



## PROACTIVE RELEASE COVERSHEET

<b>Minister</b>	Minister Penny Simmonds and Minister Nicola Grigg	<b>Portfolio</b>	Environment
<b>Name of package</b>	Advice on policy options for organic waste emissions reduction	<b>Date to be published</b>	12 June 2026

### List of documents that have been proactively released

<b>Date</b>	<b>Title</b>	<b>Author</b>
14 August 2025	BRF-6163: Options to reduce emissions from organic waste	Briar Wyatt
4 December 2025	BRF-6828: Progressing organic waste emissions reduction policies and initiatives	Briar Wyatt
19 March 2026	26-BRF-00032: Implementing landfill gas management actions in the second emissions reduction plan	Briar Wyatt
23 April 2026	BRF-00169: Biogas and other policy options to reduce emissions from organic waste	Ashleigh Mansbridge
25 May 2026	26-BRF-00994: Agreement to release landfill gas reduction and organic waste sector feedback document and supporting advice for targeted engagement	Jiqiao Shi

#### **Information redacted YES**

Any information redacted in this document is redacted in accordance with the Ministry for the Environment's policy on proactive release and is labelled with the reason for redaction. This may include information that would be redacted if this information was requested under Official Information Act 1982. Where this is the case, the reasons for withholding information are listed below. Where information has been withheld, no public interest has been identified that would outweigh the reasons for withholding it.

#### **Summary of reasons for redaction**

Some information has been withheld from *26-BRF-00994: Agreement to release landfill gas reduction and organic waste sector feedback document and supporting advice for targeted engagement* and *BRF-00169: Biogas and other policy options to reduce emissions from organic waste* under Section 9(2)(b) and Section 9(2)(f)(iv) of the Official Information Act as these are commercially sensitive and under active consideration at the time of release.



## Briefing: Options to reduce emissions from organic waste

Date submitted: 14 August 2025

Tracking number: BRF-6163

Security level: In-Confidence

Actions sought from Ministers		
Name and position	Action sought	Response by
To Hon Penny SIMMONDS Minister for the Environment	Respond to recommendations and discuss with officials (if required)	23 August 2025

Actions for Minister's office staff
<p>Once Minister Simmonds has made decisions on which policies she would like to progress, forward this briefing to:</p> <ul style="list-style-type: none"> <li>Hon Simon WATTS [Climate Change, Energy and Local Government] and</li> <li>Hon Nicola WILLIS [Economic Growth] should the Government procurement action be progressed</li> </ul> <p>Return the signed briefing to the Ministry for the Environment (<a href="mailto:advice@mfe.govt.nz">advice@mfe.govt.nz</a>).</p>

Appendices and attachments
<ul style="list-style-type: none"> <li>Appendix 1 - Indicative cost benefit analysis and implementation considerations for abatement policy options</li> </ul>

Key contacts at Ministry for the Environment			
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Minister's comments

# Options to reduce emissions from organic waste

## Key messages

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1. Improving organic waste disposal and landfill gas (LFG) capture to reduce emissions from waste is a key action in the second emissions reduction plan (ERP2) for the waste sector.
2. Through ERP2 the Government has committed to a projected emissions abatement of 0.8Mt CO<sub>2</sub>-e during EB2 from organic waste or landfill gas policy related actions, in addition to separate abatement from investment by the Waste Minimisation Fund (WMF).
3. While biogenic methane emissions from the waste sector have been largely trending downward, further reductions will be needed to support meeting EB2, subsequent emissions budgets and New Zealand's 2050 methane targets.
4. As committed to in ERP2, officials have worked with the sector to identify feasible and meaningful emissions abatement opportunities. We have identified a range of levers that align with the credible markets pillar of the Government's Climate Change Strategy and focus on the New Zealand Emissions Trading Scheme (NZ ETS) as the key initial tool for reducing emissions under ERP2. The ETS levers are expected to contribute 0.1 Mt abatement in EB2. This leaves a gap of 0.7 Mt.
5. To support achieving the projected abatement, officials have also presented additional policy measures that increase certainty beyond the NZ ETS measures. These are categorised by their alignment with the Government's NZ ETS led Climate Change Strategy:
  - i Improving the efficiency and operation of the NZ ETS;
  - ii Expanding the ETS obligations;
  - iii Increasing the coverage and efficiency of landfill gas capture systems; and
  - iv Reducing organic waste and increasing recovery rates. Data and evidence improvement levers are also presented; these are not categorised as they underpin the policy levers.
6. The categories above align with the opportunities officials have identified across the waste system, which can improve the outcomes of our existing regulatory framework and support further biogenic methane reductions from organic waste.
7. The proposals presented cannot all be added up to a total abatement estimate. Some of them are alternative ways to address the same or similar waste streams and outcomes. These each come with their own trade-offs, costs and benefits, and public consultation will help to ascertain which to progress. You will be provided further advice on packages following consultation.
8. In line with the ERP2 action, we are also considering how to improve the solid waste data and evidence base to better reflect the sector's emissions profile. Officials are

proposing this is achieved by collecting more accurate waste composition data and expanding the sites we receive data from.

9. We are seeking your agreement on the options you would like to progress to public consultation, to take place before the end of 2025. There is a requirement to consult on some of the policy proposals outlined in this briefing as they propose regulatory change.

## Recommendations

We recommend you:

- a. **agree** to officials undertaking further policy development on the following levers:

Policy lever	Interim projected abatement	Decision
<b>1. Improving the effectiveness of the NZ ETS for the waste sector</b>		
Updating the existing default emissions factor (DEF) in the Climate Change (Waste) Regulations 2010 Improves the accuracy in reported emissions and associated obligations	EB2: 0.1 Mt EB3: 0.4 Mt	Yes   No
Linking emissions factors to tiers of evidence provided by operators Incentivises increased LFG collection efficiency		Yes   No
<b>2. Expanding the ETS obligations</b>		
Require broader classes of disposal facilities, and resource recovery facilities, to participate in the NZ ETS Incentivises meaningful engagement in the NZ ETS	Emissions abatement to be modelled if option progressed.	Yes   No
<b>3. Increasing the coverage and efficiency of landfill gas capture systems</b>		
Introducing requirements for specific organic construction and demolition waste streams (timber, paper and textile organic products) to be disposed of at landfill sites with LFG capture	EB2: 0.07 Mt; EB3: 0.3 Mt	Yes   No
Amend the National Environmental Standard for Air Quality (NES-AQ) to best achieve high efficiency landfill gas capture at appropriate sites	EB2: 0.7 Mt; EB3: 1.8 Mt	Yes   No
Requiring all class 1 landfills to introduce LFG capture	EB 2: 0.1 Mt; EB 3: 0.3 Mt	Yes   No

Requiring all landfills where methane is detected to introduce LFG capture	EB 2: 0.3 Mt; EB3: 0.5 Mt	Yes   No
<b>4. Reducing organic waste and increasing recovery rates</b>		
Funding to support complementary food waste reduction, diversion and education efforts	Emissions abatement to be modelled if option progressed – Depends on the scale of funding available; supports feedstock for biogas production.	Yes   No
Working with territorial authorities to improve management of organic materials (food and garden waste)	EB2: 0.08 – 0.1 Mt; EB3: 0.2 Mt	Yes   No
Requiring businesses that produce large quantities of food waste (such as supermarkets and food production) to recover food waste rather than sending to landfill (where diversion opportunities are available)	EB2: 0.05 Mt; EB3: 0.1 Mt This action could become feedstock for biogas production.	Yes   No
Waste minimisation plans as a requirement of Government procurement (particularly for infrastructure)	Emissions abatement to be modelled with MBIE if option progressed	Yes   No
Policy to support biogas production Incentivises innovation relating to biogas and organic waste recovery	Emissions abatement to be modelled if option progressed	Yes   No
Reduce methane generation from windrow composting, such as by introduction of standards describing best practice.	Emissions abatement to be modelled if option progressed	Yes   No
<b>Improving the quality of organic waste data and reporting</b>		
Updating waste composition data and methodologies	N/A	Yes   No
Improving our understanding of farm fills	N/A	Yes   No
Improving our understanding of organic diversion infrastructure needs	N/A	Yes   No

c. **agree** to meet with officials to discuss the contents of this briefing.

Yes | No

- d. **agree** to forward this briefing to Minister Watts as the Minister for Climate Change, Energy and Local Government, and to the Minister of Economic Growth, Hon. Nicola Willis, if you choose to progress options from their portfolios to public consultation.

Yes | No

## Signatures

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Glenn Wigley  
General Manager – Waste &  
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**Climate Change  
Mitigation and Resource  
Efficiency**

**14 August 2025**

Hon Penny SIMMONDS  
**Minister for the  
Environment**

**[Date]**

# Options to reduce emissions from organic waste

## Purpose

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1. This briefing:
  - i provides initial advice on options to reduce emissions from organic waste across the waste system in line with the action outlined in the second emissions reduction plan (ERP2).
  - ii seeks your direction on the options you want officials to progress to public consultation

## Background

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2. The waste sector contributes 3.8 per cent of New Zealand's greenhouse gas emissions, and 7.4 per cent of biogenic methane emissions.
3. While the sector's emissions have been tracking downward since 1990, further reductions are needed to support the achievement of New Zealand's international and domestic emissions reduction targets.
4. A significant proportion of New Zealand's organic waste is sent to landfill. An estimated 42.7 per cent of the waste disposed of to Class 1 landfills, and 52 per cent of the waste disposed of to Class 2 facilities, is made up of organic waste. There is an opportunity to reduce the amount of organic waste sent to landfill and improve the efficiency and coverage of our landfill gas capture systems.

### **The Government has committed to reducing emissions from organic waste by a projected 0.8Mt in the second emissions budget (EB2)**

5. In the second emissions reduction plan the Government committed to working with the sector to investigate ways of improving organic waste disposal and landfill gas capture, contributing 0.8 MT CO<sub>2</sub>-e of abatement to EB2.
6. This briefing is focused on progressing the organic waste and landfill gas capture action (paragraph 13b). The proposals presented are expected to complement or benefit the WMF projects which is also an action within the ERP2.

### **Reducing emissions from organic waste is aligned with the Government's Climate Change Strategy**

7. ERP2 is anchored in the five pillars of the Government's Climate Strategy for delivering on New Zealand's climate goals. The first three pillars of the strategy are most relevant to the waste sector:
  - i Infrastructure is resilient and communities are well prepared
  - ii Credible markets support the climate transition

- iii Clean energy is abundant and affordable.

### **There is an existing regulatory framework to manage emissions for waste**

- 8. There is an existing regulatory framework which manages waste emissions in New Zealand and has led to emission reductions. The framework includes:
  - i **Biogenic waste emissions are included in the NZ ETS:** Since 2013 landfills that dispose of more than 1000 tonnes per year<sup>1</sup> are required to report and surrender obligations via the NZ ETS. This is regulated via the Climate Change (Waste) Regulations 2010 and the Climate Change (Unique Emissions Factor) Regulations 2009 which contain requirements for the measurement and calculation of methane emissions.
  - ii **Landfills over a certain threshold are required to install landfill gas capture systems:** Since 2004, certain landfills have been required to operate LFG capture systems. The National Environmental Standard – Air Quality 2004 (NES-AQ) sets:
    - a) A threshold capacity of 1 million tonnes at which a landfill must control their greenhouse gas emissions (Regulation 25)
  - iii A capacity and putrescible waste content threshold (5 per cent or more putrescible or biodegradable waste) at which point a site over 1 million tonnes must install LFG capture (Regulation 25)
  - iv An efficiency threshold that states a landfill gas capture system cannot allow emissions exceeding 5000 ppm of methane (Regulation 26).

## **Analysis and advice**

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### **We are seeking your direction on the levers to develop further and take to public consultation**

- 9. Officials are seeking your direction on which levers to develop further ahead of public consultation. We have identified a range of opportunities across the waste system, which can improve the outcomes of our existing regulatory framework and support further biogenic methane reductions from organic waste. These opportunities are categorised by their alignment with the Government's NZ ETS led Climate Change Strategy:
  - i **Improving the effectiveness of the NZ ETS for the waste sector** – This approach aligns with the Government's Climate Change Strategy utilising the ETS as the key climate change tool. It involves the more efficient operation of the current regulatory

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<sup>1</sup> The Climate Change (General Exemptions) Order 2009 states that obligations do not apply to landfills that have been in operation since before 1 January 2012, and either:

- Dispose of less than 1000 tonnes of waste per year and are located at least 150km away from the nearest modern landfill by land; or
- Dispose of less than 500 tonnes of waste per year and are located at least 75km away from the nearest modern landfill by land; or
- Are located at least 25km away from the mainland for offshore island.

settings and allowing the price signal to change behaviour. It is likely to increase administrative costs and some landfills ETS obligations, which could create a stronger incentive to reduce emissions.

- ii **Expanding the NZ ETS obligations** - This approach aligns with the Government's Climate Change Strategy. Expanding the coverage of the NZ ETS will increase the coverage of biogenic methane emissions in the scheme and therefore extend the incentive to reduce these emissions. This approach would see additional landfills facing NZ ETS obligations, increasing the cost to the sector.
  - iii **Increasing the coverage and efficiency of LFG capture** –This approach is less aligned with the NZ ETS climate led approach and the strategy. It is a more interventionist approach, but it would have more of a direct effect on emissions. Costs for this approach would depend on whether the changes require sites that were previously exempt from regulations, to equip landfill gas capture. Estimates vary on cost per site. A comprehensive new landfill gas capture and destruction project in Queenstown (including retrofitting the existing landfill) cost \$7.8 million in 2021<sup>2</sup>. Use of the Waste Minimisation Fund to assist with costs could be considered.
  - iv **Reducing organic waste and increasing recovery rates** – Levers could be considered which target the source of organic waste. This approach does not align with the NZ ETS led approach but enables a systems approach to be undertaken. Options for increasing resource recovery require a combination of infrastructure, services and education and behaviour change support to ensure these options are used. The actions presented in this lever are thus dependent on the WMF action to invest in organic infrastructure.
10. Progressing the ETS focused options is expected to achieve 0.1 Mt of abatement, leaving a gap of 0.7 Mt. Progressing policy levers which are less aligned to your climate strategy, alongside the NZ ETS improvements will increase the likelihood of achieving the projected abatement committed to in ERP2.
11. Levers which Improving the quality of organic waste data and reporting are also outlined below. These underpin the categories outlined above and would support a NZ ETS led approach.
12. Indicative emissions abatement estimates are provided for the levers where available. It is important to note the interconnectedness of most levers, as those with apparently no or minimal emissions abatement support the abatement of other levers.
13. An indicative cost benefit analysis (CBA), with notes on implementation pathways for all options, is included in Appendix 1. The CBA does not include costing estimates; this would be undertaken as part of further policy development.

### **1. Improving the effectiveness of the NZ ETS for the waste sector**

14. Officials propose we improve the NZ ETS to incentivise further waste emissions reductions. This aligns with the Government's Climate Strategy and is aimed at

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<sup>2</sup> <https://www.qldc.govt.nz/2021/june-2021/21-06-21-victoria-flats-landfill-upgrade-complete/>

improving sector uptake of opportunities to reduce NZ ETS obligations. If you support the inclusion of improvements to the NZ ETS for waste, officials propose you engage with the Minister for Climate Change to seek his agreement to progress this work as the Minister responsible for the scheme.

15. **Updating the existing default emissions factor (DEF) in the Climate Change (Waste) Regulations 2010:** The Waste Regulations use data from landfills around the country to determine a national average composition to include in calculations of emissions. Updating this composition figure using more recently acquired composition data will improve the accuracy in reported emissions and associated obligations under the NZ ETS. As composition data availability increases, officials recommend further consideration of changes to the DEF, including the potential of having several defaults based on (for example) landfill size, location/rainfall zone, or by activity category. Work on this could be prioritised, enabling an early improvement while more complex solutions are designed and implemented. The NZ ETS settings for 2025 are progressing through Cabinet. Officials recommend that this option is progressed as a discrete amendment in advance of the 2026 NZ ETS settings, at which point the subsequent actions are recommended to be included.
16. **Linking emissions factors to tiers of evidence provided by operators:** This would give operators participating in the NZ ETS a choice about the emissions factor that applies for calculating their surrender obligations by deciding the level of evidence they provide. This will provide operators with the opportunity to report recovery rates of up to 100 per cent if they submit the required supporting evidence, removing the current 90 per cent capture limit, which the sector has argued penalises high-performing gas capture systems. An indicative example of how this could look is outlined in Table 1 below. Adopting a tiered approach could reduce emissions by 0.1 Mt in EB2 and 0.4 Mt in EB3.

**Table 1:** Indicative example of tiers and evidence required to achieve these for Unique Emissions Factor regulations

Who?	Emissions factor	Evidence required
Sites without LFG who do not want to submit supporting evidence	Compositional DEF	None
Sites with LFG who do not want to submit supporting evidence	Compositional DEF and 20 per cent default recovery rate	None
Sites without landfill gas capture	Section 23B (Unique Emissions Factor regulations) calculation for UEF	At least 2 composition surveys annually Survey plan Evidence of verification
Sites with landfill gas capture who want to claim	Section 23D (Unique Emissions Factor)	As above, plus: Estimated efficiency of LFG collection and destruction

recovery rates between 20 per cent and 60 per cent	regulations) calculation for UEF	system as outlined in Section 23C(1)
Sites with landfill gas capture claiming recovery rates higher than the national median or 60 per cent	Section 23D (Unique Emissions Factor regulations) calculation for UEF	As above, plus:  Seasonal composition surveys for full previous calendar year (4 total)  Estimated history of waste composition for FOD decay model

**2. Expanding the NZ ETS obligations**

**17. Requiring broader classes of disposal facility to participate in the NZ ETS:**

Stakeholders in the informal advisory group (paragraph 35iv) suggest that one of the key disincentives for meaningful engagement in the NZ ETS is the fact that only a subset of Class 1 facility operators are currently participating. This means they pay more to the Government than other disposal facilities, in combination with a higher levy fee than other classes. The current wording of the legislation is ambiguous, with Schedule 3 Part 6 (Waste Regulations) indicating that any disposal facility operator is obligated to participate, and the interpretation of disposal facility in the CCRA interpretation section is unaligned with the definitions of facilities under the Waste (Calculation and Payment of Waste Disposal Levy) Regulations 2009. Officials propose expanding participation in the NZ ETS is tested in public consultation, and that wording is subsequently clarified to align with policy intent across relevant legislation and regulations.

**Increasing the coverage and efficiency of LFG capture**

**18. Introducing requirements for organic construction and demolition waste streams (timber, paper and textile organic products) to be disposed of at disposal facilities with LFG capture:**

Approximately 69 per cent of waste disposed of across all levied sites (Class 1-4) is construction and demolition material<sup>3</sup>. Diverting those with an organic component to sites with LFG capture could abate 65kt (0.07Mt) in EB2 and 350kt (0.3Mt) in EB3. There are other options (outlined in Appendix 1) to explore, which could achieve up to 50kt (0.05Mt) of abatement in EB2 and 491kt (0.5Mt) in EB3.

**19. Amend the National Environmental Standard for Air Quality (NES-AQ) to best achieve high efficiency landfill gas capture at appropriate sites:**

This would have two phases. The first would be introducing standards defining “high efficiency” for existing LFG systems without affecting coverage, which could achieve 0.7 Mt in EB2, 1.8 Mt in EB3 if introduced in 2026. Following this, officials recommend an evaluation of emissions in 2028 with two potential approaches to extending coverage if further certainty is needed to meet targets<sup>4</sup>:

<sup>3</sup> Beca (29 October 2024) NZ Construction and Demolition Waste Baseline & Tracking Methodology Report (Final report) Prepared for the Ministry for the Environment Manatū Mō Te Taiao.

<sup>4</sup> If the incentive/ETS based approach recommended does not have emissions abatement impact or projected impact by the 2028 review, regulations could be made to require landfill gas capture at sites that have not adopted the practice.

- i requiring all class 1 landfills to introduce LFG capture (modelled to achieve 0.1 Mt abatement in EB2, 0.3 Mt in EB3; or
- ii requiring all landfills where methane is detected to introduce LFG capture (modelled to achieve 0.3 Mt abatement in EB2, 0.5 Mt in EB3

### **Reducing organic waste and increasing recovery rates**

**20. Funding to support complementary food waste reduction, recovery and education efforts:** This would focus investment into initiatives to reduce the generation of organic waste, and processes and education opportunities that contribute to increasing uptake of diversion infrastructure and services. This could be funded by waste levy revenue separate from the \$30 million hypothecated for the WMF (this would likely require Treasury support). The initiatives that would be funded under this action support the abatement potential of diversion infrastructure and projects, such as biogas production. The abatement potential of this depends on the scale of funding available. Officials propose that potential continued or new partnerships are assessed against the following prioritisation criteria to identify the highest potential abatement opportunities to continue:

- i Impact on food waste reduction
- ii Scalability and sustainability
- iii Evidence and evaluation plan
- iv Strategic alignment to ERP2 goals
- v Partnerships and co-investment

**21. Territorial authority management of organic materials (food and garden waste):** The Government has previously opted not to progress mandatory kerbside collections for food scraps [BRF-4819 and CAB-483 refers]. Kerbside collection of organic materials has an estimated emissions abatement potential of up to 106kt (0.1mt) in EB2, 271kt (0.2mt) in EB3, abatement potentials which could expand when combined with the development of processing infrastructure, and behaviour change and education programmes to increase uptake of services. Officials can provide you with further advice on potential pathways to support kerbside collection and outline the associated benefits if requested. An early (non-exhaustive) indication of the options that this advice could include are:

- i Increasing the proportion of funding required for councils to apply for Waste Minimisation Fund support for kerbside collections, from the fixed package of funding to a reduced proportion based on the size of the council.
- ii Facilitating regional or national operations contracts to reduce cost pressures on smaller councils in the ongoing operation of services.
- iii Incentivising the recovery of materials at anaerobic digestion or other organic resource recovery facilities, including through funding to reduce gate fee costs. Increasing this feedstock could also help to deliver on biological waste to energy actions committed to by Minister Watts.

**22. Requiring businesses that produce large quantities of food waste (such as supermarkets and food production) to recover food waste rather than sending to**

**landfill (where diversion opportunities are available):** This option has been introduced internationally with success. It is estimated to achieve 50kt (0.05mt) of abatement in EB2, and 136kt (0.1mt) in EB3. This assumes a 50 per cent reduction in commercial and industrial food waste to landfill, which could be increased as resource recovery infrastructure comes online in reasonable proximity to the sources of waste. This may also act as an incentive for resource recovery operators to expand across the country, which would help to address the considerable waste and resource recovery infrastructure deficit highlighted by Te Waihanga<sup>5</sup>.

23. **Waste minimisation plans as a requirement of Government infrastructure procurement:** Ministry officials previously advised against stopping the ERP1 action to require waste minimisation plans under the Building Act. This option provides an alternative pathway for encouraging these plans. Government procurement is a key lever that can be used to influence and provide signals of policy directly to the market and could be used to target high emissions waste streams such as organic C&D materials and food (loss or waste). It can also help to create end markets for sustainable products and foster expectations for market behaviour. The Government has recently displayed the influence that Government procurement holds through the decision to require wool carpets in Kainga Ora homes to help support the wool industry. This suggested update to the Procurement rules in 2025<sup>6</sup> would require agencies to consider the environmental benefit of proposed solutions to New Zealand. Waste minimisation plans could be included as an amendment to current whole-of-life best practice guidance for construction procurement<sup>7</sup> to give effect to this consideration.
24. **Biogas production:** Minister Watts has directed MfE and the Ministry of Business Innovation and Employment (MBIE) to progress work on biogas. Organic material currently being sent to landfill could in some cases support biogas production instead. Early engagement with gas stakeholders has highlighted opportunities such as signalling anaerobic digestion as a preferred recovery technology and producing best practice guidance at a national level to support territorial authority decision making around recovery. Blending biomethane with other gases for residential supply is identified by the Gas Infrastructure Future Working Group as an option to reduce the risk of price increases for energy for consumers<sup>8</sup>. Although the direction from Minister Watts could be delivered through closer collaboration on Waste Minimisation Funding, officials believe there is merit in considering complementary policy options to help foster and support innovation relating to biogas.
25. **Improved standards for aeration of windrow composting:** This option is key to the abatement projected for the Waste Minimisation Fund in the 2025 projections. Composting operations produce methane, which means to achieve abatement rather than an increase in EB2, requirements to minimise these emissions through active aeration of static piles and windrows should be considered.

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<sup>5</sup> <https://tewaihanga.govt.nz/our-work/research-insights/sector-state-of-play-resource-recovery-and-waste>

<sup>6</sup> [Proposed Government Procurement Rules: Responsible expenditure of public funds](#)

<sup>7</sup> [Whole-of-life - Construction procurement](#)

<sup>8</sup> Page 21, NZ Gas Infrastructure Future Working Group, Gas Transition Analysis Paper

### **Improving the quality of organic waste data and reporting**

26. The 2025 inventory indicates the overall data uncertainty for solid waste disposal is +/-80 per cent<sup>9</sup>. This undermines emissions reporting and the development, assessment and enforcement of effective policy. The proposed actions would enable more accurate emissions estimation, align data and models used across Government, and contribute to a consistent and transparent evidence base for regulatory decisions. A cost benefit analysis for the data improvement measures is in Appendix 2.
27. Some changes are already being progressed. The Minister for Climate Change has agreed to progress amendments to the Climate Change Response Act (CCRA) to improve data sharing between the Environmental Protection Authority (EPA) and MfE [BRF-6321 refers]. This will ensure continuous exchange of LFG capture data, reported CO<sub>2</sub>e and surrenders, and any waste composition data used in applications for UEFs, to ensure consistency across agencies and improve the evidence base for some policy development.
28. **Updating waste composition data and methodologies:** Accurate waste composition data is critical to estimating gas capture and emissions from landfills. Officials recommend:
- i updating the Solid Waste Analysis Protocol 2002 (SWAP) to reflect modern sampling methodologies and ensure statistically robust results.
  - ii developing a national survey protocol to provide representative composition surveys across Class 1 disposal facilities, requiring regular national surveys every five years.
  - iii conducting representative one-off composition surveys for Class 2 and Class 5 landfills.
29. **Improving our understanding of farm fills:** Farm fills remain a major data gap in New Zealand's waste sector<sup>10</sup>. To address this, officials recommend an initial survey of regional councils on their knowledge of prevalence, location, management practices and impact of farm fills and of open burning; their compliance and monitoring practices; and local infrastructure availability and likely waste streams. Using findings from the above survey, the Government may then choose to collaborate with the sector and universities to address these data needs.
30. **Improving our understanding of organic resource recovery infrastructure needs:** Officials propose improved data collection for anaerobic digestion (AD) and composting facilities by:
- i. introducing a mandatory reporting scheme for organic materials processed at AD and composting sites, including tonnage and (where relevant) gas production volumes. This is already a requirement for resource recovery facilities operated by

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<sup>9</sup> This was 86 per cent in the previous NZ GHG inventory, with 140 per cent uncertainty from unmanaged landfills (C2-C5 and farm fills). The new inventory updates unmanaged landfills (C2-C5) down to 90 per cent, farm fills still 140 per cent), therefore uncertainty has reduced overall to 80 per cent.

<sup>10</sup> +/- 140 per cent data uncertainty

a territorial authority, so this would expand these requirements to include private operators; or

- i introducing a voluntary reporting scheme for materials flowing into anaerobic digestion (AD) and composting facilities.

## Consultation and engagement

31. The ERP2 action committed to working with the sector to further investigate how we dispose of and manage organic waste.
32. Formal consultation on the overarching policy objectives for this project took place twice: for ERP1 (October - November 2021) and for ERP2 (July – August 2024) [BRF-5156 refers summary of submissions]. Further consultation is recommended on specific proposals designed to address these objectives.
33. Data requests and surveys from the Ministry to landfill operators in May 2023 and July 2024 informed subsequent engagement by Eunomia Consulting Ltd with the sector in late 2024.
34. Two targeted sector workshops on landfill gas capture and organic waste management options for reducing emissions have been held in 2025:
  - i The first of these invited stakeholders from across the system – landfill operators, territorial authorities, advocacy groups and resource recovery operators – to discuss a long list of policy options and hear from them on the benefits and difficulties of implementing these.
  - ii The second was held with members of the Waste and Recycling Industry Forum and focused on the technical details behind some of the policy proposals – particularly those relating to LFG capture and the NZ ETS.
35. The establishment of an informal advisory group to test options and clarify barriers to implementation. The goal of this group is to continue engaging across the sector throughout the policy cycle to ensure policies are feasible and fair. Additional members have been accepted to the group following interest in this work programme at the WasteMINZ conference in June 2025.

### Officials recommend undertaking consultation

36. Several of the proposed levers will require regulatory changes and therefore public consultation will be required.
37. In addition to this there is consistent public interest in waste policy – in 2022, 50 per cent of New Zealanders were worried about the impacts of waste, while 30 per cent felt the Government was not doing enough to address these impacts<sup>11</sup>. In that survey, waste was ranked as the second most important challenge facing New Zealand over the next 20 years, behind reducing poverty<sup>12</sup>. 88 per cent of New Zealanders identified food

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<sup>11</sup> <https://environment.govt.nz/facts-and-science/science-and-data/understanding-new-zealanders-attitudes-to-the-environment/>

<sup>12</sup> <https://environment.govt.nz/facts-and-science/science-and-data/understanding-new-zealanders-attitudes-to-the-environment/>

waste as an important issue, and 83 per cent were worried about the impact of waste on the environment in 2023<sup>13</sup>.

38. Public consultation is an opportunity to recognise New Zealanders' significant interest in waste while providing education on the reality of addressing climate change through waste sector actions.

## Te Tiriti analysis

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### *Te Tiriti o Waitangi settlements*

39. Several Treaty settlements refer to waste related subject matters:

- i Ngāti Kahungunu ki Wairarapa Tāmaki nui-a-rua identifies “waste management” as a possible topic of interest for annual meeting agendas.
- ii The Ministry committed to a workshop with Parihaka Papakāinga Trust on the Waste Minimisation Fund and to facilitate a workshop between Parihaka Papakāinga Trust and the Taranaki waste management network.
- iii Raukawa and Te Arawa under their respective Waikato River accords both identify “waste management and minimisation” as a topic of interest for greater information sharing between them and the Ministry.

### *Broader Māori interest in organic waste management*

40. The interconnectedness of systems highlights how ineffective management of waste can have impacts on Māori interests in climate, biodiversity, land, freshwater and coastal marine environments.

41. The following iwi and hapū groups have identified an interest in waste issues:

- i The Maketu Iwi Collective (Te Rūnanga o Ngāti Whakaeue ki Maketū, Whakaeue Marae Trustees and Ngāti Pīkiao Noho ki Tai) see a Maketu Circular Economy project as a priority action for achieving community security and self-sufficiency<sup>14</sup>.
- ii Te Arawa identify Circular Enterprise and Economies as a Priority Kaupapa, with metrics that include whānau, hapū and iwi having control over their sustainable food and resource systems, which form circular economies at local marae and community level<sup>15</sup>.
- iii Ngāti Whātua previously opposed the development of what would be the largest landfill in the country in Tāmaki Makaurau. They say “the impacts of the [...]

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<sup>13</sup> [Research into attitudes to waste and recycling | Ministry for the Environment](#)

<sup>14</sup> <https://maketu-runanga.iwi.nz/assets/He%20Toka%20Tu%20Moana%20Maketu%20Climate%20change%20Adaption.pdf> page 11

<sup>15</sup> <https://tearawa.io/wp-content/uploads/2021/09/RS03642-Ta-Arawa-Climate-Change-Strategy.pdf> page 11

proposal on the whenua, wāhi tapu, puna and waterways, along with the huge risks posed to Kaipara Moana are totally unacceptable”<sup>16</sup>.

- iv Ngāi Tahu, Te Arawa Trust and the Māori-led waste minimisation organisation Para Kore have previously requested further engagement and involvement in policy development processes.

## Next steps

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- 42. Officials propose we meet with you to discuss and get your direction on the proposals outlined in this briefing.
- 43. In line with the direction you provide, officials will:
  - i Undertake further detailed policy development, including a full cost benefit analysis and modelling emissions abatement.
  - ii Once the above further analysis has been completed provide you with a draft consultation document and draft Cabinet paper seeking approval to initiate public consultation

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<sup>16</sup> <https://ngatiwhatua.iwi.nz/what-we-do/kaitiakitanga/hua-land-based-activities/>



## BRIEFING

### Progressing organic waste emissions reduction policies and initiatives

<b>Date:</b>	4 December 2025	<b>Priority:</b>	Routine
<b>Security classification:</b>	In Confidence	<b>Tracking number:</b>	BRF-6828

Action sought		
	Action sought	Response by
Hon Penny Simmonds <b>Minister for the Environment</b>	<b>Respond</b> to recommendations and discuss with officials (if required) <b>Forward to</b> Hon Simon Watts, Minister of Climate Change and Minister Bishop, Minister of Resource Management Reform	11 December 2025

Contact for telephone discussion (if required)			
Name	Position	Telephone	1st contact
Kara Lok	Acting General Manager – Waste and HSNO Policy	022 303 5283	✓
Brittany Rymer	Acting Manager – Waste Sectors Policy	020 4082 9612	

The following departments/agencies have been consulted

- Minister's office to complete:
- |  |   |                                    |
|--|---|------------------------------------|
| <input type="checkbox"/> Noted               | <input type="checkbox"/> Approved             | <input type="checkbox"/> Declined  |
| <input type="checkbox"/> Overtaken by Events | <input type="checkbox"/> Needs change         | <input type="checkbox"/> Seen      |
|  | <input type="checkbox"/> See Minister's Notes | <input type="checkbox"/> Withdrawn |

#### Minister's Comments



## BRIEFING

### Progressing organic waste emissions reduction policies and initiatives

<b>Date:</b>	4 December 2025	<b>Priority:</b>	Routine
<b>Security classification:</b>	In Confidence	<b>Tracking number:</b>	BRF-6828

### Purpose

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1. This briefing outlines the plan for providing further detailed advice on policy levers to deliver on waste emissions abatement targets and seeks your in-principle agreement to the proposed consultation approach from April 2026.
2. It also seeks approval to exclude requirements for landfill gas capture to be equipped at all sites where methane is detected from public consultation.

### Key points

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3. Through the second emissions reduction plan (ERP2), the Government has committed to a projected emissions abatement of 0.8Mt CO<sub>2</sub>-e during the second emissions budget (EB2) from organic waste or landfill gas policy related actions, in addition to 1Mt CO<sub>2</sub>-e abatement from investment by the Waste Minimisation Fund (WMF).
4. We have undertaken further policy analysis across the areas you directed in August [BRF-6163 refers] and have identified several policy levers that appear most promising in terms of emissions abatement.
5. We recommend these be prepared for consultation in April 2026 (subject to your further agreement based on more detailed policy advice). We have also provided an update on other policy levers, and a proposal to discontinue policy development on one lever.
6. Abatement figures were last reviewed for emissions projections prior to BRF-6163. Updated figures will be provided in the two following briefings. Most of the abatement is anticipated to be achieved in the third emissions budget period (EB3), a change from ERP2 due to an agreed modelling change in July 2025.

### Proposed consultation/engagement approach

7. We propose a dual engagement approach which includes formal consultation through the 2026 New Zealand Emissions Trading Scheme (NZ ETS) annual regulatory review for NZ ETS-related options, and targeted engagement on other non-regulatory landfill gas and organic waste policies.
8. Options to be consulted on must meet the abatement goals for the waste sector from ERP2. As far as possible, options should be consistent with the Government's climate

strategy and other relevant priorities, particularly the Government's commitment to supporting the development of a domestic biogas market.

6. Some policy actions are highly aligned with the Government's NZ ETS-led climate change strategy, and officials propose these form the basis of formal consultation through the annual review of NZ ETS regulatory settings.
9. We are also proposing engagement on other policy levers, which align with the Government's Statement on Biogas by targeting access to consistent organic waste feedstocks with low contamination rates. At this stage, officials do not expect these levers to require regulatory changes and therefore, would not be subject to formal public consultation however sector engagement is still recommended.
10. Officials suggest continuing policy work on high-efficiency landfill gas capture standards while NZ ETS levers are progressed. This would include seeking feedback through engagement on the scale and potential impact of efficiency standards, without specifying a mechanism for implementation.

**We recommend ceasing policy development on one option**

11. We are seeking your agreement not to progress the following lever:
  - Requiring all landfills where methane is detected to introduce landfill gas capture.

**When you will receive further advice**

12. We are working towards undertaking public consultation from April 2026, aligned with timelines for the annual NZ ETS settings review consultation. To avoid consultation fatigue, officials from both programmes are working together to ensure a joined-up approach to consultation.
13. In February 2026 we will provide detailed advice on NZ ETS-related policy options ahead of the annual NZ ETS settings review consultation. In March 2026, we will provide advice on policy options to support biogas production and recovery of organic waste ahead of sector engagement.

## Recommended action

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The Ministry for the Environment recommends you:

1. **Agree** in-principle to progress a dual engagement approach which includes formal consultation through the NZ ETS annual regulatory review for NZ ETS-related options, and targeted engagement on other landfill and organic waste policies, with contents to be confirmed in two pursuant briefings. *Agree / Disagree*
2. **Agree** not to progress requirements to install landfill gas capture at all landfills where methane is detected *Agree / Disagree*
3. **Approve** the proposed phasing of further advice on the waste emissions reduction work programme *Approve / Not approve*
4. **Note** that decisions relating to the NZ ETS and associated regulations may require Minister Watts' approval in the February 2026 briefing *Noted*
5. **Forward** this briefing to Minister Watts (Minister of Climate Change, Minister for Energy) and Minister Bishop (Minister of Resource Management Reform) *Agree / Disagree*



Kara Lok  
**Acting General Manager, Waste and HSNO Policy**  
Ministry for the Environment

4 / 12 / 2025

Hon Penny Simmonds  
**Minister for the  
Environment**

\_\_\_ / \_\_\_ / 2025



## Background

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1. Through the ERP2, the Government has committed to a projected emissions abatement of 0.8Mt CO<sub>2</sub>-e during EB2 from organic waste or landfill gas policy related actions, in addition to separate abatement from investment by the WMF.
2. In August, you directed officials to progress development on options to reduce emissions from organic waste [BRF-6163 refers]. This includes policy options across the waste system:
  - overarching economic and regulatory settings (improvements to the effectiveness of the NZ ETS for the waste sector, expanding NZ ETS obligations)
  - managing the waste we produce and associated emissions (increasing the coverage and efficiency of landfill gas capture systems, reducing organic waste and increasing recovery rates, policy to support biogas production)
  - improving our understanding of system operations (improving the quality of organic waste data and reporting).
3. This briefing recommends priorities for further policy development and packages for public consultation and engagement.
4. The proposals in this briefing will deliver the following pillars of the Government's Climate strategy:
  - **credible markets support the climate transition:** key abatement opportunities in this package are delivered through proposals to expand and improve waste sector participation in the NZ ETS
  - **clean energy is abundant and affordable:** a shift in focus towards recovering renewable energy (biogas) from organic materials is aligned with New Zealand's Energy Package<sup>1</sup>, particularly Actions 1.3 ("Increase New Zealand's energy supply through government energy demand – Leveraging Government's purchasing power to drive new energy projects") and Action 1.4 ("Supercharge renewable energy")
  - **infrastructure is resilient and communities are well prepared:** waste infrastructure is recognised by councils and the sector as critical for community resilience, from being a key site for disaster recovery to the dual role many community sites play as a gathering and information hub. Proposals to strengthen the resilience of recovery infrastructure and the community sector contribute to this pillar
  - **world-leading climate innovation boosts the economy:** the Government can play an enabling role in advancing a thriving biogas sector by fostering industry collaboration and facilitating access to reliable feedstocks, helping create the right

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<sup>1</sup> [At a Glance: New Zealand's Energy Package](#) (Ministry for Business, Innovation and Employment, October 2025)

conditions for market-led innovation and growth. This also reflects commitments made by the Government Statement on Biogas in October 2025.

## Key considerations for selecting a package of options to consult on

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5. Officials have commenced policy development on the 14 options you agreed to progress in BRF-6163. This includes:
  - prioritising development of NZ ETS options and understanding what abatement is possible through those measures
  - considering what further abatement could be achieved through the use of resource management regulations, and
  - supportive measures to ensure the uptake of services and success of NZ ETS and efficiency standard measures.
6. The package of options to be consulted on must meet the abatement goals for the waste sector from ERP2. As far as possible, the options should be consistent with the Government's climate strategy and other relevant priorities, particularly the Government's commitment to supporting the development of a domestic biogas market.
7. Officials have evaluated the options and identified those to be consulted on based on the degree of sector support and their ability to:
  - deliver emissions abatement in line with the abatement goals in ERP2 (0.8Mt for EB2)
  - align with the Government's Climate Change Strategy and NZ ETS led approach
  - align with the Government's Biogas Statement and Energy Package
  - minimise costs to the sector and Government
  - minimise new regulatory requirements for the sector.
8. Abatement estimates will be updated for the February and March briefings, including additional information attained through policy development. The NZ ETS related levers were previously expected to achieve 0.1Mt within EB2, with the remaining abatement potentially able to be bridged with supportive measures. However, officials anticipate that abatement potential of NZ ETS actions will be more significant.
9. It is important to note that action across the system is required to ensure the success of infrastructure solutions, and that options with apparently no or minimal emissions support the abatement potential of others. Not all options presented are additive in terms of emissions abatement, and the dependencies will be outlined in following briefings.
10. As policy develops and we develop a better understanding of abatement impacts, you will need to consider how our options interact with the 2030 methane target and emissions budgets. New Zealand is currently projected to stay within the second emissions budget, but not to meet the 2030 methane target.

## **Proposed consultation approach**

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11. The actions outlined below are most aligned with the Government's NZ ETS led climate change strategy:
  - improve the default emissions factor (DEF) through national composition information (proposed for 2026 consultation)
  - improve the accuracy of unique emissions factors for waste sector participants (proposed for 2026 consultation)
  - broaden waste sector participation in the NZ ETS (for 2027 consultation).
12. Officials propose these options are consulted on through NZ ETS annual regulatory review consultations. They minimise the regulatory burden by prioritising the NZ ETS and providing choices to the sector in how they respond to changes.

### **Improving the default emissions factor through national composition information**

13. The DEF is set by the Government. Waste sector participants use it when calculating their obligations under the NZ ETS. It represents a national average using data from landfills around the country. Officials are progressing data collection and analysis to update the DEF.
14. We anticipate recommending an effective date of 1 January 2027 for the updated DEF, pending public consultation and final policy decisions.
15. By improving the DEF with more accurate waste composition information, calculated methane emissions will better reflect reality, reducing the risk of underestimating emissions and strengthening incentives for landfill operators to implement mitigation measures, which helps achieve abatement targets.

### **Improving the accuracy of unique emissions factors for waste sector participants**

16. This approach aims to ensure the standard of evidence required in unique emissions factor (UEF) applications is commensurate with the level of gas capture claimed.
17. It is possible that implementing this change would, at first, see an increase in reported emissions as reporting starts to capture emissions that had previously not been accurately accounted for. It is anticipated that over time, operators will engage in emissions abating behaviours to reduce the fiscal cost of surrender obligations.
18. Officials recommend this is included in the 2026 NZ ETS annual settings review consultation. We anticipate recommending an effective date of 1 January 2027 for the updated UEF approach.

## **Broadening waste sector participation in the NZ ETS**

19. Officials recommend updating the DEF and UEF before considering broadening the waste sector participation in the NZ ETS. This would reduce regulatory churn for new participants getting used to complex regulations and registration processes, as well as the burden on EPA staff in providing support to more participants with limited resources.
20. Options for broadening waste sector participation in the NZ ETS are proposed to be tested in-principle in planned targeted engagement on the landfill gas and organics policy options. Any regulatory decisions required would be later consulted on in the relevant annual ETS regulatory review.

## **Policies to support the production of valuable products from waste**

21. The Ministry for the Environment is working with MBIE on enabling a market-led approach to support the Government Statement on Biogas. This highlights the potential of anaerobic digestion and landfill gas capture [MBIE BRIEFING-REQ-0021083 refers]. It captures the following organic waste actions. These options are those you progressed in September, with updated language to reflect what we have learned through development to date.
22. Officials propose that feedback is sought on these options during the landfill gas and organics focused engagement from April 2026, which would run in parallel with the NZ ETS annual regulatory review consultation.

### ***Funding to incentivise action and drive uptake of resource recovery services***

*(Previously: Funding to support complementary food waste reduction, diversion and education efforts)*

23. There is an opportunity to deliver emissions reductions from organic waste by extending the work commenced through national food waste reduction partnerships<sup>2</sup> from 2022 – 2026. This is one of the options under consideration for utilisation of levy underspends, with further advice expected to be provided to you in the coming weeks [25-BRF-00019 refers].

### ***Support for territorial authorities to deliver high-quality, value-for-money kerbside services***

*(Previously: Working with territorial authorities to improve management of organic materials)*

24. Kerbside collection of organic materials has an estimated emissions abatement potential of up to 0.1Mt in EB2, 0.2Mt in EB3. This could expand when combined with the development of processing infrastructure and programmes targeting the uptake of services. Officials are considering options to support, but not require, kerbside collections to best access organic waste feedstocks for biogas production.

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<sup>2</sup> [National food waste reduction programmes | Ministry for the Environment](#)

25. You recently received advice on the first national baseline measure of food loss and waste (FLW) across the food supply chain [BRF-6909 refers]. These findings will inform further policy development.

***Facilitating options for businesses that produce large quantities of food waste to recover food waste where diversion opportunities are available***

*(Previously: Requiring businesses that produce large quantities of food waste to recover food waste rather than sending to landfill where diversion opportunities are available)*

26. This work includes supporting Gas NZ with the development of a biogas strategy and action plan, as directed by you and Minister Watts in September 2025. Ministry officials will review the draft strategy by the end of 2025.
27. Biogas applications such as anaerobic digestion fit within the current WMF investment signals [BRF-6810 refers], so no change is required to enable targeted investment in growing this sector at this stage.
28. Achieving a 50 percent reduction in commercial and industrial food waste to landfill could achieve 0.5Mt of abatement in EB2, and 136kt in EB3. This could be increased as resource recovery infrastructure comes online in reasonable proximity to sources of waste.

## **Update on other policy options**

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29. The below options involve considering how the National Environmental Standard for Air Quality (NES-AQ) regulations can be improved as they are transitioned into the new national standards system:
- regulated high efficiency standards, and what emissions or compliance threshold should trigger such requirements
  - requiring all Class 1 landfills to install landfill gas capture.
30. Implementation of these options is potentially reliant on timeframes for the transition of national environmental standards into the new Resource Management (RM) system. It is anticipated that the earliest implementation date possible for RM changes supporting landfill gas capture is in 2027. Officials are considering whether alternative existing tools are available through which these changes could be made, including NZ ETS and waste regulations.
31. By making NZ ETS changes first, we can see how the market reacts and decide the scale of intervention needed under national environmental standards.
32. Additionally, because they target the same emissions as changes to the UEF, it is recommended that to best align with the climate strategy, UEF changes are made first, with regulatory requirements introduced if the market-led approach is not effective.

## **Requirements for landfill gas capture**

***A stage-gate approach for regulating efficiency standards and extending LFG capture requirement to all class 1 landfills***

33. In line with your direction, we are proposing a stage-gate approach to progressing the efficiency standards and requiring all class 1 landfills to install LFG capture. This enables operators to make investment choices through the NZ ETS to reduce their emissions ahead of making changes via the RM system.
34. Proposals to refine the UEF target the same emissions as efficiency standards. Officials recommend assessing the effectiveness of the UEF changes before progressing further changes (stage 1). This is in part because the relevant replacement instruments for national environmental standards will not be introduced until 2027, and because the information that will be gained through the UEF approach will help to inform thresholds for high-efficiency standards.
35. Changes to the UEF are designed to incentivise operators to reduce their emissions to reduce costs by increasing the efficiency of LFG capture systems. This rewards high-abatement behaviours by reducing their NZ ETS costs.
36. In contrast, high efficiency standards would target the lowest performing landfills to bring their capture efficiencies up to a national median. Officials now believe, based on early policy development, that the UEF changes have more abatement potential within the climate strategy.
37. Officials propose continuing work on high-efficiency standards while NZ ETS levers are progressed. This includes seeking feedback through targeted engagement with the sector on the potential impact of efficiency standards, without specifying the mechanism for implementation, noting that broader changes to environmental standards remain dependent on RM reform.

### ***Ruling out requirements to install landfill gas capture where methane is detected***

38. Policy development to date has identified that access to methane detection technologies is limited by cost and local availability, and some options that were viable when policy development commenced (such as MethaneSAT<sup>3</sup>) are no longer active possibilities. The IPCC have also noted extant barriers to the efficacy of detecting landfill gas using surface and satellite methodologies.
39. Officials are therefore proposing that requirements to install landfill gas capture at all landfills where methane is detected are not progressed. This could be an option in future when the necessary technology is widely available in New Zealand and would not introduce significant up-front costs for operators.

## **Update on waste data improvements**

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40. The data improvements you directed officials to progress in BRF-6163 are underway, with legislative amendments to the Climate Change Response Act already approved by Cabinet to ease data sharing between the Environmental Protection Authority (EPA) and the Ministry. We will provide an update on this work in future briefings.

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<sup>3</sup> <https://www.mbie.govt.nz/about/news/methanesat-update-july-2025>

41. Many in the sector have told us that the Solid Waste Analysis Protocol 2002 (SWAP) is not entirely fit-for-purpose for affordable and accurate data collection. It is important that this is addressed as waste composition will be key evidence input for above-average UEF tiers. A review of the SWAP, and legislative references to it, is being completed as part of business-as-usual but is likely to require additional business resourcing in the 2026/27 financial year.

## **Sequencing of further advice and public consultation**

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### **Further policy advice**

42. Officials will provide policy advice in two further briefings:
- in February 2026, on NZ ETS options for the waste sector and interactions with high-efficiency standards under national direction, to yourself, the Minister of Climate Change and Minister for Resource Management Reform
  - in March 2026, on levers which align with the Government's Statement on Biogas, by targeting access to consistent organic waste feedstocks with low contamination rates.
43. In addition to receiving the above briefings, the Minister of Climate Change will continue to monitor progress of waste emissions abatement policies through the Climate Priorities Ministers Group and Cabinet.

### **Public consultation**

44. Officials propose the options are consulted on through a combination of formal regulatory consultation and informal targeted engagement processes from April 2026.
45. The waste related NZ ETS changes are proposed to be included in the 2026 NZ ETS annual regulatory review consultation overseen by Minister Watts. This would include:
- improving the default emissions factor (DEF) through national composition information
  - improving the accuracy of unique emissions factors for waste sector participants
46. The option to broaden waste sector participation in the NZ ETS would then be consulted on through the 2027 ETS regulatory review process, following 2026 DEF and UEF updates.
47. The wider waste actions will be engaged on via a landfill gas capture and organic waste focused discussion document ('white paper') distributed to waste sector participants. This would likely include:
- standards for efficiency and the types and levels of evidence required to assess these
  - an appropriate threshold at which the Minister should consider introducing a regulatory approach

- supportive measures that ensure organic waste materials are recovered or disposed in the highest-value manner
- policies to support a market-led approach to biogas

48. The sequencing of the work programme and the public consultation is outlined in Appendix 1.

## **Next steps**

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49. Officials propose we meet with you to discuss this briefing if required.

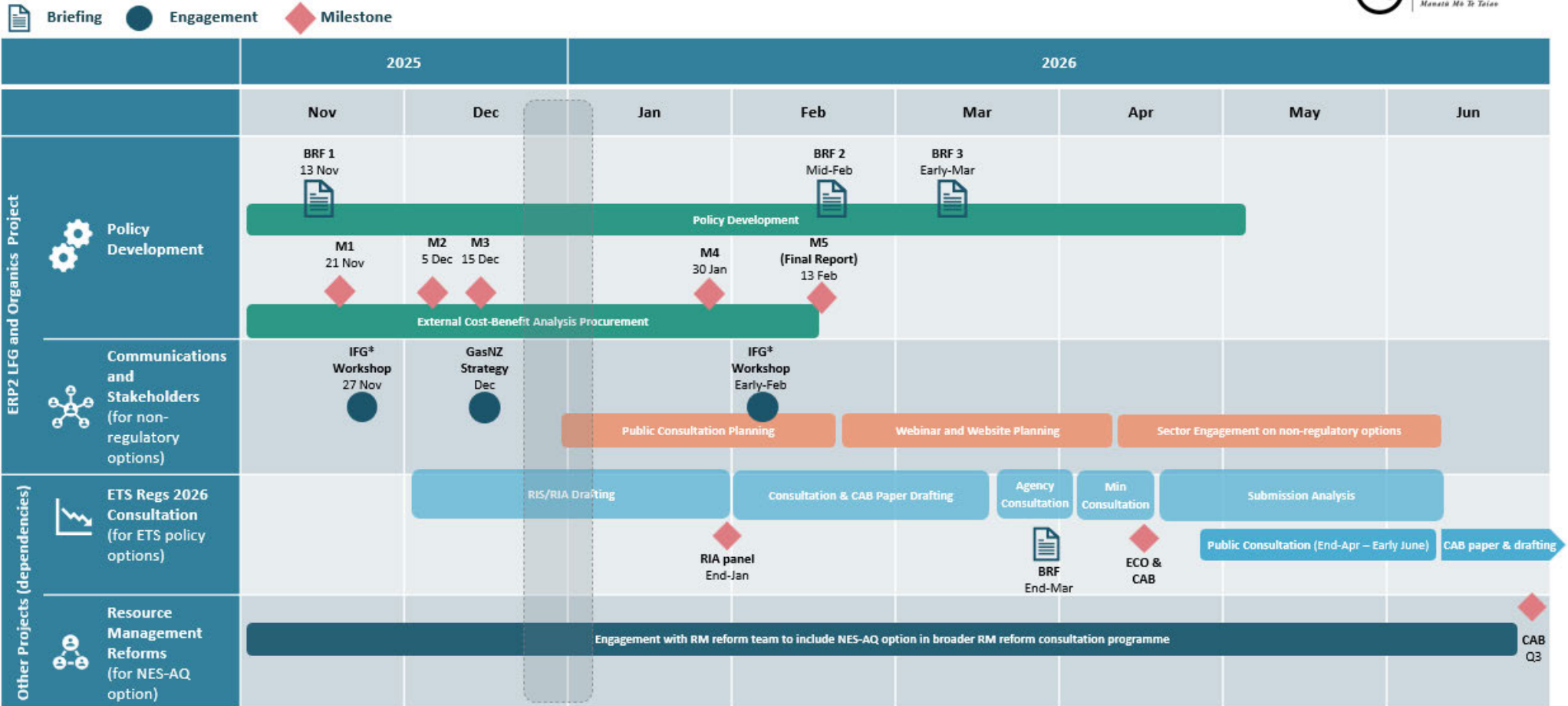
50. We recommend you forward this briefing to the Ministers for Resource Management Reform, Energy, and Climate Change for awareness on the proposals that are relevant to their portfolios.

## **Appendices**

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**Appendix 1:** ERP2 LFG and organics policy – indicative timeline

# Appendix 1: ERP2 LFG & Organics Policy – Indicative timeline



\*IFG = Informal Feedback Group (made up representatives from industry, councils and peak bodies)

Ministry Shutdown  
19 Dec – 4 Jan



## BRIEFING

### Implementing landfill gas management actions in the second emissions reduction plan

<b>Date:</b>	19 March 2026	<b>Priority:</b>	Routine
<b>Security classification:</b>	IN-CONFIDENCE	<b>Tracking number:</b>	26-BRF-00032

	Action sought	Response by
Hon Penny Simmonds <b>Minister for the Environment</b>	<b>Agree</b> to progress policy proposals in this briefing to engagement and consultation approach	30 March 2026
Hon Simon Watts <b>Minister of Climate Change</b>	<b>Approve</b> actions within the Climate Change portfolio (New Zealand Emissions Trading Scheme)	30 March 2026
Hon Chris Bishop <b>Minister Responsible for RMA Reform</b>	<b>Copy</b> for your information	N/A
Simon Court <b>Parliamentary Under-Secretary to the Minister Responsible for RMA Reform</b>	<b>Copy</b> for your information	N/A

<b>Action for Minister's Office staff</b>

<b>Appendices and attachments</b>
Attachment 1: Initial cost-benefit analysis report

<b>Contact for telephone discussion (if required)</b>			
Name	Position	Telephone	1st contact
Glenn Wigley	General Manager	027 4917806	
Kara Lok	Manager	022 303 5283	✓
Briar Wyatt	Author		

<b>The following departments/agencies have been consulted</b>
Environmental Protection Authority (EPA)

Minister's office to complete:

Noted

Overtaken by Events

Approved

Needs change

See Minister's Notes

Declined

Seen

Withdrawn

**Minister's Comments**



## BRIEFING

### Implementing landfill gas management actions in the second emissions reduction plan

<b>Date:</b>	19 March 2026	<b>Priority:</b>	Routine
<b>Security classification:</b>	IN-CONFIDENCE	<b>Tracking number:</b>	26-BRF-00032

## Purpose

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1. This briefing follows our advice in December 2025 [BRF-6828] where you agreed to progress a work programme delivering on the actions in the second emissions reduction plan (ERP2) to reduce organic waste and improve landfill gas capture.
2. We are seeking your agreement to:
  - a. further policy detail of the New Zealand Emissions Trading Scheme (NZ ETS) and National Environmental Standard for Air Quality (NES-AQ) policy levers
  - b. consult on these options through the NZ ETS annual regulatory review and a concurrent white paper.

## Key points

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3. In December 2025, you approved a work programme to deliver on ERP2's projected 1.8Mt CO<sub>2</sub>-e abatement for the waste sector. We are providing two briefings progressing this work programme:
  - a. This first briefing which focuses on landfill gas capture management through the NZ ETS and NES-AQ.
  - b. The second is anticipated end March/early April and covers organic diversion and biogas options.
4. We are seeking your agreement to consult on the policies outlined in paragraphs 5 and 6. and the approach to achieve this. The Minister for the Environment previously agreed in-principle to a dual engagement approach for landfill gas capture and organic waste management policies [BRF-6828 refers]. This briefing proposes specific proposals to include in this engagement approach.
5. We are seeking the Minister of Climate Change's approval to include two policy options in the 2026 NZ ETS annual regulatory review:
  - a. Updating the default emissions factor (DEF) in the Climate Change (Waste) Regulations (and references in other regulations) (modelled to achieve 0.02 Mt CO<sub>2</sub>e abatement in EB3)
  - b. Introducing a new Unique Emissions Factor (UEF) option for highly efficient landfill gas (LFG) capture systems that would enable them to claim up to 100

percent of their gas captured when calculating their NZ ETS obligations when justified by verified evidence (1.95 Mt CO<sub>2</sub>e in EB3).

6. We are seeking the Minister for the Environment's approval to include other refined options for landfill gas management in a white paper for engagement with the waste, and other interested sectors. This would include:
  - a. Broadening waste sector participation in the NZ ETS to include Class 2 landfills, resource recovery facilities and industrial monofills that manage organic waste materials (0.27 Mt CO<sub>2</sub>e EB3)
  - b. Introducing a required minimum efficiency standard of 60 percent for landfill gas capture operations (1.31Mt CO<sub>2</sub>e EB3 in combination with c, below)
  - c. Reviewing the organic content and size thresholds under the current NES-AQ prior to their transition into the new system
7. It is anticipated that engagement on the white paper would commence at the end of May 2026, concurrent to the NZ ETS consultation, to ensure that sector representatives are able to consider the full package proposed and provide feedback on that basis.
8. Resource management policies (6b and 6c above) refined through the white paper approach should be taken to formal consultation as part of the national instruments to be developed under the new resource management system. Subject to your agreement to progress the NES-AQ levers, officials recommend you seek Minister Bishop's agreement to progress these policies via the RM reform.

## Recommended action

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The Ministry for the Environment recommends the Minister for the Environment:

1. **Agree** to further engagement on proposals relating to resource management reform and broadening waste sector participation in the New Zealand Emissions Trading Scheme via a white paper, before making recommendations to the relevant Ministers *Agree / Disagree*
2. **Note** that following consultation, decisions on the proposals in this briefing will sit within Climate Change and Resource Management Reform portfolios *Noted*
3. **Agree** to meet with officials to discuss this briefing *Agree/ Disagree*
4. **Meet** with the Minister for Resource Management Reform to consult on proposals within that portfolio *Agree/ Disagree*

The Ministry for the Environment recommends the Minister of Climate Change:

5. **Agree** to include the proposal to link Unique Emissions Factor use to operator evidence in the 2026 New Zealand Emissions Trading Scheme annual regulatory review consultation. *Agree/ Disagree*
6. **Agree** to include an updated Default Emissions Factor or range for the waste sector in the 2026 New Zealand Emissions Trading Scheme annual regulatory review consultation. *Agree/ Disagree*



Glenn Wigley  
**General Manager, Waste and HSNO Policy**  
Ministry for the Environment

19 / 03 / 2026

Hon Penny Simmonds  
**Minister of the Environment**

\_\_\_ / \_\_\_ / 2026

Hon Simon Watts  
**Minister for Climate Change**

\_\_\_ / \_\_\_ / 2026

## Context

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1. The waste sector contributes 3.8 percent of New Zealand's greenhouse gas emissions, and 7.4 percent of biogenic methane emissions.
2. In December 2025, you approved a work programme to deliver ERP2's projected 1.8Mt CO<sub>2</sub>-e abatement for the waste sector. This abatement is derived from two actions in ERP2:
  - a. Supporting investment through the Waste Minimisation Fund (WMF)
  - b. Investigating improvements to organic waste disposal and landfill gas capture
3. This briefing is the first of two briefings seeking policy decisions to progress to consultation and engagement and focuses on the landfill gas capture aspects of the actions. A second briefing is expected in late March/early April, covering organics diversion and biogas opportunities.
4. The policies in this briefing focus on increasing the efficiency of existing landfill gas capture and ensuring that, where emissions are present, they are managed. While complementary measures including WMF initiatives will increase resource recovery opportunities that divert organic materials away from landfill, the emissions from waste already placed are estimated to need to be managed for at least 30 years after disposal.

### Waste sector contribution to New Zealand's methane targets

5. Officials consider that the options provided in this briefing, and subsequently 26-BRF-00169, present the maximum abatement opportunity within the policy direction you have given to date. We do not consider there are additional abatement opportunities available to support achievement of the 2030 target that would not unduly burden the waste sector. The options outlined in both briefings contribute to achieving the 2050 target.

## We recommend progressing proposals on abatement opportunities to a dual engagement approach

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6. The subsequent sections outline further policy detail on the NZ ETS and NES-AQ policy levers officials are seeking your agreement to progress to public consultation.
7. In September 2025, you agreed that NZ ETS changes should be prioritised in line with the Government's market led climate change strategy.
8. We are seeking your agreement to consult on the following via the NZ ETS annual regulatory review:
  - a. Improve the accuracy of the DEF in the Climate Change (Waste) Regulations (and references in other regulations)
  - b. Introducing a new UEF option for highly efficient landfill gas capture systems that would enable them to claim 100 percent of their gas captured when calculating their NZ ETS obligations (where justified by verified evidence)

9. Further policy development has found there may be more significant abatement opportunities found in amendments to the NES-AQ, with structural changes to the NZ ETS considered only if these measures do not achieve the projected abatement. We are seeking your agreement to undertake targeted engagement via a white paper on the following options:
  - a. Reviewing the organic content and size thresholds under the current NES-AQ prior to their transition into the new system
  - b. Introducing a required minimum efficiency standard of 60 percent for landfill gas capture operations
  - c. Broadening waste sector participation in the NZ ETS to include Class 2 landfills and industrial monofills that manage organic waste materials

## There are opportunities to increase waste sector confidence in the NZ ETS

Policy lever	EB2 (2026 – 2030)	EB3 (2031 – 2035)	2025 – 2050 (cumulative)
Improve the accuracy of the NZ ETS DEF, based on expert review of data	0.06 Mt	0.02 Mt	0.08 Mt
Incentivising best practice landfill gas capture performance from high-efficiency operators*	0.84 Mt	1.95 Mt	7.63Mt
Broadening waste sector participation in the NZ ETS	0.03 Mt	0.27 Mt	2.12 Mt

*\*The abatement potential for this option is considered highly uncertain by officials due to disparity in reported emissions across the greenhouse gas inventory and NZ ETS, and the uncertainty inherent in the current modelling of reported efficiencies. The quoted figures should be considered as the upper bound.*

### Improving the accuracy of the NZ ETS Default Emissions Factor (DEF) for disposal facilities

10. The DEF for landfill operations is derived from a national average composition based on voluntary composition audits of landfills. The DEF is used by operators to calculate their NZ ETS obligations. It is currently 1.023.
11. The national average composition is highly uncertain. Some operators report that their composition is very close to the national average (e.g., paragraph 18 below). However, infrequent audits combined with minimal reporting requirements for private operators means that the accuracy is difficult to assess.
12. The most recent composition data used to inform the current DEF was collected primarily from 2017-2019, for the 2018 national average waste composition estimate.

Some data accessible to officials<sup>1</sup> suggests that there has been some change to the composition of the waste stream since then, with an increased organics component.

13. Officials have sought advice on options for improving the level of accuracy, including through providing a range of options based on landfill characteristics that influence emissions and capture potential. There are five options under consideration:
  - a. Status quo – no change to the DEF
  - b. Updating the national composition average for Class 1 landfills to include composition surveys completed since 2019
  - c. Differentiation of DEF by landfill size
  - d. Differentiation by quantity of soil/rubble/inert
  - e. A series of DEFs by activity that generated the waste (aligned with current information requirements in which operators must provide the activity source of each tonne of waste).
14. We are seeking approval from the Minister of Climate Change to include the above options (paragraph 13a-e) in the 2026 NZ ETS annual regulatory review consultation. Each approach has both merit and potential implementation barriers – stakeholder views will be important for determining a preferred option.

#### **Incentivising best practice landfill gas capture performance from high-efficiency operators**

15. Officials recommend the standard of evidence required in unique emissions factor (UEF) applications should align with the level of gas capture claimed. An inaccurate UEF where the gas capture efficiency is set too high could artificially reduce NZ ETS liabilities and NZ ETS revenue, while not achieving the corresponding emissions reduction. Using a capture efficiency that is too low in UEF applications could create undue costs through the NZ ETS for landfill operators, while not reflecting their emissions abatement achievement.
16. An earlier version of this policy (BRF-6828) saw escalating evidence requirements across five tiers of landfill gas capture recovery efficiency rates. This was subsequently tested with a subset of landfill operators. These operators reported that the cost of composition surveys was already disproportionate to the difference it made for NZ ETS obligations, as the composition underlying the DEF was close to their current composition.
17. Officials have revised the proposal to avoid unnecessary costs in cases where the opportunity to reduce NZ ETS liabilities is lower.
18. Under current NZ ETS regulations, the maximum landfill gas collection efficiency rate that can be claimed is 90 percent. At the time of regulating, this was considered the maximum possible efficiency of landfill gas capture systems. Local operators have provided evidence that they are achieving higher efficiencies and would be incentivised to continue to operate at this maximum efficiency if they could claim 100 percent capture in calculating their NZ ETS obligations.

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<sup>1</sup> Officials completed a desktop analysis of any Solid Waste Analysis Protocol (SWAP) audit results published in regional waste assessments (a regulatory requirement). Results are highly uncertain due to audits including a mix of landfill site and kerbside, with results not comparable as municipal wastes represent only a small portion of the overall waste stream.

19. The proposed approach outlined in the table below focuses on positively incentivising those sites who already report high landfill gas capture efficiency rates up to 90 per cent. This is designed to work in conjunction with the proposed amendments to national standards for air quality, providing an incentive to perform higher than the minimum standard that would be required under those regulations.

<b>Tier</b>	<b>Sites able to utilise this tier</b>	<b>Proposed emissions factor</b>	<b>Proposed evidence required</b>
<b>B</b>	Sites reporting recovery rates up to and including 60 percent*	Section 23C (Unique Emissions Factor regulations) calculation for UEF	Estimated efficiency of LFG collection and destruction system as outlined in current Section 23C(1) of the Climate Change (Unique Emissions Factor) Regulations 2009
<b>A</b>	Sites reporting recovery rates 61 percent and over (up to a maximum of 100 per cent)*	Section 23D (Unique Emissions Factor regulations) calculation for UEF	As above, plus:  Two verified waste composition surveys, in two separate quarters, on waste received in the calendar year prior to initial application (e.g., a 2028 UEF application would need to include two composition surveys completed in the 2027 calendar year)  Verified metered measurement of total gas captured and total gas destroyed or recovered where applicable, for the 2027 calendar year.

\*Officials propose rounding is applied in instances where landfill operator's efficiency falls between the tiers.

20. Introducing the ability to claim up to 100 percent capture efficiencies could incentive operators to undertake engineering and technological changes that will increase their capture rates, and to invest in acquiring the data required to prove these rates in applications.
21. A high bar of evidence of 100 percent capture rates is necessary – previous expert review by the UNFCCC and Ministry officials has questioned the veracity of data underlying 100 percent capture efficiencies reported previously. It is technically difficult to achieve 100 percent capture efficiency rates, with very few sites globally consistently achieving this rate.

### **Broadening waste sector participation in the NZ ETS**

22. The waste sector in New Zealand is diversifying and advancing. There is an increasing focus on the production of gas from waste materials, at the same time as a shift towards fewer and larger, more technologically advanced Class 1 landfills.

23. The Government has indicated support for this diversification through the Government Statement on Biogas issued in October 2025. You both continue to engage with the biogas industry on an industry-led strategy to support the sector to flourish.
24. In early consultation, landfill operators told us that they were being meaningfully incentivised to invest in landfill gas capture by the NZ ETS. This is reflected in UEF applications by those operators, which show higher-efficiency landfill gas capture systems in operation. Informal advisory group stakeholders recommended considering extending NZ ETS obligations to Class 2 landfills.
25. This option is most impactful if you choose not to proceed with adjusting the coverage requirements currently included in the NES-AQ (paragraphs 35 – 43 refer). These two options target the same emissions and behaviours and are not additive. Officials recommend the NES -AQ approach is prioritised due to increased certainty, significance of modelled abatement potential and the results of an initial cost-benefit analysis (CBA) (see Appendix 1).
26. Should this option be progressed, it will require a change to the primary act (Climate Change Response Act 2002) to align the disposal facility definition with the classes outlined in the Waste (Calculation and Payment of Waste Disposal Levy) Regulations 2009.
27. Officials recommend that the proposal to extend NZ ETS obligations to Class 2 landfills and industrial monofills managing organic waste materials is included in the white paper for feedback from the sector and those utilising these types of facility. We would also like to seek views on the inclusion of resource recovery facilities.

## **Requirements for landfill gas capture efficiency and coverage**

28. Broad economic incentives for improving landfill gas capture efficiency are provided through the NZ ETS for Class 1 landfills, and there is also a complementary regulatory approach in place for the basic management of landfill gas through the NES-AQ.
29. An initial cost-benefit analysis shows that regulating landfill gas capture, through a combination of efficiency standards and increased coverage, has the highest return-on-investment and abatement potential. This reflects the higher certainty of a regulated approach for both the sector (in terms of investment, costs of operation and what they need to do) and the Government (in terms of measuring progress towards emissions abatement targets).
30. Officials have thus refined the proposal, outlined below. We recommend that this is progressed through the national instruments to be developed under the new resource management system. This is currently anticipated to go to public consultation in 2027. Prior to this, officials recommend consultation through the white paper in 2026.
31. Sector feedback to date has suggested consideration of regulation of closed and closing landfill sites. Options for closed landfill sites could be considered as part of the white paper engagement process.
32. The table below outlines the projected abatement for the NES-AQ levers across emissions budgets two and three.

<b>Policy lever</b>	<b>EB2</b>	<b>EB3</b>	<b>2025-2050 (cumulative)</b>
A minimum 60 percent efficiency standard for all equipped landfill gas capture systems (with no changes to coverage)	0.1 Mt	0.64 Mt	3.76 Mt
A minimum 60 percent efficiency standard for all equipped landfill gas capture systems <i>and</i> Changes to the coverage of landfill gas capture regulations to capture Class 1, 2 and industrial monofill facilities accepting putrescible waste	0.25 Mt	1.31 Mt	7.34 Mt

### **Changes to the coverage of landfill gas capture regulations to capture Class 1, 2 and industrial monofill facilities accepting putrescible waste**

33. Most of the organic waste disposed of in New Zealand goes to sites with LFG collection. However, only 18 of the total 41 open Class 1 landfills registered in the Online Waste Levy System are known to have landfill gas capture installed. There are no requirements for any landfill operator, of any class, to report whether they have landfill gas capture systems in operation.
34. Landfill gas management requirements as per the NES-AQ currently apply only if a site:
- a. has a capacity of one million tonnes or more,
  - b. contains 200,000 tonnes of waste or more,
  - c. is currently accepting waste and
  - d. that waste consists of five percent or more putrescible<sup>2</sup> or biodegradable materials.
35. Officials recommend removing the five percent threshold (d, above) so that Class 1 and 2 disposal facilities and some industrial monofills accepting any putrescible material are required to manage their methane emissions or stop accepting putrescible waste. Feedback from parts of the sector highlight a need for policies to ensure a level playing field across classes of landfill.

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<sup>2</sup> The Volume to Weight Conversion Factors (Schedule 2, Waste Minimisation (Information Requirement) Regulations 2021 refer to putrescible waste as “grass, leaves, foliage, branches, and food waste; does not include soil or logs”.

36. Class 3-5 landfills are excluded because they are only allowed to accept inert<sup>3</sup> materials or virgin excavated natural materials, free of putrescible or degradable elements<sup>4</sup>.
37. Industry guidelines<sup>5</sup> state that landfill gas should already be monitored at all Class 1 and Class 2 landfill sites. This means monitoring systems are likely already in place at many impacted facilities.
38. Removing the five percent threshold simplifies regulation for these facilities, as they will not need to actively monitor the composition of the waste in their facilities to calculate whether they are breaching the threshold.
39. Requiring sites that accept putrescible materials for disposal to manage their emitted methane is the most certain approach to avoid leakage across landfill classes and ensure that most of the organic waste disposed is disposed of at sites that can manage the emissions effectively.
40. Passive gas management systems<sup>6</sup> could be used where there is insufficient landfill gas being produced to warrant or enable flaring or utilisation of gas collected. These are considerably less expensive for operators to install. Officials will seek input from the sector on whether passive gas management systems would be an acceptable management option for sites with a very low proportion of organic materials, and an appropriate compliance approach to assessing this.
41. Operators of Class 1 or Class 2 landfills currently accepting putrescible and biodegradable materials who do not wish to invest in landfill gas capture can choose to no longer accept these materials. The impact of this change on landfill revenue will vary depending on the definition of putrescible and biodegradable landed, and if timber is included. Some operators are likely to choose to invest in gas capture and utilisation opportunities.
42. Changes to acceptance criteria based on landfill gas capture status may also encourage greater uptake of resource recovery facilities where these are available. Where disposal continues, it is preferable for organic waste to be disposed of at sites with landfill gas capture equipped.
43. In addition to considering the 5 percent organics threshold, stakeholders have suggested that the white paper engagement process seeks views and evidence on the other thresholds outlined in the current regulations, including the total size and capacity of a landfill site. This could lead to changes for Class 1 landfill coverage, capturing smaller sites. There is some risk that extending requirements to all Class 1 landfills would impact on New Zealand's ability to respond to extreme weather events and efficiently manage disaster waste if these smaller sites decide to close. Smaller, more isolated landfill sites have been vital in providing resilience in these cases. Officials recommend seeking views through the white paper on whether other restrictions on when landfill gas capture regulations apply should be reviewed.

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<sup>3</sup> Non-reactive waste that will not break down naturally either biologically or chemically

<sup>4</sup> Technical Guidelines for Disposal to Land 2023 – WasteMinz Disposal to Land Technical Advisory Group

<sup>5</sup> Technical Guidelines for Disposal to Land 2023 – WasteMinz Disposal to Land Technical Advisory Group

<sup>6</sup> These typically include vent stacks and/or gravel filled trenches

## **Introducing an efficiency standard of 60 percent gas capture**

44. Advancing technology means that we can now expect higher performance where landfill gas capture is installed than we could when regulations were drafted in 2004. The approximate average gas capture efficiency, weighted by methane generation per facility, is 47 percent. However, this data is self-reported and considered highly uncertain.
45. Efficiency rates achieved internationally vary greatly, with reported average efficiencies ranging from 30 percent in Iceland, to more than 60 percent in the United States, United Kingdom and Finland. There is further variation in site specific efficiency rates – for example, operational sites in the UK in 2014 were found to have rates between 26-91 percent<sup>7</sup>.
46. New Zealand previously used a capture efficiency rate of 68 percent for open landfills in the Greenhouse Gas Inventory. A 2022 expert review team from the UNFCCC stated that New Zealand did not have the institutional data framework to back this up, and that basing our reported capture rates on the United Kingdom (as was the case) was insufficient due to differences in landfill regulations and climate, topography and other factors which affect gas capture infrastructure capability.
47. In 2023, 2024 and 2025, the Ministry undertook various surveys and interviews with landfill operators to better understand the operations of their systems. The results of this data-gathering exercise suggests that some Class 1 landfills that receive the highest volumes of waste are already capturing at least 60 percent of their emissions. However, some smaller landfills could not provide the evidence required to estimate their gas capture efficiency. The range of efficiencies estimated from these surveys ranged from 40 – 80 per cent, but the reliability of many of the survey responses was judged to be too low to use, considerably reducing the average efficiency estimate used.
48. This lack of institutional data means that it is difficult to determine, without access to commercially sensitive sector information, an accurate median efficiency for New Zealand upon which to base a high-efficiency standard.
49. Officials are thus recommending engaging through the white paper on a 60 per cent efficiency standard to seek sector views on the feasibility of this figure and elicit data that can be used to justify recommending a higher or lower standard should the industry believe the figure is not correct. We are also recommending engagement on:
  - a. options for a compliance approach and information requirements for regional councils and central Government to manage compliance with this standard, and
  - b. an appropriate implementation timeframe and transitional period for sites that would need to make infrastructure investments.

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<sup>7</sup> Landfill Gas Management Final Report – Eunomia Ltd on behalf of the Ministry for the Environment (May 2025), currently unpublished.

## Next steps

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50. Subject to your agreement officials will continue work to ensure the policy options outlined below are included during public consultation as part of the NZ ETS 2026 Regulatory Review, targeted for May/June 2026:
  - a. Improving the accuracy of the DEF through updated national composition information
  - b. Improving the accuracy of waste UEFs through a tiered evidence approach.
51. Cabinet approval to consult on the 2026 annual NZ ETS regulatory review will be sought by Minister Watts in April 2026.
52. Subject to your agreement to consult on the options outlined below via a white paper officials will continue to work with the RM reform team:
  - a. remove the organic content threshold under the current NES-AQ upon transition into the new system.
  - b. introduce a required minimum efficiency standard of 60 percent for landfill gas capture operations.
53. Officials recommend you seek Minister Bishop's agreement to progress these policies via work on national instruments under the new resource management system.
54. It is anticipated that officials will engage on the white paper between May and June 2026 and return to you with final policy recommendations, and an update on progress of NZ ETS options, by the end of August 2026.
55. Officials propose pausing work on expanding waste sector participation until the policy package proposed in this briefing has been implemented.
56. We will provide another briefing in late March/early April which will cover additional policy options to complement the options outlined in this briefing. These options include supportive measures to reduce and divert organics to landfill and to support biogas production.
57. Officials would be happy to meet with you to discuss this briefing.



## BRIEFING

### Biogas and other policy options to reduce emissions from organic waste

<b>Date:</b>	23 April 2026	<b>Priority:</b>	Routine
<b>Security classification:</b>	IN-CONFIDENCE	<b>Tracking number:</b>	BRF-00169

	Action sought	Response by
Hon Nicola Grigg <b>Minister for the Environment</b>	<b>Respond</b> to recommendations and discuss with officials (if required).	30 April 2026
Hon Simeon Brown <b>Minister for Energy</b>	<b>Copy</b> for your information	N/A

<b>Action for Minister's Office staff</b>

<b>Appendices and attachments</b>
Appendix 1: High-value National Food Waste Reduction Partnerships (in order of priority for residual funding)

<b>Contact for telephone discussion (if required)</b>			
Name	Position	Telephone	1st contact
Glenn Wigley	General Manager		
Kara Lok	Manager	022 303 5283	✓
Ashleigh Mansbridge	Senior Policy Advisor		

<b>The following departments/agencies have been consulted</b>
Ministry of Business, Innovation & Employment (MBIE), Energy Efficiency & Conservation Authority (EECA)

- Minister's office to complete:
- |  |   |                                    |
|--|---|------------------------------------|
| <input type="checkbox"/> Noted               | <input type="checkbox"/> Approved             | <input type="checkbox"/> Declined  |
| <input type="checkbox"/> Overtaken by Events | <input type="checkbox"/> Needs change         | <input type="checkbox"/> Seen      |
|  | <input type="checkbox"/> See Minister's Notes | <input type="checkbox"/> Withdrawn |

#### Minister's Comments



## BRIEFING

# Biogas and other policy options to reduce emissions from organic waste

<b>Date:</b>	23 April 2026	<b>Priority:</b>	Routine
<b>Security classification:</b>	IN-CONFIDENCE	<b>Tracking number:</b>	BRF-00169

## Purpose

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1. This briefing builds on earlier advice in March 2026 [26-BRF-00032] where Minister Simmonds agreed to progress policy proposals focussing on landfill gas capture to consultation.
2. Officials are seeking your agreement to progress the non-regulatory policy options for organic diversion and biogas outlined in this briefing to consultation via a white paper. These actions complement the landfill gas (LFG) management policy options outlined in 26-BRF-00032.

## Key points

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3. In December 2025, Minister Simmonds approved a work programme to deliver on the second emission reduction plan's (ERP2) projected 1.8Mt CO<sub>2</sub>-e abatement for the waste sector [25-BRF-6828 refers]. In addition to landfill gas (LFG) management policies, Minister Simmonds approved further policy development on four policy themes covering non-regulatory options to take a systems approach and complement the landfill gas policies. The four themes are:
  - a. A policy to support biogas production
  - b. Facilitating options for businesses that produce large quantities of food waste to recover food waste where diversion opportunities are available
  - c. Support for territorial authorities to deliver high-quality, value-for-money kerbside collection services
  - d. Funding to incentivise action and drive uptake of resource recovery services.
4. In December 2025, Minister Simmonds also agreed to the engagement approach for the LFG capture policies and the non-regulatory measures, consulting via the annual New Zealand Emissions Trading Scheme (NZ ETS) regulations process and via a parallel white paper.
5. This briefing builds on the December and March advice and covers non-regulatory policy options for organics diversion and biogas to complement LFG management policy options.
6. Officials have engaged with key stakeholders and undertaken further development on policies across the four themes outlined above.

7. We are seeking your agreement to include the policy options outlined in this briefing in a white paper for consultation. They include:
- a. **Policies to support biogas production** such as mapping local infrastructure gaps and opportunities for organic diversion and providing guidance on biogas through a waste lens, including updating the Ministry's Waste to Energy (WtE) Guide.
  - b. **Facilitating options for businesses that produce large quantities of food waste to recover food waste where diversion opportunities are available** via sharing templates and guidance for voluntary food waste reduction and diversion plans, establishing a national action plan and a Government-Industry working group on food waste, and providing updated guidance to businesses on managing unavoidable organic waste.
  - c. **Support for territorial authorities (TAs) to deliver high-quality, value-for-money kerbside collection services** through sharing resources and tools with TAs to enable optimisation of kerbside organics services and funding trials for increasing uptake of organic collections.
8. These options align with previous Government direction to limit policies in this area to non-regulatory, non-mandatory measures.
9. It is anticipated that engagement on the white paper would commence in June 2026, concurrent with the 2026 NZ ETS regulatory review consultation which would cover NZ ETS-related landfill gas policy options. This will ensure that sector representatives are able to consider a broad package of proposed ERP2 waste sector policies and provide feedback on that basis.
10. The white paper will be provided for your approval in a subsequent briefing, in May 2026 [26-BRF-00994].
11. Stakeholder feedback on the white paper will inform which policies are proposed to be implemented to deliver on the projected abatement of 1.8Mt CO<sub>2</sub>-e for the waste sector under the ERP2 work programme.
12. Note that a range of policy options have been included under each theme for feedback in the white paper. However, we will not be able to progress all the options due to resourcing constraints we will look to focus on the measures which complement the proposed regulatory levers. This will be made clear in the white paper, and policies will be prioritised following consultation feedback, with recommended policies for implementation to be presented to you for approval in a further briefing in August 2026.
13. In addition to the actions in para 7, officials are also seeking your agreement to s 9(2)(f) [redacted] with strong alignment to ERP2<sup>(iv)</sup> policy objectives. This is consistent with Minister Simmond's prior approval to investigate a policy for funding to incentivise action and drive uptake of resource recovery services [25-BRF-6828 and 25-BRF-00019 refer]. If supported, s 9(2)(f)(iv) [redacted]  
[redacted]  
Subject to your agreement, officials will provide a further briefing outlining s 9(2)(f)(iv) [redacted] [redacted] in more detail in May.

## Recommended action

The Ministry for the Environment recommends you:

1. **Agree** to include the below policies in a white paper for targeted stakeholder engagement in June, which will then be prioritised based on feedback:

<i>Policies supporting the production of biogas</i>	
a) Provide guidance on biogas through a waste lens, including updating the Ministry's Waste to Energy Guide	<i>Agree / Disagree</i>
b) Map local infrastructure gaps and opportunities for organic diversion	<i>Agree / Disagree</i>
<i>Facilitating food waste recovery for businesses that produce large quantities of food waste</i>	
c) Create a national action plan to reduce food waste	<i>Agree / Disagree</i>
d) Establish a Government-Industry working group on food waste	<i>Agree / Disagree</i>
e) Research barriers and provide education to businesses on food waste reduction	<i>Agree / Disagree</i>
f) Share templates for voluntary food waste reduction and diversion plans	<i>Agree / Disagree</i>
g) Support a nationally consistent, voluntary food waste reporting framework for businesses	<i>Agree / Disagree</i>
h) Provide updated guidance to businesses on managing unavoidable organic waste	<i>Agree / Disagree</i>
<i>Support TAs to deliver high-quality, value for money kerbside collection services</i>	
i) Develop standardised modelling tools for TAs, for scoping and contracting kerbside collections	<i>Agree / Disagree</i>
j) Seek feedback from TAs on barriers to organics collections	<i>Agree / Disagree</i>
k) Share resources with TAs to support optimisation of kerbside organics services by households	<i>Agree / Disagree</i>
l) Fund trials for increasing uptake of organic kerbside collections and share findings nationally	<i>Agree / Disagree</i>
m) Showcase organic waste reduction and diversion as a climate change mitigation tool	<i>Agree / Disagree</i>

2. **Agree** in principle to s 9(2)(f)(iv) [redacted] to incentivise action and drive uptake of resource recovery services. *Agree / Disagree*
3. **Note** if you agree to recommendation 2, an additional briefing which outlines the s 9(2)(f)(iv) [redacted] in detail will be provided for your approval. *Noted*
4. **Note** that you will receive a further briefing in May which includes the full white paper (including LFG management policies previously approved by Minister Simmonds) for your approval prior to targeted stakeholder engagement. *Noted*



Glenn Wigley  
**General Manager – Waste and HSNO  
Policy**  
CCRE, Ministry for the Environment

Hon Nicola Grigg  
**Minister for the Environment**

23/ 04 / 2026

\_\_\_ / \_\_\_ / 2026

## Background

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1. The Government's Climate Strategy outlines New Zealand's commitments to reducing emissions to achieve the 2050 net zero target, using a system of five-year emissions budgets as outlined in the Climate Change Response Act 2002. The second Emissions Reduction Plan (ERP2) sets out policies and actions to stay within the second emissions budget (2026–2030).
2. In 2024, the waste sector contributed 4 percent of New Zealand's greenhouse gas emissions and 7.5 percent of biogenic methane emissions. Through ERP2 the Government has committed to a projected emissions abatement of 0.8Mt CO<sub>2</sub>-e during EB2 from organic waste or landfill gas policy related actions, in addition to 1Mt CO<sub>2</sub>-e abatement from investment by the Waste Minimisation Fund (WMF).
3. In December 2025, Minister Simmonds approved a work programme to deliver ERP2's projected 1.8Mt CO<sub>2</sub>-e abatement for the waste sector [BRF-6828 refers]. In March 2026, the Minister approved policies specifically relating to landfill gas (LFG) management [26-BRF-00032 refers].
4. This current briefing builds on the March 2026 advice and seeks agreement to targeted engagement through a white paper, for policies relating to improvements to organic waste disposal, including options to support biogas.
5. These policies focus on non-regulatory actions that sit alongside the proposed regulatory measures for LFG management via the NZ ETS and the National Environmental Standards for Air Quality (NES-AQ). Together, they are intended to take a broad sectoral approach, addressing emissions from discarded organic material both before and after it reaches landfill.
6. The policies cover four themes that Minister Simmonds approved for further policy development in December 2025 [25-BRF-6828 refers] which are:
  - a. Policy to support biogas production
  - b. Facilitating options for businesses that produce large quantities of food waste to recover food waste where diversion opportunities are available (0.05Mt estimated abatement across EB2)
  - c. Support for territorial authorities to deliver high-quality, value-for-money kerbside collection services (0.08Mt - 0.1Mt estimated abatement across EB2)
  - d. Funding to incentivise action and drive uptake of resource recovery services.
7. When these policy themes were first presented in September 2025 [25-BRF-6163 refers], emissions abatement was only attributed to two of the four options (5b and 5c above).
8. The estimated abatement for options 5b and 5c across EB2 remains unchanged, as the policy detail has not shifted materially. As some policy options within the four themes target the same emissions in different ways, abatement will be remodelled once the policies have been refined further and prioritised, following stakeholder feedback through the white paper.
9. The subsequent sections outline the policies that officials are seeking your agreement to progress to the white paper, and the rationale for doing so, as well as an update on progress towards other policy options.

## **Policies supporting the production of biogas**

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10. Officials are seeking your agreement to include the following policies to support the production of biogas in the white paper:

- a. ***Provide guidance on biogas through a waste lens, including updating the Ministry's Waste to Energy (WtE) Guide:*** Current Ministry guidance on biogas is limited, and the WtE Guide has not been updated since it was created in 2020<sup>1</sup>. Updating the guidance in line with the *Government Statement on Biogas* would help councils and businesses understand when biogas is an appropriate option for managing unavoidable organic waste and reducing emissions. It would also ensure the guidance remains aligned with the Government's broader work programme and any outdated references and actions could be addressed.

This also presents an opportunity to send a clearer signal of support for biogas where appropriate. Feedback from some biogas proponents as part of the 2025 consultation on the planned amendments to the Waste Minimisation Act 2008 (WMA) to remove the blanket levy exclusion for WtE suggests the proposal has been perceived by some in the sector as potentially disadvantaging their operations<sup>2</sup>. While any levy application would be contingent on WMA amendments and future regulatory decisions, providing guidance on biogas now would help clarify Government intent and send a more positive signal to the sector.

- b. ***Map local infrastructure gaps and opportunities for organic diversion:*** Stakeholder feedback outlines that diversion of unavoidable food waste is not always possible due to a lack of accessible organic processing infrastructure in some areas. To achieve widespread food waste diversion, distributed infrastructure is required close to production, processing and retail sites. Mapping gaps could help with more targeted WMF investment in new infrastructure and encourage partnerships, for example where several large businesses operate in the same area, or for multiple councils, where economies of scale are achieved by combining feedstocks to support a new biogas or composting plant.

11. In addition, the Ministry will continue to support EECA's national assessment of organic waste feedstocks. EECA is leading the delivery of an independent region-by-region assessment of organic waste feedstocks across New Zealand. This work will provide a detailed evidence base to quantify potential WtE yields, including AD and biomethane production, while remaining agnostic to end-use applications. The Ministry will support this work by contributing waste sector data and policy insights to ensure the assessment

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<sup>1</sup> [Waste to energy guide for New Zealand](#)

<sup>2</sup> During consultation, Ecogas wrote that it "strongly opposes the proposed removal of waste levy exemptions for waste-to-energy facilities, particularly as it may impact anaerobic digestion (AD) operations...Applying the waste levy to AD facilities would undermine the hierarchy principle, compromise investment economics, and hinder New Zealand's ability to meet GHG emission reduction targets". The Bioenergy Association wrote "A uniform levy on all waste-to-energy applications could inadvertently penalize low-impact, beneficial technologies such as anaerobic digestion while failing to discourage more polluting methods such as incineration plants and landfills with inefficient gas capture".

accurately reflects real waste flows and aligns with waste minimisation and emissions reduction objectives.

12. These proposed policies align with the *Government Statement on Biogas* and support progress on some actions in GasNZ's Biomethane Strategy and Action Plan, which was presented to Minister Simmonds and Minister Watts on 4 March 2025.
13. The GasNZ Strategy focuses on biomethane, which is produced from biogas and upgraded for injection into the gas network. Officials have taken a broader approach to policy work that considers biogas opportunities beyond biomethane, including actions that could proceed independently of the Strategy. This recognises that biogas can have other benefits outside of conversion to biomethane, including generation of electricity for onsite use, or for injection back into the electricity grid<sup>3</sup>.
14. In parallel, officials are working with MBIE to review the Strategy and will provide advice on the feasibility and prioritisation of proposed actions. MBIE will lead this work.
15. Officials have also considered an option to explore whether WMF signals could better support biogas projects, particularly those that reduce emissions from organic waste streams that are not always destined for landfill. Several biogas applications are already in progress and current WMF funding is largely committed, so officials recommend this is not included in the white paper but could be revisited if the pipeline for organics projects reduces.

## **Facilitating food waste recovery for businesses that produce large quantities of food waste**

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16. Officials are seeking your agreement to include in the white paper the following policies to facilitate food waste recovery for businesses that produce large quantities of food waste. These policies provide a non-regulatory approach to reducing emissions from food waste by supporting prevention at source and effective recovery of unavoidable food waste. They are designed to drive voluntary action and complement other measures such as biogas production, without imposing significant costs on businesses.
17. The policies have been tested and prioritised through a workshop with 14 stakeholders, representing food producers and retailers, food waste reduction and food rescue organisations, waste reduction advocates and organic processors.
  - a. **Create a national action plan to reduce food waste:** A national action plan could enable system change on food waste and support reduction of food waste emissions at source. Stakeholder feedback suggests this could provide direction, commitment and reduce fragmentation across the food sector from a waste perspective. This could support the broader *Waste and Resource Efficiency Strategy* by driving prevention at the top of the waste hierarchy, reducing emissions at source, and providing more targeted guidance for food businesses.
  - b. **Establish a Government-Industry working group on food waste:** Stakeholders strongly supported this option as an opportunity to break down system barriers and reduce duplication of efforts across Government and the

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<sup>3</sup> Waste to Energy Technology Implications in the Aotearoa New Zealand Context: A report for Waikato Regional Council and Tauranga City Council, October 2023 - [Waste to energy technology implications in the Aotearoa New Zealand context](#)

food and waste sectors. Officials from multiple government agencies currently meet every 2-3 months to share updates on their food-related work streams. However, the group does not work specifically on food waste or include external/industry engagement, leaving a gap in coordinated planning and action on food waste reduction.

- c. **Research barriers and provide education to businesses on food waste reduction:** This action focuses on identifying the main barriers to food waste reduction and food rescue and using this evidence to develop targeted sector or region-specific guidance and practical case studies to support businesses to take action, drawing on existing research and sector expertise.
- d. **Share templates for voluntary food waste reduction and diversion plans:** This option supports businesses by sharing templates and practical guidance on how to complete food waste reduction and diversion plans, to help them voluntarily reduce and divert food waste. This builds on existing work with large food producers led by Kai Commitment. This option, along with a voluntary food waste reporting framework (16e), are particularly valuable if the existing Food Waste Reduction Partnership with Kai Commitment is not extended beyond June 2026 (see paragraph 19).
- e. **Support a nationally consistent, voluntary food waste reporting framework for businesses:** This would enable visibility of food waste, incentivise its recovery, and make benchmarking and performance indicators possible. Reporting would be aligned with the Ministry's *2025 Food Loss and Waste Baseline* parameters and existing waste sector information requirements to support standardisation for reporting and measurement.
- f. **Provide updated guidance to businesses on managing unavoidable organic waste:** This would involve updating current Government guidance<sup>4</sup> on what processing options best suit particular businesses or food waste types. It could also involve encouraging partnerships, for example, where several large businesses operate in the same area and economies of scale could be achieved by combining feedstocks with kerbside collections to support a new biogas or composting plant. This option aligns closely with the action to map local infrastructure gaps and opportunities for organic diversion (see paragraph 10b), helping businesses make informed decisions about diversion and recovery pathways.

## Supporting TAs to deliver high-quality, value-for-money kerbside collection services

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18. Officials are seeking your agreement to include the following policies in the white paper to support TAs to deliver high-quality, value-for-money kerbside collection services. These options were tested through a workshop with 11 TAs at different stages of kerbside collection delivery, from feasibility testing through to established collection services. They are intended to reduce barriers for TAs and encourage greater use of collections by

<sup>4</sup> [Reducing food waste: tips for businesses | NZ Government](#)

residents, as well as supporting diverse organic processing options such as biogas production.

- a. **Develop standardised modelling tools for TAs, for scoping and contracting kerbside collections:** Standardised models could help early internal investigations to get support to progress an organic collection, reduce costs to councils and develop high quality, value for money contracts across TAs.
- b. **Seek feedback from TAs on barriers to organics collections:** Two thirds of all councils do not currently have organic collections in place. Initial feedback from TAs indicates a range of barriers to implementing organics collections, despite many councils having had positive experiences accessing WMF support. Officials recommend using the white paper to seek further TA feedback on barriers to implementation, including potential funding barriers.
- c. **Share resources with TAs to support optimisation of kerbside organics services by households:** Low uptake of organics collections by residents and contamination with non-allowable materials are widespread challenges across TAs, particularly for smaller councils with limited communications capability. The Ministry could build on the best-practice resources available on our website by exploring how best to increase knowledge and use of these by councils, as well as creating additional tools, and council case studies and benchmarking.
- d. **Fund trials for increasing uptake of organic kerbside collections and share findings nationally:** This would involve targeted trials to increase household uptake of kerbside organics services, such as the use of compostable liners in food scraps caddies or bins. Auckland and Ruapehu Councils already use liners, while other councils have expressed interest in trialling whether liners increase participation. WMF funding could support time-limited trials, with results shared with TAs nationally to support evidence-based decision-making.
- e. **Showcase organic waste reduction and diversion as a climate change mitigation tool:** Public awareness of the link between food scraps diversion and emissions reduction (through avoided methane from landfills) is generally low. Increasing awareness through MfE communications, such as website updates or social media channels, could support greater uptake of kerbside organics services and build needed demand for new collections from residents. This option is well supported by councils we engaged with, who agreed that better understanding of emissions benefits would increase use of and support for organic collection services.

## Funding to incentivise action and drive uptake of resource recovery services

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19. Officials have identified an opportunity to s 9(2)(f)(iv)

s 9(2)(f)(iv)

20. Extension of the partnerships was considered by Minister Simmonds in December 2025 using levy underspends from the Environmental Investment Fund (EIF), but funding was prioritised to support catchment groups [25-BRF-00019 refers]. At that time, the FWRP extension option scored highly against the agreed prioritisation framework.
21. The s 9(2)(f)(iv) are closely aligned with ERP2 objectives and deliver national-level engagement, sustained sector participation and system-wide benefits (see Appendix 1 for project details). They support emissions reduction by reducing food waste early in the food waste lifecycle, and across a range of food waste sources, including food producers and retailers, hospitality businesses, and households. Research shows that intervening earlier in the food system yields the greatest emissions savings<sup>7</sup>. Where food waste is unavoidable, s 9(2)(f)(iv). This complements current WMF objectives to support organic processing infrastructure.
22. Officials are seeking your agreement in principle to s 9(2)(f)(iv). Subject to your agreement, officials will provide a further briefing setting out s 9(2)(f)(iv) which will be outlined in the subsequent briefing.

## Next steps

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23. Subject to your agreement, officials will incorporate the recommended policy options above into the white paper for targeted stakeholder engagement in June 2026. The white paper will also include the following approved ERP2 LFG management policy options:
- Broadening waste sector participation in the NZ ETS to include Class 1 landfills, resource recovery facilities and industrial monofills that manage organic waste materials
  - Introducing a required minimum efficiency standard of 60 percent for landfill gas capture operations
  - Reviewing the organic content and size thresholds under the current NES-AQ prior to their transition into the new system.
24. We will seek your approval in a subsequent briefing for the final white paper in May 2026, before targeted engagement.
25. White paper feedback from targeted stakeholders will help determine which policies to progress, how to prioritise them, and what internal resourcing is required for implementation.

<sup>6</sup> The funding in this category is historic unallocated levy funding which is subject to a narrower scope and can only be used for waste minimisation (Schedule 1 of the WMA).

<sup>7</sup> [Food loss and waste in Aotearoa New Zealand: Towards a 50% reduction](#), 2024.

26. It is anticipated that officials will return to you with final policy recommendations for implementation by the end of August 2026, following feedback on the options included in the white paper.
27. Additionally, if you agree in principle to s 9(2)(f)(iv) officials will provide a further detailed briefing setting out the s 9(2)(f)(iv) options for your approval.







## BRIEFING

# Agreement to release landfill gas reduction and organic waste sector feedback document and supporting advice for targeted engagement

<b>Date:</b>	25 May 2026	<b>Priority:</b>	Routine
<b>Security classification:</b>	IN-CONFIDENCE	<b>Tracking number:</b>	26-BRF-00994

	Action sought	Response by
Hon Nicola Grigg <b>Minister for the Environment</b>	<b>Agree</b> to release the sector feedback document for targeted engagement and proactively release supporting documents.	3 June 2026
Hon Simeon Brown; Hon Simon Watts; Hon Chris Bishop <b>Minister for Energy; Minister of Climate Change; Minister Responsible for RMA Reform</b>	<b>Copy</b> for your information	N/A

### Action for Minister's Office staff

### Appendices and attachments

Appendix 1: Sector Feedback Document - Have your say on options to reduce emissions from organic waste

Appendix 2: BRF-6163, BRF-6828, 26-BRF-00032, and 26-BRF-00169 with proposed redactions applied.

### Contact for telephone discussion (if required)

Name	Position	Telephone	1st contact
Glenn Wigley	GM/Dep Sec		
Kara Lok	Manager	022 303 5283	✓
Jiqiao Shi	Author		

### The following departments/agencies have been consulted

Minister's office to complete:

Approved

Declined

[IN-CONFIDENCE]

Noted

Needs change

Seen

Overtaken by Events

See Minister's Notes

Withdrawn

**Minister's Comments**

[IN-CONFIDENCE]



## BRIEFING

# Agreement to release landfill gas reduction and organic waste sector feedback document and supporting advice for targeted engagement

<b>Date:</b>	25 May 2026	<b>Priority:</b>	Routine
<b>Security classification:</b>	IN-CONFIDENCE	<b>Tracking number:</b>	26-BRF-00994

## Purpose

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1. This briefing seeks your agreement to release a sector feedback document for targeted engagement as part of the Government’s wider work programme to reduce emissions from the waste sector under the second emissions reduction plan (ERP2).
2. It also seeks your agreement to proactively release the five supporting briefings (this briefing, BRF-6163, BRF-6828, 26-BRF-00032, 26-BRF-00169). Officials are also proposing to release the commissioned analysis alongside the sector feedback document.

## Key points

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3. In April you agreed to progress 13 non-regulatory levers via a sector feedback document (previously referred to as a “white paper” in 26-BRF-00169) for targeted engagement.
4. Officials have drafted the sector feedback document which progresses the second emissions reduction plan action to improve organic waste management and increase the efficiency of landfill gas management. This, alongside targeted Waste Minimisation Fund investment into infrastructure projects and systems that reduce organic waste and emissions (and other waste streams) amounts to 1.8mt CO<sub>2</sub>e of abatement.
5. The sector feedback document includes regulatory and non-regulatory levers focused on:
  - a. organic waste reduction and diversion by businesses
  - b. support for territorial authorities to improve kerbside organics services
  - c. biogas
  - d. landfill gas management.
6. It complements the waste policies included in the 2026 New Zealand Emissions Trading Scheme regulatory review, forming the policy package aimed at improving organic waste management and increasing the efficiency of landfill gas management.
7. Officials have determined that releasing the sector feedback document does not require Cabinet approval. The document focuses on early, iterative testing of options through targeted engagement, aligning with the Department of the Prime Minister and Cabinet’s guidance (Good Practice Guide for Community Engagement, 2023). While the sector

feedback document references potential regulatory measures, it explicitly notes these are included for early feedback only. Any regulatory or legislative changes you choose to progress beyond targeted engagement will be subject to standard Cabinet approval and formal consultation processes. Other parts of the document propose non regulatory measures.

8. Officials intend to undertake targeted engagement on the sector feedback document in parallel to the NZ ETS annual regulatory review consultation for four weeks from 12 June. Feedback will inform which policies are ultimately prioritised for implementation to meet our abatement targets.
9. Following this engagement period, officials will report back to you with a summary of submissions and seek your direction on which policy options to progress. This will include resourcing implications for recommended options.

## Recommended action

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The Ministry for the Environment recommends you:

- |   |                         |
|---|-------------------------|
| 1. <b>Agree</b> to release the attached sector feedback document for a four-week targeted engagement starting on 12 June 2026.  | <i>Agree / Disagree</i> |
| 2. <b>Agree</b> to proactively release BRF-6163, BRF-6828, 26-BRF-00032, 26-BRF-00169, and this briefing.   | <i>Agree/ Disagree</i>  |
| 3. <b>Agree</b> to have the foreword included in the draft sector feedback document (Attachment 1) attributed to yourself when published. If you do not agree, the foreword will be attributed to the Secretary for the Environment instead.  | <i>Agree/ Disagree</i>  |
| 4. <b>Note</b> that officials will publish the indicative cost benefit analysis and other reports commissioned to support policy analysis and engagement on the Ministry's website.   | <i>Noted</i>            |
| 5. <b>Note</b> that following engagement, officials will report back with a summary of submissions and seek your direction on final policy decisions, including the prioritisation of non-regulatory options and future funding requirements. | <i>Noted</i>            |



Glenn Wigley  
**General Manager**  
Waste and HSNO Policy, Ministry for the  
Environment  
25 / 05 / 2026

Hon Nicola Grigg  
**Minister for the Environment**

\_\_\_ / \_\_\_ / 2026

## Background

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### The waste sector has actions to deliver under the second emissions reduction plan

1. The waste sector contributes approximately 4 percent of New Zealand's greenhouse gas emissions. To address this, the Government has committed through the second emissions reduction plan (ERP2) to reduce the sector's emissions by 1.8Mt CO<sub>2</sub>-e between 2026 and 2030.
2. This abatement relies heavily on reducing the volume of organic waste disposed of to landfill and improving landfill gas (LFG) capture efficiency. Achieving these outcomes requires a systems approach that leverages both regulatory tools (such as the NZ ETS and national environmental standards) and non-regulatory support options.

### Summary of decisions to date

3. Officials have provided a series of briefings progressing the policy package that delivers on the commitments in ERP2.
4. Through these briefings, the following decisions were made:
  - a. **BRF-6163 (August 2025):** The previous Minister for the Environment directed officials to undertake further policy development across four key areas: improving the effectiveness of the NZ ETS, expanding NZ ETS obligations, increasing the coverage and efficiency of LFG capture systems, and reducing organic waste.
  - b. **BRF-6828 (December 2025):** The previous Minister approved a dual engagement approach, separating formal regulatory changes (consulted via the annual 2026 NZ ETS regulatory review) from the broader package of LFG and organic waste policies and measures (to be tested via targeted engagement).
  - c. **26-BRF-00032 (March 2026):** The previous Minister and the Minister of Climate Change agreed to progress specific LFG management policies. This included confirming that updates to the Default Emissions Factor (DEF) and Unique Emissions Factor would proceed via the NZ ETS review, while proposals to broaden NZ ETS participation, introduce a 60 per cent LFG capture efficiency standard, and review NES-AQ thresholds would be tested via the sector feedback document.
  - d. **26-BRF-00169 (April 2026):** You agreed to progress non-regulatory options into the sector feedback document (previously named "white paper"), specifically policies supporting biogas production, commercial food waste recovery, and assistance for territorial authorities to deliver high-quality, value for money kerbside organics collections. This document is renamed as "sector feedback document" to ensure clear communications with stakeholders regarding its specific purpose.

### Officials are seeking your agreement to release the sector feedback document

5. Officials are seeking your agreement to release the appended sector feedback document for targeted engagement (Appendix 1).
6. The engagement will target stakeholders in the waste and resource recovery sector, food producers, processors and retailers, food rescue organisations, territorial

authorities, organic processors (such as composters and biogas producers), landfill owners and operators, ETS participants, and Iwi with whom we have waste-specific settlement obligations and who have an interest in waste.

7. Releasing this paper allows the Government to test a range of perspectives on potential measures and their feasibility, before prioritising options for further development. Engagement will consist of targeted emails to stakeholders.
8. While officials are undertaking targeted engagement, the sector feedback document will be published on the Ministry for the Environment's website. This means members of the public will be able to make submissions.
9. Officials propose a four-week targeted stakeholder engagement period commencing on 12 June 2026 to run in parallel with the formal 2026 NZ ETS regulatory review. Running these concurrently ensures that stakeholders can evaluate the Government's approach holistically.

### Proactive release of supporting documents

10. Alongside the sector feedback document, officials are seeking your agreement to release the documents listed in Table 1, below, with redactions applied under the Official Information Act 1982. The proposed redactions are outlined in Table 1.

Table 1: List of documents proposed for proactive release and proposed redactions where applicable.

Document title	Proposed redactions
<b>BRF-6163 Options to reduce emissions from organic waste</b>	None.
<b>BRF-6828 Progressing organic waste emissions reduction policies and initiatives</b>	None.
<b>26-BRF-00032 Implementing landfill gas management actions in the second emissions reduction plan</b>	None.
<b>26-BRF-00169 Biogas and other policy options to reduce emissions from organic waste</b>	s 9(2)(b)(i) [redacted] as these are commercially sensitive (s9(2)(b)) and under active consideration (s9(2)(f)(iv)) under the Official Information Act 1982.
<b>26-BRF-00994 Agreement to release landfill gas reduction and organic waste sector feedback document and supporting advice for targeted engagement</b>	None.

11. In addition to proactively releasing advice, officials have scheduled the documents outlined in Table 2 below to be published on our website at the commencement of consultation.

Table 2: List of supporting documents scheduled to be published on the Ministry for the Environment website.

Document title	Document description
<b>Landfill Gas Management – Final Report</b> (Eunomia on behalf of the Ministry for the Environment)	This report provides independent technical advice on potential policy interventions to improve landfill gas (LFG) capture and management across landfills in New Zealand. It assesses current operational efficiencies, reviews international best practice, and develops recommendations for regulatory, economic, and informational measures.
<b>Waste policy options CBA: Options to reduce waste emissions</b> (Martin Jenkins on behalf of the Ministry for the Environment)	This report presents an indicative cost benefit analysis of proposed regulatory and non-regulatory interventions to reduce greenhouse gas emissions from the waste sector. It evaluates the potential economic, environmental, and social impacts of options relating to organic waste management and landfill gas capture to help guide early policy development and prioritise options for implementation.
<b>Review of Activity Standards in National Environmental Standards for Air Quality</b> (Emissions Impossible on behalf of the Ministry for the Environment)	This report reviews the activity standards within the National Environmental Standards for Air Quality (NES-AQ), evaluating the effectiveness of regulations for landfill gas emissions and waste incineration. It recommends retaining most prohibitions while strengthening controls, such as expanding bans on harmful burning, tightening wood burner and landfill gas standards, and phasing out high-pollution heating.

12. Releasing these documents as a package allows the sector and the public to fully understand the policy evolution, economic and scientific rationale, and the current evidence base driving the options presented in the sector feedback document. This ensures stakeholders are best placed to provide informed, high-quality feedback.

## Next steps

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13. Subject to your agreement, officials will release the sector feedback document on 12 June 2026 and commence a four-week targeted engagement period. During this period, we will proactively reach out to targeted stakeholders to gather practical insights on the feasibility of the proposed policies.
14. Subject to your agreement, the sector feedback document will include the foreword attributed to yourself, with your photo and signature. This foreword gives the context of the engagement, and flags your interest in high-quality sector engagement. Officials

will work with your office to refine the wording of the foreword as needed. If you do not agree, the foreword will be attributed to the Secretary for the Environment instead.

15. Proactive release documents and commissioned publications will be published on the Ministry's website before engagement opens.
16. Officials will report back to you following submission analysis in August. This report will provide a summary of the submissions received and seek your direction on which policy options to progress. Regulatory proposals will require a subsequent, formal public consultation process before final policy advice can be provided. In parallel, the Minister for Climate Change will be making decisions regarding the 2026 NZ ETS regulatory review consultation and will be reporting to Cabinet to seek delegated authority. You will be copied into the relevant briefings for your information as this process advances.
17. If NES-AQ actions are progressed following this sector feedback document, this will require a separate decision from the Minister Responsible for RMA Reform to include these in public consultation on national standards, which is currently anticipated to take place in 2027.

## Appendices

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**Appendix 1:** Sector Feedback Document - Have your say on options to reduce emissions from organic waste

**Appendix 2:** BRF-6163, BRF-6828, 26-BRF-00032, and 26-BRF-00169 with redactions

## **Appendix 1: Sector Feedback Document - Have your say on options to reduce emissions from organic waste**

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**Appendix 2: BRF-6163, BRF-6828, 26-BRF-00032, and 26-BRF-00169 with redactions**

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