

WASTE ADVISORY BOARD
THREE YEAR STRATEGIC PLAN
2024-2026

1. Our Purpose and Strategic Priorities

The Waste Advisory Board (Board) was created by the Waste Minimisation Act 2008, to provide independent advice on waste issues to the Minister for the Environment (Minister).

The Board has been closely involved in many waste-related issues in recent years, working in partnership with the Ministry for the Environment (MfE). In particular, involvement with reviews of the effectiveness of the waste disposal levy, single use plastic bags and legislative and policy related issues has enabled the Board to develop a clear view of the current “road blocks” to making real progress on waste minimisation in New Zealand.

The Board is keen to take up the Minister’s invitation to provide “thought leadership” on waste issues, with particular focus on matters that could be beneficially addressed by national strategies and/or intervention. Our overall purpose is therefore to:

- Provide thought leadership.
- Provide considered and useful independent advice for the Minister
- Be pro-active on investigation and assessment of emerging issues.

We will continue to provide advice to the Minister using our approach to date which is based on:

- Collaboration, with all interested parties, without compromising confidentiality.
- Advocating for a te ao Māori approach to waste minimisation based on Tiriti Māori Crown partnership Innovative thinking that focuses on both opportunities and risk management.
- Practical and realistic recommendations that can be actioned.
- Challenging the status quo and advocating for systemic change.
- Evidence based conclusions.

2. Our Three-Year Plan – What we will deliver over the three years

- Clear, timely and concise advice to the Minister on all issues referred to the Board by the Minister
- Recommendations to the Minister as they arise from work on the issues in the Strategic Plan, or new issues where the Board is of the view that their input could be of assistance to the Minister.
- An Annual Report on matters considered by the Board and its progress against this Strategic Plan for each calendar year by end of March.

3. Our Resourcing

- Minimum of six meetings per year to address the Work Programme.
- The Board will work within the budget provided by the Minister for Board activities.
- Board members will utilise their own contacts and networks to assist them with their input to Board deliberations.

- The Board will work closely with the Ministry's Systems Change and Investment, Waste Investment and Regulatory and Policy Departments.

4. Report and review

- Strategic Plan provided to the Minister, or a newly appointed Minister for approval within first year of a new government's three-year term of office.
- An annual meeting with the Minister.
- Review of terms of reference within first year of new government's three-year term of office.
- This plan will be reviewed and updated annually as part of the Annual Report preparation work.

5. Our Strategic Priorities

Our three strategic priorities for 2023 to 2025 are:

- A just transition to a Circular Economy.
- Advocating for all of government solutions.
- Climate Change solutions that reflect multiple well beings.

Circular Economy

The Board recognises that the waste issues in Aotearoa New Zealand, and overseas, are largely caused by economies that support linear consumption patterns, colonisation and a paradigm that favours profits over environmental and social wellbeing. These systemic causes need to be addressed before waste issues will be resolved. The Board's advice to the Minister will therefore be based on circular economy thinking to tackle 'upstream' product design, manufacture and use issues in addition to 'downstream' disposal issues. A just transition to a circular economy has the potential to generate significant opportunities and benefits for Aotearoa New Zealand

All of government solutions

The Board recognises that the most effective way forward for waste is an all of government approach and will provide advice to the Minister on how this can be achieved, for each of the matters being considered.

Climate Change Solutions

The Government has signalled a climate emergency and developed a regulatory framework and structures for responding to climate change. The Emissions reduction and adaptation plans have been developed, targets set and current and future emissions budgets developed. The Boards advice will be based on holistic evaluation of climate initiatives taking into account:

- All parts of the life cycle. i.e. the production, use, consumption and disposal of materials across product and service sectors;
- interconnections between climate, waste, people and natural environmental health

OUR DETAILED WORK PROGRAMME FOR 2024-2026

Our work plan can be grouped into four main areas.

1. National strategies and/or interventions

- a. Whole of Government approach to waste minimisation.
- b. New Zealand's Transition to Circular Economy.
- c. Emissions reduction and adaptation.

2. Regulated frameworks

- a. Potential Amendments to the WMA and revision of the New Zealand Waste Strategy.
- b. How and when to drive a consistent national approach with regulatory tools.

3. Enabling actions

- a. Product Stewardship.
- b. Education, skills development and cultural change.
- c. Waste Disposal Levy and Waste Minimisation Fund Usage.

4. Targeted waste streams

- a. Food/organic waste.
- b. Hazardous Waste and Hazardous Substance Management and Disposal.

Detailed descriptions of each of these Priority Areas is given below.

1. Priority Area – Whole of Government approach to waste minimisation

The Board considers that there is a lack of coordination between government departments which is hindering waste minimisation and the transition to a low emission circular economy.

Key issues to be considered:

- How best to achieve a whole of government approach addressing consumption, funding through the WMF and other funds.
- Improving procurement principles/models.
- A greater integrated solution for waste.
- How best to avoid investing in infrastructure that deals with yesterday's problems rather than providing tomorrow's solutions.
- The value of a body or agency to provide an integrating function between policy making and implementation. This is a gap that has been identified by many different parties. Incl. Previous WAB advice and the working group on the waste strategy development.

2. Priority Area – New Zealand's Transition to Circular Economy

To make the transition to a circular economy we need to shift up the waste hierarchy and apply circular economy principles. Redesigning business models and products can reduce both waste and GHG emissions. It can also provide opportunities for business to develop innovative solutions and models to service this new paradigm.

The Board will consider a number of key opportunities.

The Waste Hierarchy

The Waste Hierarchy underpins decision making and investment. The WMA contains a description of the Hierarchy s44 which is being used as a guide by Local Authorities in developing their WMMP's. It would be useful if this was updated, expanded to include organics, definitions and priority order agreed so that it can become a universal tool for policy makers, businesses and the wider public.

Issues for consideration:

- Can a standard version be created and incorporated in the legislation to clarify definitions and priority order so that it can become a universal tool for policy makers, businesses and the wider public.
- How can organics be better integrated?
- What can we learn from overseas e.g., Preparation for reuse in the UK and Europe?
- How could this be communicated widely within and outside of Government to ensure consistency across legislation/regulation, policy and action?
- How could the waste hierarchy be used to avoid maladaptation and false solutions?

Reuse Economy

Reuse is one of the most effective ways to reduce the amount of waste we produce and shift us away from the current single use paradigm in which we live.

There are good examples of reuse systems in place, but we need significantly more. The Board will consider how New Zealand can best establish and support a reuse culture and practise throughout the country.

Key issues to consider:

- How to incentivise the adoption of current successful reuse/refill systems?
- How to establish and support a reuse culture and practises across Aotearoa?
- What are the current barriers, how best to identify and overcome them for business to business as well as business to consumer and who is best placed to do this.
- How policy instruments can be used to drive change e.g. mechanisms to support a shift to refillables.
- How economic instruments could support a shift away from consumption of single use items.
- What kinds of infrastructure would be required to enable a shift to refillables/reusable containers.

Durability and Repairability

Today's disposable society has led to a proliferation of products that have short lifespans due to inbuilt obsolescence and poor quality and reliability. This increases the amount of waste that is produced and encourages non- sustainable consumption patterns.

Whilst product stewardship can provide an ambulance at the bottom of the cliff to manage the unwanted products it does not always lead to a reduction in consumption patterns and an improvement in the quality of products sold. The Board considers that there is merit in investigating tools that could increase the quality and lifespan of products sold within NZ. This would include considering the following:

- What tools could be used to increase the quality and lifespan of products sold in NZ?

- Right to repair regulations that ensure replacement parts are readily and affordably available to consumers.
- How could right to repair regulations be used to ensure replacement parts are readily available and affordable to consumers?
- What changes would need to be made in legislation and regulation to ensure minimum expected lifespan for specific product types?
- Expansion of consumer legislation around “product quality/fit for purpose” be expanded to include businesses as well as individual consumers?

3. Priority Area – Emissions reduction and adaptation

Reducing greenhouse gas emissions and adapting to climate change are emerging policy drivers for the waste sector. Current work in this space uses production-based accounting to identify priorities and develop Greenhouse Gas Inventory reports and Nationally Determined Contributions.

This approach focuses on emissions generated by production sectors within Aotearoa. This framing limits consideration of ‘waste’ emissions to biogenic methane from organics going into landfills. It does not include emissions relating to imported food and goods or reflect the way emissions are generated across supply chains that flow through multiple sectors.

As a result, *Chapter 15 - Waste* of the 2022 Emissions Reduction Plan. (ERP) Emissions does not include proposed actions to minimise both carbon emissions and waste right across product life cycles from extraction to disposal. Multiple opportunities exist to influence emissions in the production and consumption system. Applying the waste hierarchy priorities and circular economy principles in the context of planetary limits enables emissions reduction, adaptation and generates broader benefits.

Key issues for consideration:

- How does action across the waste hierarchy help us adapt to climate change?
- Can the Stats NZ consumption emissions reporting be used in a way to assist waste reduction.
- Would it be useful to create a circularity index that connects material flows with emissions to identify ‘hot spots’ to focus on. e.g. Textiles - Scotland.
- What can we learn from other sectors? e.g. The ERP building and construction chapter recognises the importance of consumption emissions.
- Would changing how supply chain emission reduction opportunities are measured improve our ability to target wasteful high emission practices?
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4. Priority Area - Product Stewardship

The Board recognises the progress that product stewardship has recently made but considers this is just a first step in a much larger programme of initiatives. It is of the view that the product stewardship aspects of the WMA could play a greater part in waste minimisation for specific problem waste streams. It also considers that it is worthwhile looking into how product stewardship could effect change for a broader range of products outside of those specified as Priority Products

Key issues for consideration

- How could product stewardship and economic instruments be used to drive the transition to circular models? Lessons from overseas?
- What would be the benefits and costs of expanding product stewardship requirements to all products on the market regardless of whether they have been declared a priority product or not.
- How do we work with producers so that they only bring to the market products that have their life cycle fully planned out and paid for?
- How can we develop product stewardship scheme development policy that follows the waste hierarchy and goes beyond just recycling at end of life?
- Whether multiple individual schemes or combined national schemes for multiple products is the best approach for product stewardship in New Zealand
- What determines the success of a scheme?
- How the implementation of schemes can be accelerated and what benefits/risks this could deliver.
- What economic instruments could be used by central and local authorities to support product stewardship.

5. Priority Area - Education, skills development and cultural change

Mindset shift and behaviour change are critical to enable Aotearoa to make the jump from a linear extractive economy to a circular regenerative one. Investing in human and social capital is key, because it is people that create policy, run systems, organise action and do the practical work that brings the circular economy to life.

This includes:

- Awareness raising and information sharing - campaigns and education.
- Engaging and supporting people so they take action - willing to participate and pay
- Practical skills and knowledge - education, training and professional development

New Zealanders are increasingly committed to living more sustainable lifestyles.

People are rekindling old skills, and strengthening new ones e.g. growing kai, compost, collaborating, design, systems change, reverse logistics, repair and recycling. Skills and knowledge are just as important as the hard physical assets and systems they sit alongside.

Investment is required to resource capability and capacity building so people have the skills and knowledge they need to make the necessary changes at home and at work. Councils and businesses are struggling to find suitably skilled staff. Countries like Scotland have already started to consider [employment and skills pathways for a circular economy](https://www.zerowastescotland.org.uk/content/future-work).¹

Key Issues for consideration

- What is the best balance between national coordination and local scale delivery?
- How can organisations working at the local scale, with connections into their communities, be supported to deliver culturally appropriate training and education?

¹ <https://www.zerowastescotland.org.uk/content/future-work>

- How can we integrate the waste hierarchy and circular economy into primary, secondary, tertiary and vocational education curricula and the reform of the New Zealand Vocational Training system?
- How can we use Te Tiriti principles and mātauranga māori to underpin the frameworks, programmes and resources, create specific Te Reo content, attract and develop Māori educators?
- What would help to bring people into the circular sector, offer them career paths and professional development so we can retain them?
- How can we build on people's increasing commitment to living more sustainably to connect waste reduction activities with emissions reduction and adaptation?

6. Priority Area – Waste to Energy including incineration

There has been an increase in waste to energy proposals around the country. Council officers, Mayors and Councillors, Consultants, communities and Māori entities are being approached by people and organisations proposing to use various forms of Waste to Energy technologies. A number of proposals that are currently on the table aim to use mixed solid waste as feedstock for incinerators.

This is a complex issue that covers a broad range of wastes and applications. There is limited guidance for local and regional decision makers and the current RMA does not support consideration of circular economy or climate change impacts of proposals. Current practice for assessing the risks associated with the operation of the technologies and the disposal or use of any by-products is inadequate and does not provide sufficient safeguards.

Key issues to be considered:

- Whether there is adequate guidance for local and regional council decision makers to make informed decisions on waste to energy applications
- Whether waste to energy options inhibit or assist New Zealand's transition to a low waste, low emissions circular economy.
- Implications of new RMA legislation and increased focus on climate impacts
- What are the lessons from overseas jurisdictions regarding impacts, costs, benefits, policy and investment approaches?
- Are there significant risks to human and ecosystem health – are assessment and standards frameworks adequate? Do they provide sufficient safeguards?
- Whether there is a need for a moratorium on new waste to energy facilities while sound decision making frameworks and processes are established and impacts and consequences worked through?

7. Priority Area – Waste Disposal Levy and Waste Minimisation Fund Usage

There has been recent progress on the expansion and increase of the Waste Disposal Levy. This is starting to have an effect. The Board is interested on what effect this change is having and whether further improvements and or increases/decreases in the levy are required. Therefore, the Board will continue to have a watching brief on the Waste Disposal Levy and the impact it is having on reducing waste.

Given the recent increases in the Waste Minimisation Fund from the current and future expansion of the Waste Disposal Levy the Board wishes to consider how this funding is distributed and how effective this distribution is on achieving a low waste low emission New Zealand.

Key issues for consideration will be:

- Whether funding has been distributed in a fair and effective manner and whether there are funding gaps that should be addressed.
- How effective the levy (and signalling its future increase) has been/is at changing behaviour and delivering a circular low emission New Zealand.
- Whether the Board should provide advice on strategic priorities and funding objectives.
- What the costs and benefits are in understanding the long-term impacts of funded projects, who is best placed to report on this and how it should be funded.
- The Board will also consider how the WMF money gets used, including OPEX issues as well as CAPEX.
- How the WDL money is spent by Territorial Authorities (TA) and whether/how it furthers the aims of a transition to a low waste economy.
- Given the recent increase in available funding, it is worth considering whether the current distribution of funding is still applicable and is the most effective way to promote waste minimisation within NZ.
- TAs voluntarily send annual reports to the Ministry of how the fund money is spent. The Board wants to consider whether there needs to be improvements in the way this data is reported and whether the reports should be publicly available.

8. Priority Area –Potential Amendments to the WMA and revision of the New Zealand Waste Strategy.

Changes have been proposed for both the WMA and the New Zealand Waste Strategy. These pieces of work have yet to be completed and therefore the Board will continue to maintain its interest in the development, completion and implementation of this vital work.

The WMA is over 10 years old, and it has been raised by many within the Waste Sector that there are potential amendments that could be made to improve the Act's ability to reduce waste. The WMA is very much focussed on the waste sector – with the expansion of the levy the regulations do not adequately provide clarity for other sectors under the Act and regs. It needs to be made fit for future and adaptive to meet future waste minimisation objectives.

Key issues for consideration:

- How the WMA could be optimised to create effective change over the Government's legislative framework.
- How a Crown-Māori Tiriti based partnership could be included in the WMA
- How definitions within the current WMA could be improved or amended to assist in our goal of a low waste New Zealand. For example, "waste"," household waste", "disposal", "re-use", "recycling", "minimising", "managing", and "inert".
- Improving the definition of waste, and other related definitions, in the WMA may help resolve the levy leakage issue. If there was universal understanding/acceptance of definitions, exemptions may not be required.

- Whether a standard version of the Waste Hierarchy would reduce confusion, provide a common framework and assist the country's waste minimisation objectives.

What new definitions should be included in the WMA or its supporting regulations and whether they would improve understanding, reduce levy leakage, and fairness of application. Whether improving the definitions would also assist in incentivising environmentally sound, efficient and economical reuse of material, again meeting the purpose of the WMA.

9. Priority Area – How and when to drive a consistent national approach with regulatory tools

New Zealand has a legacy of inconsistencies and a wide variety of ways to manage waste and unwanted products and materials. This has been recognised and steps are being taken to address this for kerbside recycling and other initiatives.

The Board considers there are sometimes good reasons to have a nationally consistent approach and other times a local approach can be more effective.

This Priority Area will consider what issues are best addressed at a national level rather than being left to individual councils to monitor and control and whether this would be best achieved through regulations, mandatory standards or through national policy initiatives.

Three examples of areas that will be considered are given below, these are just examples and there may be others that require consideration in the future.

National Standardisation for Disposal of Waste into Land

Given the changes to the Waste Disposal Levy and the facilities that are now required to participate, the Board is keen to look at how best to standardise this area to ensure a nationally consistent level playing field. National Environmental Standards (NES) for waste have been considered to be an effective way to achieve this and the Board considers this is still a priority area.

Key issues for consideration will be:

- Whether developing a national standard would help to reduce the level of waste disposal levy (levy) avoidance.
- A key problem is that of Class 3 landfills accepting waste outside of scope. The Board will consider how classifications can be made mandatory.
- How best to target inconsistencies across NZ for how different waste streams are handled, and what is permitted or consented in each region. Guidelines exist for cleanfills and landfills, but as they are voluntary and not all facilities follow them, and councils apply them inconsistently.
- Whether minimum standards are required for disposal of waste to land to avoid environmental harm.
- Whether a consistent framework would put in place the necessary foundation to give effect to the New Zealand Waste Strategy and the Waste Minimisation Act.
- The Board would consider what the Minister needs to do to make this happen.

Waste Data

The Board will consider what needs to happen next to address waste data issues. There are two distinct issues: the lack of data obtained from non-levied disposal facilities, and the lack of data available from the wider waste sector “upstream” of disposal.

We will consider the requirements for gathering not just waste disposal data, but also at waste generation data, to get a bigger picture view of the multiple pathways in the waste stream.

Key issues for consideration will be:

- How the Government can move towards a suitable system that will enable companies to provide data without risk of competitor issues.
- What is required to maximise participation in accurate data collection?
- How to minimise the potential financial burdens that would be placed on data holders.
- What the data should be used for and therefore what data are required.
- How best to ensure the data, and the systems of its collection across the country, is consistent and universal.
- Where ownership of the collected data should sit and who should have access to it.
- How commercial sensitivities between industry players can be protected.

On farm waste disposal

The Ministry has a goal to develop a consistent framework for the disposal of waste by 2025. Farm dumps are not part of the current classification system, but the Ministry would consider incorporating them into a national framework. Farm dumps create emissions to land, water and air including Greenhouse gas emissions. There is a significant risk to the brand and reputation of the primary sector due to unmanaged disposal of mixed waste to land on farms.

Key issues for consideration:

- Mechanisms that could be used to bring farms into a formal waste management framework.
- Whether Environment Canterbury’s Non-Natural Farm Waste’ project should be carried out in all regions of NZ
- Whether there are wastes where on farm disposal is appropriate.
- What systems would be needed to assist the primary sector to divert its waste from on farm disposal
- What reduction/elimination/reuse options would benefit the primary sector to reduce its waste.

10. Priority Area – Food/organic waste

The current focus on methane emissions from landfill is driving attention, investment and policy towards diversion from landfill. Long term it is useful to consider the relationships between the food supply systems, local food resilience, soil health and water holding capacity and the methods for handling and processing organic material so that it can be returned to highest and best end use.

Along with a lack of onshore recycling infrastructure there is also a lack of facilities that can accept organic waste for beneficial use, particularly for food waste and other odoriferous wastes. Given the potential greenhouse gas implication of landfilling these wastes the Board considers this area should be investigated and recommendations made.

The Board will also consider the end use of the processed organic waste and whether this delivers the best value outcomes for New Zealand.

Key areas for consideration:

- How do we shift from waste minimisation and management to circular economy and waste prevention in the context of organic materials?
- How do we shift to a conversation about maximising value of product rather than maximising diversion from landfill
- What is the best strategic approach to organics infrastructure – for example what is the role for local-scale and community enterprise in medium to small scale operations?
- What would be the ongoing benefits of developing a circular economy for soils?
What is the relationship between organics handling, soil quality, food resilience and sustainability of the primary sector and how can it benefit organic waste reduction.
How would the development of an organic specific waste hierarchy benefit this Priority Area.
- Use of the waste hierarchy to focus on action and investment at the top of the hierarchy.
- The value of cross- sectoral value chain approaches that integrate thinking about the food supply chain from production to composting e.g. work by WRAP in the UK

11. Priority Area – Hazardous Waste and Hazardous Substance Management and Disposal.

The Board is concerned about the few proactive controls on the management of hazardous waste. There are many examples of hazardous wastes being abandoned and left to local councils/communities to pay for appropriate treatment and disposal. This issue has been recognised and improvements have been proposed in the revised WMA. As this has yet to come into effect the Board will continue to have a watching brief on this critical issue and will provide advice on improvements that it considers are necessary.

Disposal of hazardous substance to land and water is an increasing risk. This is having an impact on the amount of soil being disposed of in landfill as well as long term pollution issues.

Key issues for consideration:

- Measures that could be taken to ensure:
 - Only suitably qualified individuals can collect and dispose of hazardous waste.
 - Licencing of facilities/companies.
 - Cradle to grave tracking of hazardous waste.
- Measures to address this such as Duty of care provisions have been signalled in the WMA update, board will maintain a watching brief.
- What other proactive controls are required?
- What is the relationship between landfill acceptance criteria, problem waste streams and emerging contaminants?
- What can be learned from other jurisdictions regarding the scale and nature of problems and potential solutions?