearoa New Zealand's voluntary product stewardship scheme for glass bottles and jars. The Glass Packaging Forum sits under the umbrella of the Packaging Forum.

The GPF was established in 2006 to address supply chain concerns. The scheme facilitates stakeholder relationships to improve glass outcomes and offers expertise, information and funding to positively change behaviour.

Membership is on a voluntary basis. The scheme works across central government, local government, the recycling industry, producers, and end markets. The scheme is funded through a levy paid by members on the tonnage of glass to market. To date the scheme has contributed over \$4.5million to improving glass recycling outcomes.

The GPF has a goal of zero glass packaging to landfill. In 2022 the GPF commissioned independent work to design an [Extended Producer Responsibility](#) model for all glass packaging (not limited to beverage bottles). The GPF believes the report provides a template for a glass focused EPR that stands to significantly increase glass recovery to a predicted 90% (well beyond the current 70% recovery (if regulated)).

Therefore, the GPF strongly supports amendments to the Waste Act 2008 that would enable this transition to occur.

General comments

As the GPF sits under the umbrella of the Packaging Forum, we support the majority of the Packaging Forum's submission with a few exceptions. As such we recommend that both submissions should be read in tandem. The GPF submission provides feedback on questions 1,2,3,4,6 and 23 only. Variances relate to the GPF's experience as a voluntary scheme and our inherent understanding of the glass supply network and the required evolution needed to increase glass recovery rates.

In general, the GPF supports the Government's intent, to create fit-for-purpose, modern waste legislation that provides options and flexibility to reduce and manage waste effectively and efficiently. These amendments are travelling in the right direction and represent a critical opportunity to modernise our waste and litter legislation, clarify roles and responsibilities, strengthen regulatory tools, and support a more circular, low-waste economy.

The GPF is very supportive of progressing product stewardship via EPR and believe that we need to be moving faster in this area.

Consultation questions

Waste Minimisation Act Part 2: Product Stewardship EPR framework

1. Do you support the proposal for a modern EPR framework?

The GPF **supports the concept of a modern EPR framework in principle**. We believe the proposal has the potential to make it simpler to implement regulated product stewardship schemes in New Zealand. This would in turn shift the dial on resource efficiency and waste reduction. An EPR framework to improve glass recovery rates needs to include:

- Industry-led scheme design with reference to all stakeholders
- The ability for scheme costs to be shared transparently in the supply chain
- The ability to mandate data gathering at appropriate points by government agencies and/or the PRO in order to enable sizing of the current state and measure progress against targets
- Consideration needs to be given to how to fund scheme design of regulated products, and how the start of a scheme's operations will be funded
- Ability to delegate authority to the appropriate body for collection of producer responsibility fees (and re-funds where necessary), backed up with strong enforcement capability

- A fit for purpose compliance, monitoring and enforcement regime with clear roles for government, PROs and scheme management, as well as suitable penalties for non-compliance
- To the extent possible, schemes must be able to act nimbly, without the need for cabinet oversight for minor changes to scheme operations

2. Do you support discontinuing the government accreditation of voluntary product stewardship schemes?

The GPF has been an accredited scheme since 2010. An application for reaccreditation was submitted to the Ministry for the Environment (MfE) in September 2024. The prestige once accorded to voluntary accreditation has lessened over recent years and with the recent resizing of MfE, the agency's ability to administer voluntary schemes is questionable.

From a GPF perspective, the scheme enjoys strong support from members that produce the majority of glass to market, however under the voluntary model there are limitations to achieving whole of supply chain support. This essentially means there are brands that enjoy all the benefits of the scheme without participating or providing financial support. As a voluntary scheme responsible for an estimated 250,000 tonnes of glass, The GPF has been calling for a regulated EPR scheme since November 2022.

A mandatory, well-regulated EPR system for glass would be a more effective and equitable approach to ensuring producers take responsibility for the full lifecycle of their products. However, the GPF does recognise the benefit of the voluntary approach in providing a transitional pathway for products/industries wishing to begin the stewardship journey.

The GPF does not support the discontinuation of voluntary product stewardship schemes at this time.

Waste Minimisation Act Part 3: Waste disposal levy Distribution of the waste levy funds

3. Do you support changing the distribution of levy funds to territorial authorities from a population-based calculation to a combination of a base flat rate (20 per cent) and a population-based calculation (80 per cent)?

The scheme has seen firsthand examples of where significant seasonal influx of visitors can place significant pressure on recycling infrastructure and services. The scheme has provided funding to areas such as Queenstown, Central Otago, The West Coast, Kaipara, Thames Coromandel, Kaikoura and others to improve seasonal glass flows.

Many smaller councils lack the rates base to adequately fund waste minimisation initiatives and invest in the necessary infrastructure. Introducing a base flat rate component would improve equity in the distribution of levy funds, ensuring that all territorial authorities—regardless of size—have a fair opportunity to meet their waste minimisation obligations and contribute to regional and national outcomes.

The GPF supports the retention of a 50% share of levy revenue to local government and the introduction of a flat rate for the reasons highlighted above. This should not be an indefinite funding source and stringent controls must be applied. The introduction of EPR schemes will move the cost burden to producers and the automatic allocation to councils must be reassessed regularly (as set in the regulatory framework).

Scope of use of levy funds

4. Please indicate your support for changes that would permit territorial authorities to use the levy for:

- activities that promote or achieve waste minimisation, in accordance with and as set out in the territorial authorities' Waste Management and Minimisation Plan.* - **Support**
- costs associated with managing emergency waste.* - **Support**
- activities that provide for the remediation of contaminated sites and vulnerable landfills.* – **Does not support**
- compliance, monitoring and enforcement of mismanaged waste.* - **Support**
- activities that reduce environmental harm or increase environmental benefits.* **Support**

It is vital to ensure a funding model that avoids over-reliance on the levy and support more sustainable, long-term waste minimisation outcomes. The GPF Supports levy funding for activities aligned with territorial authorities' Waste Management and Minimisation Plans (WMMPs) ensuring that funding is targeted, strategic, and locally relevant. The GPF supports the use of levy funds to manage emergency waste.

The GPF provided funding to Hawkes Bay Councils to assist with glass recovery and increased transportation costs post Cyclone Gabrielle.

Given the contestable nature of the levy, there should be careful thought about the balance between levy funding and other funding sources, such as rates or partnerships.

The phrasing around remediation of contaminated sites (point C above) is incredibly loose and allows for use of levy funds for activities which are not consistent with the waste minimisation act objectives and would allow the funds to be used for non-landfill sites, or contaminated land. As evidenced by the Fox River Landfill washout in 2019, clean up and remediation requires significant investment.

6. *Do you support removal of the current blanket exclusion from the levy for waste-to-energy facilities?*

Unsure as not all waste-to-energy plants will use the same feedstock or yield the same outcome. It is important to carefully consider the waste hierarchy and focus on processes that yield environmental benefits i.e. does not compete for recyclable material, allows for the avoidance of coal or the generation of bio gas.

23. *Do you support enabling regulations for the collection of data on littering and dumping?*

Yes, the GPF recognises the need for a central and uniformed litter and illegal dumping data set. This view is reinforced by the use of questionable littering data that formed a foundational argument for the development of a Container Return Scheme and supporting Regulatory Impact Statement. A fragmented approach to litter data does not emphasise the need for change or serve to address the issue through positive behaviour change.

END