



# Te panoni i te hangarua

## Transforming recycling

Summary of submissions



Ministry for the  
**Environment**  
*Manatū Mo Te Taiao*



**Te Kāwanatanga o Aotearoa**  
New Zealand Government

## Disclaimer

The information in this publication is, according to the Ministry for the Environment's best efforts, accurate at the time of publication. The Ministry will make every reasonable effort to keep it current and accurate. However, users of this publication are advised that:

- The information does not alter the laws of New Zealand, other official guidelines, or requirements.
- It does not constitute legal advice, and users should take specific advice from qualified professionals before taking any action based on information in this publication.
- The Ministry does not accept any responsibility or liability whatsoever whether in contract, tort, equity, or otherwise for any action taken as a result of reading, or reliance placed on this publication because of having read any part, or all, of the information in this publication or for any error, or inadequacy, deficiency, flaw in, or omission from the information in this publication.
- All references to websites, organisations or people not within the Ministry are for convenience only and should not be taken as endorsement of those websites or information contained in those websites nor of organisations or people referred to.

This document may be cited as: Ministry for the Environment. 2023. *Transforming recycling: Summary of submissions*. Wellington: Ministry for the Environment.

Published in June 2023 by the  
Ministry for the Environment  
Manatū Mō Te Taiao  
PO Box 10362, Wellington 6143, New Zealand  
[environment.govt.nz](https://environment.govt.nz)

ISBN: 978-1-99-102586-9 (online)

Publication number: ME 1737

© Crown copyright New Zealand 2023

# Contents

Executive summary	8
Tiro whānui – Overview	18
1. Introduction	19
1.1. Public consultation	19
1.2. This report	19
2. Methodology	20
2.1. Limitations of the analysis process	20
3. Summary of submissions	21
3.1. Demographics	22
4. Overall themes and key messages	23
4.1. Keep it simple	23
4.2. Implementation considerations	23
4.3. Future focus	24
4.4. Moving towards a circular economy	24
4.5. Education needed	24
4.6. Consultation with communities	24
4.7. Embed Te Tiriti and te ao Māori approaches	25
Part 1: Kaupapa whakahoki ipu – Container Return Scheme	26
5. Support for a NZ CRS	27
5.1. Support for implementation of a NZ CRS	27
5.2. Support if key scheme design criteria were different	28
6. Container Return Scheme finances	29
6.1. Proposed refund amount	29
6.2. Receiving refunds for containers	30
6.3. Variable scheme fees	33
6.4. Proposed financial model	35
7. Beverage containers	37
7.1. Proposed definition of a beverage	37
7.2. Proposed definition of an eligible beverage container	38
7.3. Beverage container materials for inclusion in a NZ CRS	39
7.4. Other container material types	41
7.5. Alternative beverage container packaging types	41

8.	Beverage types proposed for exemption	43
8.1.	Fresh milk exemption	43
8.2.	Investigating commercial recovery of fresh milk beverage containers	45
8.3.	Declaring fresh milk beverage containers a priority product	46
8.4.	Exemption of refillable beverage containers with an established return/refillables scheme	46
8.5.	Supporting the Aotearoa New Zealand refillables market	48
8.6.	Promoting and incentivising the uptake of refillable beverage containers	49
8.7.	Other beverage packaging types or products for exemption	50
9.	Beverage container size	52
9.1.	Size of eligible beverage containers to be 3 litres and smaller	52
10.	Beverage container lids	53
10.1.	Returning containers with lids on	53
10.2.	Alternative means to capture and recycle beverage container lids	54
11.	Return network	55
11.1.	A mixed-return model with mandated retail participation	55
11.2.	Preferred locations for returning containers	57
11.3.	Minimum store thresholds for beverage retailers	60
11.4.	Shop-floor-size requirements for rural retailers	61
11.5.	Exemptions for retailer participation	62
12.	Scheme performance	64
12.1.	Not-for-profit, industry-led NZ CRS	64
13.	Implementation	66
13.1.	Recovery targets for a NZ CRS	66
13.2.	Reviewing the scheme design	67
14.	Any other comments	68
	Part 2: Te whakapiki i te hangarua paeara ā kāinga – Improvements to household kerbside recycling	70
15.	Proposal 1: standard set of materials	71
15.1.	Standard set of materials from households collected at kerbside	71
15.2.	Councils collecting different material types	72
15.3.	National consistency	73
15.4.	Proposed items for a standard set of materials	74
15.5.	Proposed items that should be excluded	76
15.6.	Additional materials for inclusion	76
15.7.	Regular review of the standard set of materials	78

15.8.	Considerations when determining future classes of materials	79
15.9.	Decision-maker for new materials	81
15.10.	Network of convenient locations	82
16.	Proposal 2: All urban populations should have kerbside food-scrap collections	83
16.1.	Diverting food and garden waste	83
16.2.	Weekly kerbside food scraps collection	84
16.3.	Mandatory food-scrap collections	85
16.4.	Council role in household garden waste diversion	86
16.5.	Phased approach to kerbside food-scrap collections	87
16.6.	Councils with access to suitable existing infrastructure begin food-scrap collections from 2025	88
16.7.	Councils without access to suitable existing infrastructure begin food scrap collection in 2030	89
16.8.	Additional facilities with current capacity and resource consent	90
16.9.	Additional materials excluded from kerbside food and garden bins	91
16.10.	Considerations for non-food products or packaging to be accepted	91
16.11.	Materials included in kerbside food and garden bins	92
17.	Proposal 3: Reporting on household kerbside collections offered by the private sector	94
17.1.	Understanding how well kerbside collections are working	94
17.2.	Private sector reporting on private household kerbside collections	95
17.3.	Publishing information for transparency	96
17.4.	Private sector reporting on private household kerbside collections	97
18.	Proposal 4: Setting targets/performance standards for councils	99
18.1.	Minimum diversion rates for kerbside recycling services	99
18.2.	Minimum diversion rate of 50 per cent for dry recyclables and food scraps	101
18.3.	Achieving minimum diversion rate by 2030	102
18.4.	High-performance target for overall collection performance	103
18.5.	Aspiring to a 70 per cent target	104
18.6.	Consequences for not meeting minimum performance standards	105
19.	Proposal 5: Separate collection of glass and paper/cardboard	106
19.1.	Separate collection of glass or paper/ cardboard at kerbside	106
19.2.	Implementation of separate glass or paper/cardboard collection	107
20.	Proposal 6: All urban populations should have access to kerbside dry recycling	109
20.1.	Councils offering kerbside recycling services	109
20.2.	Services offered at a minimum to all urban areas	111
20.3.	Implementation for councils without council-funded kerbside recycling	113

20.4. Research, technical support or behaviour change initiatives	114
Part 3: Te whakawehe i ngā para kai ā-pakihi – Separating business food waste	116
21. Source separation of food waste is phased in for all businesses	117
21.1. Commercial businesses diverting food waste from landfills	117
21.2. Commercial businesses diverting food waste from landfills by 2030	118
21.3. Phasing in depending on access to suitable processing facilities	119
21.4. Shorter lead-in times for businesses that produce food	121
21.5. Exemptions for businesses	122
21.6. Support for businesses	123
Appendix 1: Support for specific proposals	125
Appendix 2: Glossary	144

# Tables

Table 1:	Quantification of submitters	9
Table 2:	Submissions format and numbers	21

# Figures

Figure 1:	How would you like to receive your refunds for containers? Short form submissions	31
Figure 2:	How would you like to receive your refunds for containers? Detailed submissions	31
Figure 3:	How would you like to receive your refunds for containers? Combined short form and detailed submissions	32
Figure 4:	Where would you find it easiest to return eligible beverage containers? Short form submissions	58
Figure 5:	Where would you find it easiest to return eligible beverage containers? Detailed submissions	58
Figure 6	Where would you find it easiest to return eligible beverage containers? Combined short form and detailed submissions	59
Figure 7:	Items which should be included in the standard set of materials that can be recycled in household kerbside collections. Combined short form and detailed submissions	75
Figure 8:	What should be considered when determining whether a class of materials should be accepted at kerbside in the future?	80

# Executive summary

## Introduction

The Ministry for the Environment (the Ministry) commissioned Allen + Clarke to analyse submissions received on the *Transforming Recycling – Te panoni i te hangarua* consultation.<sup>1</sup> The consultation document set out the Ministry's proposals for:

- a New Zealand Container Return Scheme (NZ CRS) that incentivises people to return their empty drink containers for recycling
- improving kerbside recycling so New Zealanders can recycle the same materials all around the country and have access to a food-scrap bin at kerbside
- separating businesses' food scraps from general waste to reduce greenhouse gases and put the scraps to positive use.

These are three foundational and coordinated initiatives that would lift the performance of Aotearoa New Zealand's resource recovery and waste system, and help the country move toward a low-emissions, circular economy. Together and individually, these proposals are designed to shift how New Zealanders value waste materials, and to improve our existing recycling and waste systems. The proposals are a culmination of many years' work and are part of the Ministry's wider waste programme.

This report summarises views submitted during the ten-week consultation period, which started on 13 March and ended on 22 May 2022.

The report is in three parts:

- **Part 1:** *Kaupapa whakahoki ipu – Container Return Scheme*
- **Part 2:** *Te whakapiki i te hangarua paeara ā-kāinga – Improvements to household kerbside recycling*
- **Part 3:** *Te whakawehe i ngā para kai ā-pakihi – Separating business food waste*

[Appendix 1](#) provides the level of support for the proposals, drawn from submissions to the Citizen Space platform, via email and post. [Appendix 2](#) provides a glossary.

## Submissions received

The Ministry received 6,399 submissions on the consultation document. Submissions were tagged against a framework based on themes and questions in the consultation document. The Ministry also held five webinars and two workshops on the proposals to transform the way we recycle and reduce litter in our environment.

---

<sup>1</sup> Ministry for the Environment. 2022. *Transforming recycling: Consultation document*. Wellington: Ministry for the Environment.



## Quantifying submitters

When referring to submitters, the report quantifies support for positions based on the classifications in Table 1. These classifications relate to the number of responses received to each question – that is, the same terms are used relative to the proportion of responses to that question. This means that regardless of whether there were 100 or 1,000 responses to a question, the same terminology will be used. For example, the statement ‘most submitters were supportive of implementing a NZ CRS’ indicates that 76 to 99 per cent of the submitters who answered [Question 28](#) agreed with the implementation of a NZ CRS.

An indication of the numbers and percentages<sup>2</sup> of responses for each section is provided in [Appendix 1](#), and in tables and graphs at the beginning of each question in Parts 1, 2 and 3. These tables and graphs display data from all detailed submissions and short-form submissions that were received via Citizen Space, email and post (including responses forwarded from the Hastings District Council). Submitters indicating support for pro forma submissions are reported separately throughout the document where relevant and are not included for the purposes of the classifications referred to in table 1 below.

**Table 1: Quantification of submitters**

Classification	Definition
None	0% of submitters on this topic
Few	1%–25% of submitters on this topic
Some	26%–50% of submitters on this topic
Many	51%–75% of submitters on this topic
Most	76%–99% of submitters on this topic
All	100% of submitters on this topic

## Container return scheme

Most submitters that responded directly to the survey were supportive of implementing a container return scheme in Aotearoa New Zealand (NZ CRS). Most submitters said this would help Aotearoa New Zealand transition to a low-emissions and circular economy, change consumer and manufacturer behaviours, and result in less waste. Many submitters also raised suggestions as to how the proposed NZ CRS could be improved. A further 3,996 individuals indicated support for the Kiwi Bottle Drive pro forma submission, which was supportive of a NZ CRS.

## Scheme finances and 20-cent deposit rate

Most submitters that directly responded to the survey agreed with the proposed deposit refund amount of 20 cents and said it struck the right balance between incentivising people to return containers and not overburdening people with more expensive beverages. However, many businesses and industry associations were concerned that the 20-cent deposit refund amount would increase the cost of living and add costs to their operations. These businesses sought a 10-cent deposit refund. A further 3,979 Kiwi Bottle Drive submitters supported the 20-cent deposit rate.

---

<sup>2</sup> Percentages have been rounded to the nearest whole number

Most submitters preferred electronic funds transfer and having access to all options to receive deposit refunds.<sup>3</sup> Submitters that supported the Kiwi Bottle Drive pro forma submission indicated that cash and electronic transfer should be possible at all return sites, with donations and vouchers as an optional extra.

Most submitters supported including variable scheme fees (eco-modulation). Many submitters explained that this could incentivise the use of easier-to-recycle packaging and increase the circular potential of packaging. Some submitters agreed that eco-modulation<sup>4</sup> was logical and wanted circular systems to be incentivised. However, a few submitters disagreed with glass being considered less recyclable than material such as liquid paperboard (LPB), noting that clearer definitions were needed.

## **Beverage container materials**

Most submitters agreed with the proposed definitions of a 'beverage' and an eligible 'beverage container'. Many submitters agreed with the proposed scope of beverage container material types to be included in the NZ CRS.<sup>5</sup> A further 3,982 Kiwi Bottle Drive submitters supported for a broad scope of containers. However, a few disagreed, with some saying the scope was too broad and some saying it was too narrow. Most submitters agreed that glass, plastic and metal should be included in the scheme. Many agreed that LPB should also be included. Other submitters said that LPB should not be included, to encourage alternative and more sustainable packaging development. Others were concerned about a current lack of infrastructure and the complex systems needed to recycle LPB. Most submitters agreed with the proposal that alternative container packaging types could be considered on a case-by-case basis.

## **Exempting fresh milk containers**

Many submitters that responded directly to the survey opposed the proposal to exempt fresh milk from a NZ CRS. Submitters did not understand why milk containers would be exempt and considered that it was unfair to subsidise the dairy industry, which is a large emitter of pollution. Submitters were concerned that exempting milk would make the scheme more confusing and less effective, and would compromise the opportunity to increase recycling of a widely consumed product. An additional 3,978 Kiwi Bottle Drive submitters indicated that they opposed milk being exempt from the scheme.

If milk were not included in the NZ CRS, most submitters supported the Ministry investigating how to target the commercial recovery of fresh milk beverage containers through other

---

<sup>3</sup> Options for deposit refunds include cash, electronic funds transfer, vouchers, donations, other options, and access to all options.

<sup>4</sup> Eco-modulation is a variable fee pricing mechanism that can be used to improve waste minimisation and circular-economy outcomes. A fee is modulated to reflect the costs of recycling a given product, and the fee typically increases when a product is hard to recycle. Equally, products that are easy to recycle have lower scheme fees, encouraging producers to use recyclable materials. The eco-modulation of fees incentivises producers to improve the environmental sustainability of their product design. *Transforming recycling*, note 1 above, p 36.

<sup>5</sup> The consultation document proposed that all single-use beverage containers would be in scope of the scheme and eligible for a refund if they are made from one or more of the following frequently bought beverage container materials: glass, plastic (PET, HDPE and PP only, and recyclable bio-based HDPE and PET), metal (eg, aluminium, steel, tinplate and bimetals) and LPB (the only composite product proposed). *Transforming recycling*, note 1 above, p 40.

means. However, many preferred to see fresh milk included in a NZ CRS, for consistency and simplicity. There were mixed views on the proposal for the Ministry to investigate declaring milk containers a priority product and including them within another scheme.

Some submitters, including councils and supermarkets, said plant milks were staple and necessary products for many and, as such, should also be exempt.

## **Refillable beverage containers**

Most submitters that responded directly to the survey agreed with the proposal to exempt refillable containers within their own established scheme from a NZ CRS. Some submitters wanted to ensure any refillable containers could be recycled at the end of their lives, and that containers considered in future would also be recyclable. Most submitters agreed that there should be a requirement for the NZ CRS to support the refillables market (eg, a refillable target), and there were mixed views on whether a refillables target would work. Submitters that supported the Kiwi Bottle Drive pro forma submission proposed that reusable containers should be included in the Container Return Scheme, or that companies using reusable containers should be able to “opt-in” to the system, so they can access the scheme’s collection and return infrastructure.

Submitters suggested a broad range of ways that the Government could promote and incentivise the uptake of refillable systems, including tax breaks and subsidies, an eco-tax on single-use packaging, financial assistance, infrastructure (public refilling locations, eco-cleaning and washing), support to refillerries, and education campaigns.

Submitters generally did not consider any other beverage packaging types or products should be exempt, as the success of the scheme depends on it being simple and having a broad scope. Some submitters did suggest a range of other products that should be exempt from a NZ CRS, such as glass bottles, plant milks, and medicinal and nutritional drinks and pouches.

## **Beverage container size and lids**

Most submitters support the proposal that eligible beverage containers would be three litres or smaller. Submitters thought this would capture most highly consumed beverages and container supermarket sales, and that the infrastructure needed to process containers of this size was mostly available.

Most submitters agreed that consumers should be encouraged to put lids back on their containers before returning them for recycling, as they were a common and dangerous litter type that could harm marine life and cause broader environmental harm. To increase compliance, some submitters suggested encouraging designing beverage containers where the lids stay attached, or not allowing refunds if a container is returned without a lid. There were concerns about consistent messaging with kerbside recycling – many of these submitters suggested working on the collection of lids as a part of the proposed NZ CRS recovery network.

There were also concerns about the current recycling infrastructure being able to process containers with their lids attached. Submitters thought that technology would need to be funded and developed to recover and recycle lids.

## **Container return network**

Most submitters agreed that a NZ CRS should use a 'mixed-return model' with a high degree of mandated retail participation. However, many business/industry submitters did not support a high degree of mandated retail participation and wanted a 50/50 split between retail and supermarkets. Most submitters considered a diverse, convenient return network with containers being returned at all available locations (especially supermarkets) an essential part of a successful NZ CRS. Other suggestions for return locations were dairies, reverse vending machines (RVMs), schools, home collections or mobile return points for rural populations of less than 1,000, universities, parks, cafes and petrol stations. The Kiwi Bottle Drive pro forma submission supported a mixed model network but promoted having more depots than set out in the proposals.

## **Minimum store threshold and exemptions**

Most individual submitters supported a minimum store threshold, stating that it needed to be easy for consumers to access nearby locations. Submitters supported a range of suggested minimum store size thresholds, with most supporting over 100 m<sup>2</sup> and some supporting 200 m<sup>2</sup> and 300 m<sup>2</sup>. Others did not support a minimum store threshold, as they disagreed with the premise of mandated return to retail.

There were mixed views on whether shop-floor-size requirements should differ between rural and urban locations. Some submitters agreed that there should be a lower size threshold for rural retailers. Most submitters agreed that there should be exemptions for retailer participation in a mixed-model return network.

## **Financial model and targets**

Most submitters agreed with the proposed deposit financial model for a NZ CRS. Many of these submitters said that a deposit financial model provided a good incentive for households to participate in a NZ CRS and was more equitable than a refund model.

## **Scheme management and governance**

Most submitters agreed with a NZ CRS that would be a not-for-profit, industry-led scheme. Many of these submitters considered that the scheme should be not for profit, but did not agree with it being industry led. These submitters were concerned that an industry-led scheme would result in a small number of larger associations dominating decision-making. The Kiwi Bottle Drive pro forma submission did not support the scheme being industry led and supported a comprehensive Tiriti-led scheme.

## **Recovery targets**

Most submitters supported proposed recovery targets for a NZ CRS of 85 per cent by year 3, and 90 per cent by year 5. Submitters noted that ambitious or aspirational targets would be necessary to make significant progress towards positive behaviour change and a circular economy. Most submitters agreed that the scheme design should be reviewed if it did not meet its recovery targets.

## Improvements to household kerbside recycling

Submitters were largely supportive of proposed changes to kerbside recycling in Aotearoa New Zealand. Many submitters commented on the importance of household kerbside recycling and the positive changes that could potentially come from this, which included helping people engage more effectively with recycling, reducing preventable environmental harm, and moving toward a more circular economy.

Proposals	Combined total (where applicable)
Collecting a standard set of materials	95%
All councils to provide household kerbside food scraps collections	91%
All councils to provide household kerbside dry recycling collections	98%
Reporting on the performance of kerbside collections	96%
Performance standards for household kerbside collections	88%
Separating glass/paper from other recyclables	90%

### Proposal 1: Standard set of materials

Most submitters (91 per cent) agreed that a standard set of materials should be collected for household kerbside recycling, and that regulation would be required. However, some considered that only a minimum set of materials should be standardised, and others wanted additional materials added to the core list.

Submitters noted that having a standard set of materials collected for household kerbside recycling would reduce confusion and streamline systems. However, they considered that local government would require support to implement a standard set of materials.

Most submitters agreed that it was confusing for councils to collect different material types. A few did not agree, stating that most people recycle within their own region and therefore do not need to know what is happening in other regions. Most submitters did not agree that consistency could be achieved voluntarily and said that regulation would be required.

Most submitters said that all materials in the standard set of materials listed should be collected in household kerbside collections.<sup>6</sup> Some suggested that this standard set of materials should be the minimum and, where there are opportunities for local councils to collect more, they should be able to.

Some submitters suggested excluding pizza boxes (due to contamination), and a few suggested excluding coloured polyethylene terephthalate (PET) and PET meat trays (due to lack of end markets). Additional materials suggested to be included in a standard set of materials for kerbside collection were:

- LPB
- aerosol cans
- soft plastics

---

<sup>6</sup> This included glass bottles and jars, paper and cardboard, pizza boxes, steel and aluminium tins and cans, plastic bottles 1 (PET) and 2 (HDPE), plastic containers and trays 1 (PET) and 2 (HDPE), and plastic containers 5 (PP). *Transforming recycling*, note 1 above, p 71.

- other plastics
- polystyrene
- aluminium foil and trays
- electronics and batteries
- toothpaste tubes.

A few submitters said these materials should be captured, as they are substantial contributors to recycling contamination, litter and landfill waste. However, most submitters agreed that, in addition to kerbside recycling, there should be a network of convenient recycling locations where these materials could be taken and recycled.

Some submitters said that kerbside collections should be consistent with the proposed NZ CRS in relation to LPB and lids.

Most submitters agreed that the standard set of materials should be reviewed regularly and, provided certain conditions are met, new materials should be added. Some submitters suggested allowing materials to be removed, as well as added, through the review process.

When considering whether a class of materials should be accepted at kerbside in future, submitters said that considering whether end-market solutions are circular, minimising environmental harm, viable processing technologies and sustainable end markets would be useful criteria. When asked who should decide how new materials are added to the list, the preferred option was Ministry staff in consultation with a reference stakeholder group.

## **Proposal 2: Kerbside food-scrap collection**

There was general agreement that food waste should be diverted from landfill (91 per cent), although there were mixed views as to how this should be done. Most submitters agreed that food and garden waste should be diverted from landfills, and most submitters were in favour of the proposal for councils to offer kerbside food-scrap bins.

Most submitters, including most councils, agreed that councils should play a role in increasing the diversion of household garden waste from landfills. However, some council submitters sought information on how the proposal would be funded and were concerned that it would result in rates increases.

Most submitters agreed that all councils should offer a weekly kerbside scraps collection. However, some submitters suggested that food scraps and green waste could be combined into one service. Some submitters also recommended tailoring the proposed food-scrap bin scheme to reflect the different areas people live in (either rural or urban). However, some local government submitters were concerned about the cost of implementing a collection and the availability of infrastructure. A few submitters expressed concerns that people who already minimise their organic waste through home composting may be penalised by paying for a service they do not need.

Some submitters suggested that the kerbside scheme would benefit from an education programme.

Most submitters agreed that kerbside food-scrap collections should be mandatory in towns with more than 1,000 people and in smaller settlements that have existing kerbside collections. Some councils suggested flexibility for rural areas and that for towns with under

1,000 people, the council should be able to choose whether to offer a kerbside food-scrap service, even if it already had a kerbside recycling service.

Most submitters agreed with a phased approach to the roll-out of kerbside food-scrap collections, noting that it would allow time for markets and the appropriate infrastructure to develop. Councils mostly agreed with a phased approach. Some councils raised concerns due to the resourcing and other aspects required to successfully implement kerbside food-scrap collections. There were also some concerns about the complexity and logistical issues of such a system.

Most submitters agreed that councils with access to suitable existing infrastructure should have until 2025 to deliver food-scrap collections. Some submitters wanted this to happen earlier than 2025. However, local government submitters had mixed views, with some agreeing with a 2025 deadline and others concerned that it was too close. Most submitters did not agree that councils without existing infrastructure should have until 2030 to deliver food-scrap collections, as some thought it should be even sooner. Some local government submitters agreed with the 2030 timeframe, while a few said that it was also too short.

Most submitters, including most councils, agreed that councils should play a role in increasing the diversion of household garden waste from landfills. There were a range of suggestions as to what councils could and should do.

There were mixed views on which materials should be included in kerbside food and garden bins. The most common items suggested by some submitters to include in kerbside food and garden bins were compostable plastic products and packaging, kitchen paper towels/hand towels/serviettes, and newspaper and shredded paper. However, some submitters suggested excluding the same materials.

Most submitters said that all factors listed in the consultation document needed to be taken into consideration for non-food products or packaging to be accepted in a food-scrap bin or a food-and-garden-waste bin. The three priority considerations were that:

- products meet Aotearoa New Zealand standards for compostability
- products are clearly labelled so that they can be distinguished from non-compostable products
- products are certified in their final form to ensure they do not pose a risk to soil or human health.

### **Proposal 3: Reporting**

There was overwhelming support (100 per cent) for waste data to be collected and published online, with numerous suggestions as to additional information which would also be useful.

Most submitters, including recyclers, agreed that it was important to understand how well kerbside collections were working. There was general support for the proposal that the private sector should also report on their household kerbside collections.

Most submitters, including all councils, agreed that information should be published online for transparency, noting that it would provide an understanding of the scale and impact of the waste being generated and the impacts of proposed changes.

Most submitters said that other information should be published online, apart from diversion and contamination rates (eg, carbon emissions, contamination levels, information about where materials are processed, and end uses).

#### **Proposal 4: Performance standards**

Submitters generally agreed (88 per cent) that there should be performance standards for kerbside collections, though there were mixed views on how this should be measured.

Most submitters, including councils, agreed that kerbside recycling services should have to achieve a minimum diversion rate. Some disagreed with the measure suggested, and proposed alternatives such as measuring total waste generated or contamination levels. Others expressed concerns about achieving a minimum diversion rate.

Many submitters were in favour of the proposed minimum diversion rate of 50 per cent for the diversion of dry recyclables and food scraps. Where submitters disagreed, some considered it was too high, too low, or were unsure where it should be set.

There were mixed views on the proposal that territorial authorities have until 2030 to achieve the minimum diversion rate. Many submitters disagreed, explaining that the timeframe should be much shorter. Conversely, some local government submitters disagreed, as they said they required more time.

Most submitters supported the proposal to set high-performance targets for overall collection performance. Some local government submitters said that there should be a greater focus on helping councils who need more support. Most submitters were in favour of a 70 per cent diversion rate target; however, some were concerned with smaller councils' ability to reach the target.

Many submitters proposed that further support should be provided to territorial authorities that do not meet the minimum performance standards. Some submitters said that fines should be used, while a few suggested withholding levies.

#### **Proposal 5: Fibre or glass separate**

Most submitters agreed that glass should be collected separately to paper and cardboard, stating that it is necessary and best practice to separate these materials. A few submitters raised concerns about the implementation of this proposal, such as current lack of funding and infrastructure, availability and safety of manual labour workforce, and the consequences of increased numbers of trucks on the road.

Most submitters agreed that if separation were to be implemented, it should begin immediately.

#### **Proposal 6: Council kerbside services**

Most submitters agreed that all councils should offer kerbside recycling collections for dry recycling. Most agreed that, at a minimum, all urban centres with a population of more than 1,000 should have access to council-funded kerbside recycling services. Moreover, most agreed that councils without any council-funded kerbside recycling collections should implement these collections within two years of their next Waste Management and Minimisation Plan (WMMP).



Some submitters said the timeframe should be extended, to give councils time to plan and implement a new service, while others said the timeframe should be shorter and independent from the WMMP. Submitters stated that funding, education and resources, and clear labelling of recyclable packaging would be needed to help to implement the kerbside work programme.

## **Proposals on business food waste**

Most submitters supported the proposal for commercial businesses to separate food waste from general rubbish to divert food waste from landfills.

They considered this would encourage businesses to reduce and prevent food waste, reduce emissions, and help to create a circular economy. Most submitters did not support any businesses being exempt and said that all businesses should play their part alongside households. Those submitters who did not agree were concerned about the requirement to include all businesses, or were concerned about the associated costs. Some suggested small businesses and businesses that did not produce food should be exempt.

Most submitters agreed with the proposal for commercial businesses to be diverting food waste from landfills by 2030. Some considered this should happen sooner, stating that many bigger businesses would likely already have the funds and access to infrastructure necessary to make this change. Some submitters wanted more information about how 'commercial business' was defined.

Most submitters agreed that separation should be phased in, depending on access to suitable processing facilities. However, some submitters, including businesses, reiterated that businesses that already have this infrastructure available to them should start sooner than 2030.

Submitters were generally supportive of a shorter lead-in time for businesses that produce food. They said it would be easier for food producers, and they were likely to already be separating food waste or planning how to do this.

Businesses would require support to implement these proposals, including education, funding, bins, collection services and processing infrastructure.

# **Tiro whānui – Overview**

# 1. Introduction

## 1.1. Public consultation

In March 2022, Minister for the Environment David Parker announced the *Transforming recycling – Te panoni i te hangarua* consultation proposals were open for public consultation. The consultation document outlined the Ministry's proposals for:

- a New Zealand container return scheme (NZ CRS) that incentivises people to return their empty drink containers for recycling
- improving kerbside recycling so New Zealanders can recycle the same materials all around the country and have access to a food-scrap bin at kerbside
- separating businesses' food scraps from general waste to reduce greenhouse gases and put the scraps to positive use.

## 1.2. This report

This draft report summarises the submissions received during the public consultation, in three parts.

- **Part 1: Kaupapa whakahoki ipu – Container Return Scheme**
- **Part 2: Te whakapiki i te hangarua paeara ā kāinga – Improvements to household kerbside recycling**
- **Part 3: Te whakawehe i ngā para kai ā-pakihi – Separating business food waste**

[Appendix 1](#) provides the level of support for the proposals, drawn from submissions to the Citizen Space platform, via email and post (including submissions received via the Hastings District Council). Where relevant, numbers of submitters that supported the Kiwi Bottle Drive pro forma submission are reported separately throughout the document. [Appendix 2](#) provides a glossary.

## 2. Methodology

The Ministry received submissions through Citizen Space (the Ministry's consultation hub), email and post. These were collated and uploaded to the Ministry's submissions-tagging software, Croissant, and tagged against a taxonomy based on themes and the questions in the consultation document. From this, the populated taxonomy was exported to software that was used to inform the analysis for this report.

The following submissions were dealt with as follows.

- Kiwi Bottle Drive and Greenpeace collectively provided the Ministry with details of individuals who signed its pro forma submission (3,696 submitters), as well as identifying bespoke submissions using its form that had unique content (300 submissions). The pro forma submission was drafted to respond to the short form proposals for a NZ CRS only. These submissions were included in the final submission number and responses are reported separately throughout the report.
- Hastings District Council included a survey of 95 community members at the end of its submission. The survey asked a small number of questions relevant to the Kerbside, and NZ CRS proposals. This survey was added to the total submission number and responses included when analysing responses to the detailed survey.
- One submission was received via post. This was transcribed, included in the final submission number, and included when analysing responses to the detailed survey.
- The Chia Sisters submitted a form submission with 452 signatures, including from 18 global and national environmental leaders, 13 NZ food and beverage companies and 421 members of the public. This submission was only relevant to two submission questions relevant to the NZ CRS proposals, relating to refillable containers (Question 13 and 14 of the detailed survey). The 452 signatories have been included in the final submission number, and numbers reported separately where relevant.

### 2.1. Limitations of the analysis process

This report has integrated responses from across the submission avenues, where possible. The majority of responses were individual submissions (6,087 from the short-form and detailed submissions, as well as the Hastings District Council survey and pro forma submissions). Most of these were short and focused on high-level views or specific priorities. 312 submissions were received from organisations. These tended to be longer and more detailed, especially in relation to more technical questions within the discussion document. In general, the more technical the subject matter, the fewer the responses received. Individual submitters largely responded to the short-form questionnaire, so there is a representation bias of organisations such as industry associations, businesses, and local government in the detailed questionnaire.

This report has integrated responses from across those submitted in Citizen Space, via email, post and from those indicating agreement with pro forma submissions. Submissions on Citizen Space included information on regions, local councils of submitters, individual or organisations (and, in the case of organisations, name and type) and area. This data was not always collected for some other submissions (ie, when submissions were made outside of Citizen Space and demographic information was not provided by the submitter).

### 3. Summary of submissions

Overall, the Ministry received 6,399 submissions across four main formats, as presented in table 2. These submissions included individuals, community groups, iwi, companies and sector organisations, industry associations, local government, District Health Boards (DHBs<sup>7</sup>) and non-governmental organisations (NGOs). Therefore, these submissions represent more New Zealanders than the number received. The majority of submissions were submitted on behalf of individuals.

Some submissions included supporting documents, which were considered as part of the analysis.

**Table 2: Submissions format and numbers**

Format of submissions	Submissions
<b>Short-form submissions</b> The Citizen Space 'quick submission' contained three short-form questionnaires. <ul style="list-style-type: none"> <li>• Container Return Scheme short form</li> <li>• Kerbside Recycling short form</li> <li>• Separation of Business Food Waste short form</li> </ul> These are collectively referred to as 'short-form submissions'.	1,518 short-form submissions
<b>Detailed, email and PDF submissions</b> The Citizen Space 'detailed submission' had 67 questions across the three proposal areas. The Ministry also received long-form detailed submissions via email or uploaded as an attachment into Citizen Space. These are collectively referred to as 'detailed submissions'.  The one handwritten and transcribed submission and the 95 survey responses included in the Hastings District Council submission were also treated as detailed submissions.	433 detailed submissions
<b>Pro forma submissions</b> Some of the submissions received were form submissions: <ul style="list-style-type: none"> <li>• Kiwi Bottle Drive and Greenpeace<sup>8</sup></li> <li>• The Opportunity for a Reuse Scheme (led by Chia Sisters)<sup>9</sup></li> </ul>	4,448 form submissions <ul style="list-style-type: none"> <li>• 3,996</li> <li>• 452</li> </ul>

<sup>7</sup> Since consultation closed, the 20 DHBs were disestablished and their functions were merged into Te Whatu Ora. DHB submissions mentioned in this document are therefore associated with the former DHB entity, and do not necessarily reflect the views of Te Whatu Ora.

<sup>8</sup> This includes 3,696 pro forma submissions and 300 bespoke submissions. Referred to throughout this document as 'Kiwi Bottle Drive', noting that these submissions were garnered by Kiwi Bottle Drive and Greenpeace.

<sup>9</sup> This includes signatures from 18 global and national environmental leaders, 13 Aotearoa New Zealand food and beverage companies, and 421 members of the public.

### 3.1. Demographics<sup>10</sup>

**Individual/organisation:** The Ministry received 6,087<sup>11</sup> submissions from individuals and 312<sup>12</sup> submissions from organisations.

**Type of organisation:** Across all forms of submissions, the largest group of organisations to submit were businesses, with 137 making submissions. Businesses were followed by 45 local government submitters, 40 industry associations, 28 registered charities and 23 NGOs. A further 36 organisations were categorised as ‘other’, which included DHBs and tertiary institutions/student associations. Low numbers of submitters identified as iwi/hapū organisations, with two detailed submissions and one short form.<sup>13</sup>

**Region:** A high volume of submissions across all formats were from Auckland | Tāmaki-makaurau, Wellington | Te Whanganui-a-Tara, Canterbury | Waitaha, Otago | Ōtākou and Waikato (around 45 per cent in total). For the detailed submissions, five or fewer people submitted for each of Taranaki, Marlborough | Te Tau Ihu o Te Waka, Manawatū, Whanganui, Nelson | Whakatū, Bay of Plenty | Te Moana-a-Toi, Northland | Te Tai Tokerau, Southland | Murihiku, Tasman | Te Tai-o-Aorere, West Coast | Te Tai Poutini and Gisborne | Tairāwhiti. For the detailed submissions, three submitters were from outside of Aotearoa New Zealand, and for the short form, 128 were from outside of Aotearoa New Zealand.

**Urban vs rural:** The Ministry received 1,681 submissions from submitters who lived in an urban area – a town with more than 1,000 people (1,259 in short form and 422 in the detailed and email submissions). There were 358 submissions from submitters who lived in a semi-rural area – a town with fewer than 1,000 people (84 in short form and 274 in the detailed and email submissions), and 118 submissions from submitters who lived in a rural area (108 in short form and 384 in the detailed and email submissions).

---

<sup>10</sup> Data in this section has been drawn from Citizen Space data and where email, post and pro forma submitters responded to requests for demographic information. These numbers are approximate, as not all submitters provided demographic information, and it was not collected for all pro forma submissions.

<sup>11</sup> This count includes all submitters, including those received via Citizen Space, email, post and pro forma submitters, including 3996 individual submitters that supported the Kiwi Bottle Drive/Greenpeace pro forma and 452 Chia Sisters pro forma submissions.

<sup>12</sup> This figure includes the 13 businesses that supported the Chia Sister’s submission.

<sup>13</sup> Further submissions that spoke to how the scheme impacts Māori were received from Para Kore (and the Zero Waste Network), Ngā Rangahautira Māori Law Students’ Association, the Kiwi Bottle Drive and Greenpeace form submission and several councils.

## 4. Overall themes and key messages

A number of overall themes and key messages were repeated by submitters throughout their responses. Submitters often provided a similar or the same answer to multiple questions. Where relevant, this repetition has been retained in the body of this report. Headline and key messages are also outlined below.

### 4.1. Keep it simple

A theme that came through across many different areas of the consultation was that, in order for any of the proposed changes to be successfully implemented, they must be accessible, easy to follow and consistent.

Submitters raised this across all questions that discussed possible exemptions. Many submitters disagreed with exemption proposals such as:

- fresh milk and refillable containers from a NZ CRS
- materials such as LPB, aerosols and soft plastic from kerbside recycling
- exemptions for businesses in the separation of business food waste.

This was on the basis that exemptions can create confusion and a lack of consistency that makes it more difficult to follow proposed schemes, as there are too many different caveats to remember. Submitters considered that this could make schemes less effective in the long term.

Submitters across NZ CRS and kerbside proposals considered that standardising product labelling would be important to help consumers understand what can and cannot be recycled or returned, as part of wider efforts to reduce confusion and complexity when implementing proposals.

For similar reasons, submitters considered it important that any NZ CRS and improvements to kerbside recycling should be aligned. Submitters noted that materials like glass, container lids and LPB could potentially be treated differently across NZ CRS and kerbside proposals and wanted them to be included in both for consistency.

### 4.2. Implementation considerations

Across the consultation, submitters raised considerations about the implementation of the proposals. Many submitters wanted implementation to be faster, citing a level of urgency required to adequately respond to climate change. Some submitters focused on aligning the scheme with existing plans and strategies, such as WMMPs, and the emissions reduction plan.

Other submitters expressed concern about a lack of infrastructure within Aotearoa New Zealand to support the implementation of the proposals. Across all three parts, submitters were concerned about insufficient numbers of depots, capacity to process recycled materials, and the capacity of some councils to implement changes in the proposed timeframes.

### 4.3. Future focus

Throughout the consultation, submitters emphasised a need for proposals to be future focused and future proofed. Some submitters mentioned that, while infrastructure might not currently exist to process some materials, it would need to be developed in order for new products to be introduced to the NZ CRS and kerbside collection in the future. Submitters considered that products should be introduced as they become more popularly used, and the NZ CRS and kerbside collection scheme need to have enough flexibility to allow for new products to be recycled in future.

### 4.4. Moving towards a circular economy

Submitters repeatedly raised the importance of working towards a circular economy, with the proposed NZ CRS and kerbside collection systems being viewed as the building blocks for this. While submitters acknowledged that infrastructure might not yet be in place to facilitate this, they said that it would need to be put in place quickly.

Some submitters saw refillable containers as the way forward for Aotearoa New Zealand, and while there were differing views around whether the NZ CRS should support the refillables market, this was largely because submitters had different views on how best to promote and grow the market. Most submitters agreed the use of refillable containers should be encouraged if Aotearoa New Zealand is to achieve a truly circular economy. While recycling was certainly viewed as a positive step forward and an area New Zealanders could improve in, refillable systems would ultimately need to be implemented for Aotearoa New Zealand to be truly sustainable.

### 4.5. Education needed

Education for various stakeholder types was raised across all parts of the consultation. Submitters considered that an integral part of the success of a NZ CRS and updated kerbside recycling system would be clear, accessible public education campaigns to get people on board with the scheme and changes. Submitters emphasised the need for education to make sure people were recycling or returning the right items in the right places, maximising the efficiency of the implemented proposals. Education was a key tool raised to support businesses to separate their food waste in order to divert it from landfills.

General public education was also raised by some submitters as necessary to enable people to understand how their current behaviour contributes to emissions. Submitters said that people needed to be aware of what actions they might be able to take through a NZ CRS and kerbside recycling system to reduce their emissions.

### 4.6. Consultation with communities

Submitters wanted community and relevant stakeholder perspectives to be integrated across all aspects of the proposals. Many submitters stated that local communities know what will work best for them, and so should be consulted on aspects of the schemes that will require them to change their behaviour. This was particularly prevalent on proposals that would require different solutions for urban and rural populations. Rural submitters and councils in rural areas emphasised that a one-size-fits-all approach would not work for their communities, so solutions should be developed in direct consultation with these communities.



Many submitters noted the importance of continued engagement with iwi, business and industry, councils and the public to ensure the NZ CRS is fit for purpose and well understood. For kerbside proposals, submitters suggested that any consultation groups should include territorial representatives, local iwi, and representation of affected businesses.

A number of opportunities for communities were highlighted by some submitters. These included additional job opportunities, education opportunities, decreased litter and environmental damage from litter, and opportunities to innovate, particularly around more sustainable packaging.

## **4.7. Embed Te Tiriti and te ao Māori approaches**

Some submitters noted that further integration of te ao Māori principles and consideration of Te Tiriti is needed throughout the NZ CRS scheme. They emphasised that this integration was required in the way the scheme was designed, managed and implemented, and when thinking about expected outcomes. To do this, a partnership approach was suggested throughout management, governance and operational levels. Supporters of the Para Kore and Zero Waste Network submission reinforced this:

The contribution of Māori and Te Tiriti o Waitangi considerations need to be understood and integrated into the scheme's design, implementation and broader outcomes. The best way of bringing te ao Māori (a Māori worldview) and values into the scheme is to create partnership with Māori at the governance, management and operational levels.

Māori must not be seen as a stakeholder but as a partner. Through partnership Māori will have an opportunity to shape, and get involved with, the opportunities created by the scheme at the national, regional and local scales. This will ensure iwi, hapū and whānau have a share in the economic activity generated through the CRS. This is crucial for ensuring all New Zealanders have access to the CRS and that outcomes are generated in an equitable way. – Zero Waste Network (20263) and Para Kore (21453)

# **Part 1: Kaupapa whakahoki ipu – Container Return Scheme**

## 5. Support for a NZ CRS

Please refer to Table 1 for quantification of submitters.

### 5.1. Support for implementation of a NZ CRS

**Question 28:** Do you support the implementation of a container return scheme for Aotearoa New Zealand?

Submission type	Option	Total	Per cent
Short form	Yes	1,232	92%
	No	58	4%
	Undecided	52	4%
	Total responses	1,342	
Detailed	Yes	287	90%
	No	33	10%
	Total responses	320	
Combined	Yes	1,519	91%
	No	91	6%
	Undecided	52	3%
Total responses		1,662	

In addition to the responses set out above, a further 3,996 individuals signed up to the Kiwi Bottle Drive pro forma submission, which stated strong support for a NZ CRS. If these numbers are included in the percentage calculations above, support for a NZ CRS rises to 98%.

Overall, most submitters supported the implementation of a NZ CRS, commenting that the NZ CRS would help reduce litter, promote a circular economy, change consumer and manufacturer behaviours, and perhaps reduce cost and increase efficiencies of waste collection.

We fully support the implementation of a Container Return Scheme for beverage containers. A CRS is one of a number of policy instruments that need to be brought into play to shape the way we produce, consume, use and recover products and materials. It is a critical stepping stone in enabling our transition to a circular economy. – Zero Waste Network (21453)

Some submitters agreed with the implementation of the scheme but were concerned about increased costs for manufacturers and consumers. Some submitters suggested that further analysis be undertaken, to ensure the costs and benefits of the scheme are fully understood across stakeholder groups before implementation. Further, a few submitters in support of the scheme were still sceptical about how achievable the targets and timeframes for implementation would be.

Some submitters raised concerns about the kerbside system possibly becoming less efficient with the NZ CRS being introduced. A few submitters noted that they did not support the implementation of the scheme altogether and instead wanted to see greater focus on

increasing the efficiency and effectiveness of kerbside recycling and/or establishing refillable or reusable systems, to ensure services are not duplicated.

We support a regulated product stewardship approach for material streams. We support scheme design that supports existing infrastructure and collection methodology and doesn't duplicate services and facilities unnecessarily. – Glass Packaging Forum (20336)

Many submitters noted the importance of continued engagement with iwi, business and industry, councils, and the wider public to ensure the scheme is fit for purpose and well understood.

Yes, we support the implementation of a CRS for New Zealand. We recommend councils continue to be engaged in the development of this programme and encourage a stronger focus on, and resourcing of, the education and behaviour change work to support the scheme. – Tasman District Council (21441)

## 5.2. Support if key scheme design criteria were different

**Question 29:** If you do not support or are undecided about a NZ CRS, would you support implementation of a scheme if any of the key scheme design criteria were different? (For example, the deposit amount, scope of containers, network design, governance model, scheme financial model.) Please explain.

Submission type	Option	Total	Percent
Short form	Yes	213	73%
	No	78	27%
	<b>Total responses</b>	<b>291</b>	
Detailed	Yes	37	77%
	No	11	23%
	<b>Total responses</b>	<b>48</b>	
Combined	Yes	250	74%
	No	89	26%
<b>Total responses</b>		<b>339</b>	

Some submitters caveated their support for the scheme by stating their support relied on changes being made. The suggested changes to scheme design criteria are largely reflected in previous questions and include examples such as:

- changing the deposit amount (most of these submitters suggested 10 cents)
- implementing a separate glass scheme
- making it voluntary for retailers to participate
- aligning the NZ CRS with the kerbside system
- ensuring the infrastructure caters to consumer needs, with diverse and accessible options being available.

We would support implementation of a CRS scheme if some of the key scheme design criteria were amended. We support a scheme that improves recovery AND recycling rates but does so in a way that balances the cost to our members' businesses and customers. – Hospitality NZ (20289), Brewers Guild (20414).

## 6. Container Return Scheme finances

Please refer to Table 1 for quantification of submitters.

### 6.1. Proposed refund amount

**Question 3:** Do you support the proposed refund amount of 20 cents?

A NZ CRS would require that eligible beverage containers carry a refundable deposit, to encourage consumers to return empty containers to a designated collection point for the refund. The refundable deposit amount is the financial value that is 'added' to the normal price of a beverage, and is only applied to beverage containers that are eligible within the scheme. When an empty beverage container is returned to a designated collection point for recycling, the person gets the deposit refunded. This is sometimes known as 'redeeming' or 'container redemption'. This cash refund directly incentivises consumers to return their containers for recycling.

Submission type	Option	Total	Percent
Short form	Yes	1,207	90%
	No	132	10%
	<b>Total responses</b>	<b>1,339</b>	
Detailed	Yes	235	77%
	No	69	23%
	<b>Total responses</b>	<b>304</b>	
Combined	Yes	1,442	88%
	No	201	12%
<b>Total responses</b>		<b>1,643</b>	

Most submitters that responded directly to the consultation survey agreed with the proposed 20-cent refundable deposit amount. In addition, 3,979 individuals that supported the Kiwi Bottle Drive pro forma submission, said 20 cents struck a good balance between incentivising consumers and excessive cost:

I support a deposit refund amount of 20 cents to give empty containers a significant value. Twenty cents strikes a good balance between giving consumers a strong incentive to return containers, and avoiding an excessive upfront cost impact. – Kiwi Bottle Drive pro forma submission (21290)

A few submitters disagreed with 20 cents. Of these few, the businesses and industry associations were concerned that the 20-cent refund amount would increase the cost of living and disproportionately impact low-income groups.

The 20-cent refund is exclusive of the cost of running the CRS and we expect the cost-of-living impact would be far higher than this. With a total cost per container over 30 cents, the document ignores the commercial reality that product pricing will need to be increased by far more than the direct costs outlined, in order to cover costs incurred throughout the supply chain. – Pernod Ricard Winemakers (20310)

Although supportive of the overall scheme, most businesses and industry associations called for a 10-cent deposit amount.

We recommend that the deposit amount is set at 10 cents. This allows harmonisation across the Australian and New Zealand schemes, which reduces the risk of fraud, and the cost of fraud prevention measures and differentiated labelling. It softens the inflationary impact on consumers. – Coca-Cola Europacific Partners (20426)

Many of these submitters recommended that this amount be GST inclusive. Some businesses commented that the cost to implement the scheme would add extra costs to their operations and that this would have to be borne by the consumer. It was noted by some industry associations and beverage manufacturers that because the amount was inconsistent with Australia's 10-cent amount, additional complexities and costs would arise from changes to labelling standards and processes for businesses, especially those operating trans-Tasman.

However, many councils, individuals, and community groups supported the 20-cent refund amount, or sought a higher amount such as 30 or 50 cents. These submitters noted that a 20-cent or higher refund would create a strong incentive to return containers.

Make it higher, to increase the incentive. 50 cents would be a good round number. The consultation document raises 'affordability' as a concern, but this is poorly argued. If the scheme works and consumers return their container, they receive back their deposit, so it doesn't cost them anything. – Individual (20083)

I support a deposit refund amount of 20 cents to give empty containers a significant value. Twenty cents strikes a good balance between giving consumers a strong incentive to return containers, and avoiding an excessive upfront cost impact. – Kiwi Bottle Drive pro forma submission (21290)

Some submitters also noted that the proposed refund would provide opportunities for schools, sports clubs, charities, and others to participate in clean ups and fundraising events. Some submitters also explained that flexibility should be built into the system, to ensure the price point can adapt to inflation, and can change if intended outcomes are not achieved.

## 6.2. Receiving refunds for containers

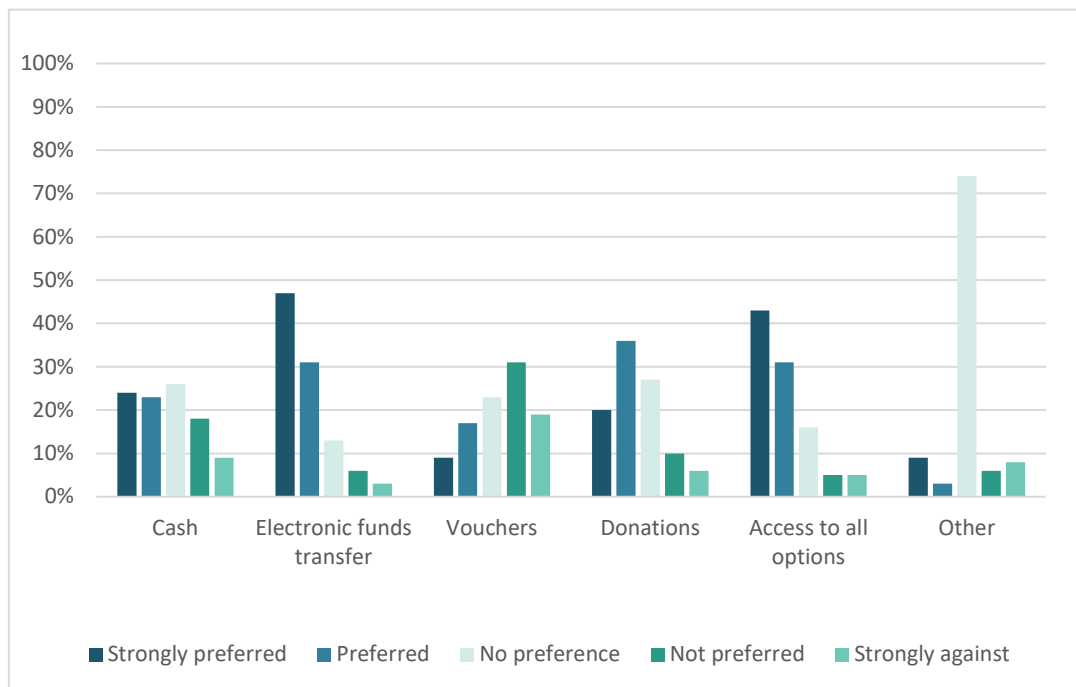
**Question 4:** How would you like to receive your refunds for containers? Please select all that are relevant and select your preference.

- Cash
- Electronic funds transfer (eg, through a scheme account or mobile phone app)
- Vouchers (for cash or equivalent value product purchase)

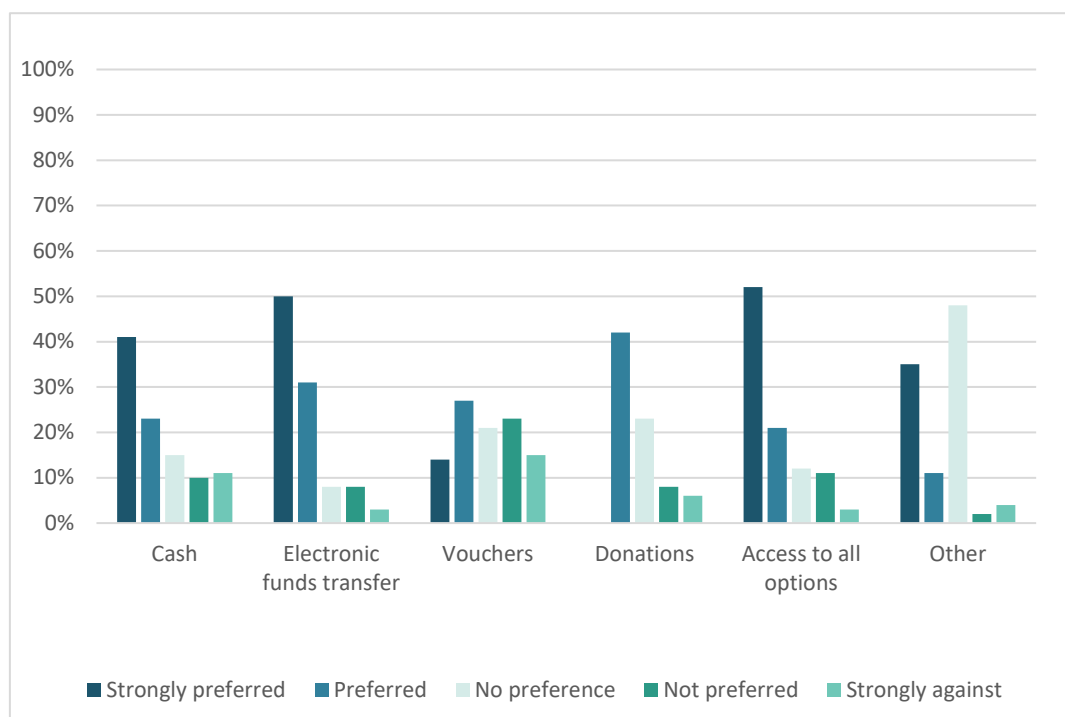
- Donations to local community organisations/charities
- Access to all options
- Other (please specify)

Figures 1, 2 and 3 present the percentages of submissions that responded directly to the survey indicated in response to the options offered under Question 4, across four preference levels: 'Strongly preferred', 'Preferred', 'No preference', 'Not preferred' and 'Strongly against'.

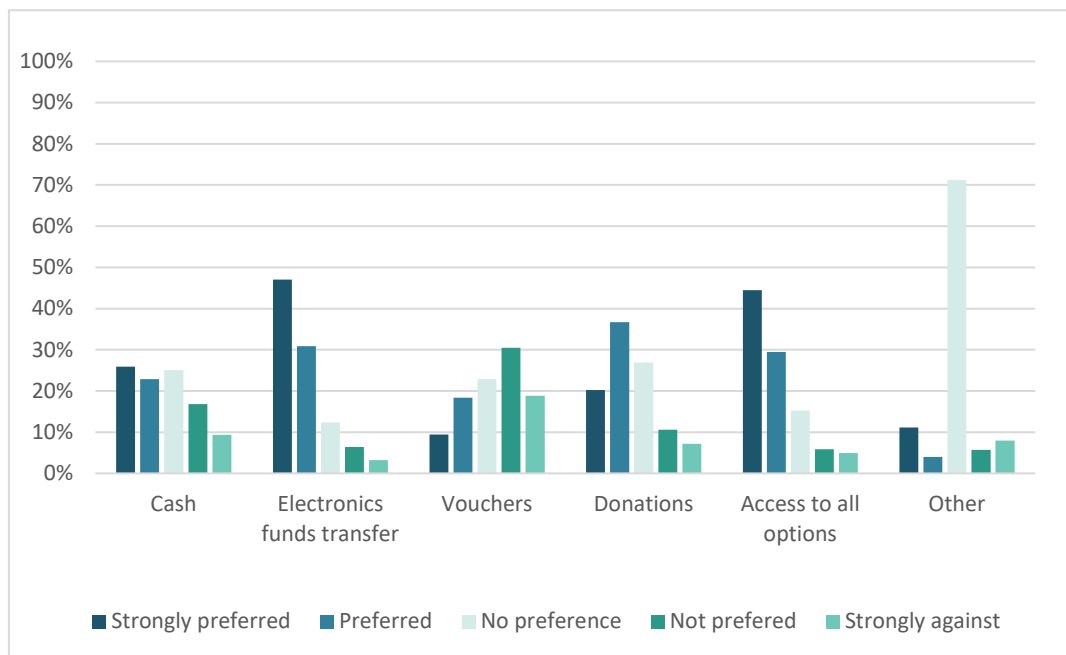
**Figure 1: How would you like to receive your refunds for containers? Short-form submissions**



**Figure 2: How would you like to receive your refunds for containers? Detailed submissions**



**Figure 3: How would you like to receive your refunds for containers? Combined short-form and detailed submissions**



### 6.2.1. Access to all options

Most submitters strongly preferred or preferred having electronic funds transfer and having access to all options. This included individuals, councils, and industry associations. Cash and donations were also strongly preferred or preferred by many submitters.

Submitters who preferred access to all options maintained that allowing refunds to be collected in many different ways would best suit different venues and would ensure the system is easily accessible to everyone.

At all return points, it should always be possible to receive my 20-cent deposit refund in cash or electronic funds transfer. As an optional extra, I also support being able to receive my refund as a shop voucher or to donate my refund to charity. – Kiwi Bottle Drive pro forma submission (21290).

A few submitters did not prefer having access to all options, but did not provide a reason for their preference.

### 6.2.2. Cash

Overall, many submitters were keen to receive their refunds in cash, but a few were against this form of refund. A few submitters noted that not many New Zealanders use cash, while some others cited issues with cash handling and storage at retail outlets. As a result, a few submitters argued that providing refunds in cash should not be mandatory for retailers.

Retailers should have the option to provide cash refunds, but it should not be mandatory due to costs of cash handling and availability of cash in more remote locations. – Fenton Street Arts Collective & Distillery, The Couch Limited (20335)



Some submitters were in favour of cash refunds, commenting that it could encourage wider participation, especially for those who cannot or do not wish to use online or alternative forms of fund transfer.

Although we are transitioning to a more digital world, there are still vulnerable segments of the population and children who do not have easy access to online banking. Removing any payment option can potentially remove the motivation for a consumer to actively participate in the program. – International Council of Beverage Associations – Asia Pacific Regional Group (20293)

### **6.2.3. Electronic transfer**

Most submitters preferred or strongly preferred the electronic transfer option. Only a few submitters opposed this option altogether. A few submitters who supported electronic transfers noted that it is commonly used and convenient to most people; however, a few submitters noted that elderly people may be less inclined to use this option, and therefore other options should be offered.

Electronic bank transfer has this advantage of convenience and familiarity over other methods. – Ngā Rangahautira (20119)

We note the need to be aware of an ageing population that may not be confident or inclined to use apps. – Tasman District Council (21441)

### **6.2.4. Vouchers (for cash or equivalent value product purchase)**

There were mixed preferences for the use of vouchers, with a relatively even spread for and against their use. A few submitters mentioned that a voucher option would limit individual ability to choose where refunds are spent and favour particular retailers. However, a few submitters considered that providing vouchers could mitigate the commonly cited issue of cash handling and storage for retailers.

### **6.2.5. Donations**

Many submitters also preferred or strongly preferred to have donations available as an option. Few were strongly against this option. A few submitters noted that there would need to be transparent accountability processes as to how charities would be selected as eligible to receive donations of NZ CRS deposit refunds.

We note in particular the opportunity for local fundraising linked directly to the CRS provided by the donation option. – Nelson City Council (20132)

We note there will need to be some clear and transparent accountability process surrounding how charities are selected as eligible for receiving donations of CRS deposit refunds. – WasteMINZ Product Stewardship Sector Group (20154)

## **6.3. Variable scheme fees**

**Question 5:** Do you support the inclusion of variable scheme fees to incentivise more recyclable packaging and, in the future, reusable packaging?

Eco-modulation is a variable fee pricing mechanism that can be used to improve waste minimisation and circular-economy outcomes. A fee is modulated to reflect the costs of recycling a given product, and the fee typically increases when a product is hard to recycle. Equally, products that are easy to recycle have lower scheme fees, encouraging producers to use recyclable materials. The eco-modulation of fees incentivises producers to improve the environmental sustainability of their product design.

Submission type	Option	Total	Per cent
Detailed	Yes	199	90%
	No	21	10%
	<b>Total responses</b>	<b>220</b>	

Most submitters supported including variable scheme fees. Many submitters explained that this could incentivise the use of packaging that is easier to recycle, as well as increasing the circular potential of packaging. Some submitters also noted that this approach could encourage more producer responsibility and lead to increased innovation for packaging options.

Yes, we strongly support variable scheme fees based on how much it costs to collect, transport, and reuse or recycle a package. It is fair that producers who choose packaging that is costlier to collect, transport and process should pay more to cover that extra cost. We also support eco-modulation of fees to reflect the environmental impacts of different packaging types and thus incentivise use of more reusable and more recyclable packaging.  
– Greenpeace Aotearoa (20450)

Many submitters acknowledged two distinct aims of modulation: to cover the cost to collect, transport, reuse, or recycle types of packaging; and to incentivise positive environmental outcomes. These submitters noted the complexities of calculating and considering fees according to the two aims. A few submitters noted that these aims should be treated separately, to ensure the fees are allocated appropriately.

First, a variable fee could be implemented to allocate the full costs of recovery fairly, so the more expensive it is to recover or recycle a container the higher the fee. Secondly, in order to incentivise environmentally beneficial outcomes, such as closed-loop recycling, an eco-modulated fee could be implemented to drive increasing improvements to product design. – WasteMINZ Product Stewardship Sector Group (20154)

Some submitters agreed that eco-modulation was logical and wanted circular systems to be encouraged and incentivised. Some submitters noted that the complexity and evolving innovation of packaging could make it difficult to maintain fair and stable definitions of materials that are considered more or less recyclable.

It is difficult to support this statement<sup>14</sup> when the detail and definition in the consultation document is insufficient. With greater clarification of terms such as more recyclable and better understanding of why glass is considered to be less recyclable, we would be in a better position to be more definitive. – Spirits NZ (20321)

<sup>14</sup> For example, eco-modulation of the scheme fee could mean that producers of harder-to-recycle packaging such as LPB and glass would likely have a slightly higher scheme fee, given there is limited market demand for the recovered materials onshore and they are more likely to be downcycled in Aotearoa New Zealand. *Transforming recycling*, note 1 above, p 38.

A few submitters noted that clear definitions were needed to ensure calculable measures would be used to allocate fees, and to avoid political influence on pricing of certain products. Some submitters noted that the fees should be flexible and regularly reviewed to ensure changes in materials and their life cycles and costs are considered, and that fees are adjusted accordingly.

Beverage producers generally supported the inclusion of scheme fees and eco-modulation. However, many of these submitters did not agree with the use of the terms ‘recyclable’ and ‘environmental costs’ in the application of the scheme fees.

In principle yes but further details on the proposals are required. HWL supports variable fees to incentivise the move to more recyclable packaging. Furthermore, variable scheme fees could be significant in ensuring the scheme remains not-for-profit and operates on a net-cost principle. This does not extend to supporting the added phrase, “plus the associated environmental costs”. This undefined addition could seriously compromise the integrity of the scheme’s Management Agency by introducing potentially competing objectives and more subjective decision making. – Heinz Wattie’s Ltd (20389)

## 6.4. Proposed financial model

**Question 24:** Do you agree with the proposed ‘deposit financial model’ for a NZ CRS?

Under the deposit model, beverage producers pay for scheme fees and deposit fees on all eligible containers sold to market, regardless of whether the containers are returned through the NZ CRS. This ensures that beverage producers are not incentivised towards lower return rates. Most of the best-performing schemes globally (eg, European schemes) use a deposit financial model.

Submission type	Option	Total	Per cent
Detailed	Yes	178	89%
	No	21	11%
	<b>Total responses</b>	<b>199</b>	

Most submitters across all submitter types agreed with the proposed deposit financial model. Many of these submitters emphasised that a deposit financial model provided a good incentive for households to participate in a NZ CRS and saw it as more equitable than a refund model. Some submitters cited European jurisdictions using this model, stating that it worked well.

Yes, we strongly support the proposed deposit financial model, for the reasons outlined in the consultation document, which we also completely agree with. A deposit model has consistently been the model advocated for by New Zealand proponents of a container return scheme, in documents such as Happy Returns (Snow, 2021). The Deposit financial model is more transparent to the public. It also enables any unclaimed deposits to be used to support the objectives of the scheme. – Waiuku Zero Waste Ltd (20202)

A few submitters, mainly businesses and industry associations, gave conditional support to a deposit financial model. A few industry associations wanted clear guidance and legislation on what would happen to unredeemed deposits. These submitters considered it important that any unredeemed funds be offset against the scheme costs. A few submitters raised concerns about the initial costs and introduction period, particularly for smaller businesses, and wanted a managing agency to cover potential cashflow issues.

The increased upfront production costs will cause significant cashflow pressures for breweries, in particular those smaller breweries with lower capital availability and who are under increased cashflow pressures in the current economic environment. A CRS model that includes a loan to the Managing Agency to fund the initial float of the scheme operations would allow breweries to pay the scheme and deposit fee costs in arrears following the supply of containers into the market – this would greatly enable breweries and other businesses to manage our cashflow. – Brewers Association of New Zealand (20264)

However, Garage Project, a small brewery, noted that it supported the proposed model.

Yes, as this creates a level playing field between producers and does not incentivise producers to work to lower return rates. – Garage Project (20284)

Some submitters supported alternative models such as a refund financial model. These submitters were largely industry associations and businesses who were concerned with the upfront costs of a deposit financial model, and with this money sitting with a managing agency.

Our members support a refund model over a deposit model. The refund model ensures the scheme is responsible managing significant funds over time that otherwise belong to the 'payers' of the scheme. This ensures the intent of improving recovery can be carried out. Additionally, throughout the industry, 90-day payment terms are common, leaving a significant liquidity gap, particularly for smaller companies, unless beverage companies are invoiced in arrears. – Glass Packaging Forum (20336)

A few industry associations that supported the refund financial model suggested that for ongoing operation of the scheme, the managing agency should have control over its own finances, with an agreed set of principles.

- The beverage industry pays a fee determined by the managing agency for every eligible container sold in New Zealand.
- The managing agency is a not-for-profit entity with a clearly defined purpose.
- The managing agency does not retain surpluses beyond its operational needs or pay disbursements of retained revenue. The value of unredeemed deposits must be retained by the managing agency to fund the ongoing costs of the scheme.
- The managing agency charges all fees in arrears based on disclosures of actual containers sold.
- The managing agency set fees by material type to ensure full and fair cost recovery.

– New Zealand Beverage Council (20303)

## 7. Beverage containers

Please refer to Table 1 for quantification of submitters.

### 7.1. Proposed definition of a beverage

**Question 1:** Do you agree with the proposed definition of a beverage?

As stated in the consultation document, a ‘beverage’ means a liquid substance that is intended for human consumption by drinking. This proposed definition includes concentrates and cordials (given that it does not specify that a beverage needs to be ‘ready to drink’) and beverages such as drinkable yoghurt, smoothies, etc.

Submission type	Option	Total	Per cent
Detailed	Yes	216	93%
	No	17	7%
	<b>Total responses</b>	<b>233</b>	

Most submitters agreed with the proposed definition of a beverage. Some who provided further comments said it struck the right balance between being easy to understand for consumers but prescriptive enough for businesses to understand what products are included within the scope of the definition. However, while there was support, a few submitters – including industry associations and large manufacturers of beverages and food – noted the need for further minor technical refinements within the scheme’s regulations.

While we generally support the definition, we believe that it is not specific enough for regulation. – New Zealand Beverage Council (20303)

The definition is very broad and as such could have unintended consequences. At present it includes such items as liquid medicines, for instance. Unless these are intended to be part of the scheme, the definition either needs reworking or the legislation needs to clearly set out those items that technically fall under the proposed definition but are not intended to be part of the scheme. The legislation might need to list types of beverages to make this explicit. – Auckland Council (20402)

Some submitters wanted to clarify what ‘drinkable’ means. Many sought further guidance on whether items such as stocks, soups, medicines, and compotes etc would be included. Some also commented that, to avoid any confusion, regulation should explicitly list any beverages that would be excluded and/or included. Some submitters suggested aligning the definition with other international examples, including definitions found in regulations in New South Wales or Western Australia. A few submitters, including industry associations, wanted to work with the Government to further define the parameters of the definition of a beverage, to ensure the definition is fit for purpose.

This definition could result in perceived or actual confusion in the marketplace, eg, liquid medicines. This definition should be tightened further during the regulatory development stage. Add the words “to satisfy thirst or provide liquid nutrition”, after the statement “intended for human consumption by drinking”. Examples of this regulatory framework can be found at the Zerowaste Scotland DRS website. – Marlborough District Council (20071)

Some submitters also explained that the scheme should focus on ready-to-drink beverages as these are most commonly littered, meaning the scheme should not include cordials or concentrates.

However, a few submitters, including businesses and industry associations (eg, Food and Grocery Council and Heinz Wattie's), did not see it as a problem to include cordials or concentrates and wished to see a broad spectrum of beverages included in the definition.

## 7.2. Proposed definition of an eligible beverage container

**Question 2:** Do you agree with the proposed definition of an eligible beverage container?

An 'eligible beverage container' refers to a vessel or casing of a beverage (regardless of whether it is sold alone or as a unit in a multipack) that is sealed in an airtight and watertight state at the point of sale. For clarity, this proposed definition would mean that open beverage containers such as cups and coffee cups, and non-beverage containers (eg, ice cream tubs) are out of scope and would not be included in the scheme.

Submission type	Option	Total	Per cent
Detailed	Yes	206	92%
	No	18	8%
	<b>Total responses</b>	<b>224</b>	

Most submitters agreed with the proposed definition of an eligible beverage container. Many also suggested further possible changes or improvements for consideration. Some submitters explained that they wanted to see technical specifications added to the definition to maximise recyclability, as well as a definition for an eligible container that can be returned to the scheme after use.

We think the CRS should also include technical specifications for container eligibility to maximise recyclability (and design for recycling) and to reduce the use of harmful additives in beverage packaging. For example, specifying the allowable materials for caps, closures, labels, and types of pigmentation and adhesives, in order to avoid hard-to-recycle or harmful materials like PVC, non-water-based glues, or pigmented PET, and disallowing the uses of classes of chemicals of concern. – New Zealand Product Stewardship Council (20208)

Another point of clarification concerns whether the proposed definition should be refined to guide the eligibility of a container under the scheme and identify that it is whole, undamaged, uncontaminated, and sold in New Zealand. – Coca-Cola Europacific Partners (20426)

Some submitters, including industry associations and businesses, suggested replacing 'airtight' and 'watertight' with 'sealed', to better reflect the qualities of a container that contains liquid. Other submitters suggested that only beverages that are sold in Aotearoa New Zealand should be included within the definition.

### 7.2.1. Out-of-scope containers (definition)

A few submitters disagreed with the proposed definition that only includes beverage containers and wanted to see other out-of-scope product types such as ice cream tubs or butter containers included in the scheme. Some submitters also noted that a framework or process should be established to ensure additional containers can be added to the list in the future.

However, Council view is that the focus on a subset of beverage containers is too narrow. We suggest establishing a framework that provides for introducing additional containers (non beverage) and other items once the scheme is established. – Southland District Council (20374)

Additionally, a few submitters commented that the addition of a list with specific beverage containers that are included under the definition would help with clarity. While out of scope of this consultation, many submitters mentioned the exclusion of coffee cups within the definition. Many of these submitters noted that if the decision was made to not ban single-use coffee cups, that these should be added into the scheme.<sup>15</sup>

## 7.3. Beverage container materials for inclusion in a NZ CRS

**Question 6:** Do you agree with the proposed broad scope of beverage container material types to be included in the NZ CRS?

We propose that the NZ CRS would target the beverage container materials that are most frequently bought, under-recovered and littered, rather than specific product types. We therefore propose that all single-use beverage containers would be in scope of the scheme and eligible for a refund if they are made from one or more of the following frequently bought beverage container materials:

- glass
- plastic (PET, HDPE and PP only, and recyclable bio-based HDPE and PET)
- metal (eg, aluminium, steel, tinplate and bimetals)
- LPB (the only composite product proposed).

Submission type	Option	Total	Per cent
Short form	Yes	1,201	90%
	No	139	10%
	Total responses	1,340	
Detailed	Yes	178	82%
	No	40	18%
	Total responses	218	
Combined	Yes	1,379	89%
	No	179	11%

<sup>15</sup> A parallel work programme is underway by the Ministry to coordinate sector experts and inform a plan for single-use cups and coffee cups. This will inform possible options for phasing out these cups by 2025. *Transforming recycling*, note 1 above, p 118.

Most submitters agreed with the proposed scope of beverage containers as outlined in the consultation document. In addition, a further 3,982 Kiwi Bottle Drive submitters indicated support for a broad scope of containers.

However, a few submitters said the scope is too broad, and others said it was too narrow. Some of these submitters noted that complexity should be minimised to ensure the widest participation possible.

A few submitters noted that the consultation document proposes that beverage producers could not use container types out of scope, and that this negates the 'free-rider' risk, driving a transition to eligible (more recyclable) containers.

Yes. We support excluding the materials that are proposed to be excluded (eg, compostables, pouches etc) provided this means that they therefore cannot be put on the market for beverage packaging. – WasteMINZ Product Stewardship Sector Group (20154)

A comprehensive scheme with no exemptions reduces complexity, increases overall cost-effectiveness and efficiency, and avoids the risk of free riders (ie, producers shifting to excluded materials/containers to avoid regulation/scheme costs). – Waiuku Zero Waste (20202)

A few submitters were concerned about LPB, glass and other materials being included within the NZ CRS container scope. Broadly, submitters wanted to see the NZ CRS and kerbside collections aligned. However, a few producers and industry associations, as well as a few individual submitters, were against including glass and wished to see a separate scheme for glass operating alongside a NZ CRS.

The GPF has long advocated for glass being excluded from a CRS as it already has a high recovery rate ... CRS schemes largely rely on collecting mixed-colour glass, which is often crushed for transport. This results in more loss in the system and glass of lower recyclability than the source separated collections carried out by most New Zealand councils. – Glass Packaging Forum (20336)

Other producers, industry associations, and most individual submitters and councils wanted to see glass included within the scheme in order to reduce confusion and inefficiencies.

The Forum supports a fully comprehensive beverage container return scheme that includes all materials and beverage types. The scheme must include all beverage containers sold in New Zealand. – WasteMINZ Territorial Authorities Officers Forum (20376)

Members have varying views about materials based on their individual portfolios. However, the majority of the non-alcoholic beverage sector has indicated that they support the broad range of materials for inclusion, as it is equitable amongst those in the industry and participating in the scheme is the right thing to do. When considering materials to include, it is most important that a scheme can maximise collection at the lowest cost. – New Zealand Beverage Council (20303)

While many agreed LPB should be included, some again cited concerns due to a current lack of infrastructure and complex systems needed to recycle it. These comments are discussed in [Question 36](#).



Many individual submitters, along with submitters that supported the Kiwi Bottle Drive form submission, wanted the scheme to be comprehensive enough to ensure it was accessible and cost efficient for consumers, and they supported the proposed scope of beverage container materials (glass, plastic, metal, LPB).

I strongly support a comprehensive scheme that includes all materials (glass, plastic, metal, liquid paperboard), and all beverage types. Comprehensive schemes are simpler for consumers because all bottles, cans and cartons are treated the same. Comprehensive schemes are also more cost effective, efficient and fair because beverage companies and industry groups play by the same rules, and no one gets a free ride. – Kiwi Bottle Drive pro forma submission (21290)

## 7.4. Other container material types

**Question 7:** If you do not agree with the proposed broad scope (refer to [Question 6](#)), please select all container material types that you think should be included in the scheme.

- Glass
- Plastic (PET 1, HDPE 2, PP 5, and recyclable bio-based HDPE and PET)
- Metal (eg, aluminium, steel, tinplate and bimetals)
- LPB
- Further comments

Material type	Total	Per cent
Glass	63	88%
Plastic (PET 1, HDPE 2, PP 5, and recyclable bio-based HDPE 2 and PET 1)	62	86%
Metal (eg, aluminium, steel, tinplate and bimetals)	62	86%
Liquid paperboard	49	68%
<b>Total responses</b>	<b>72</b>	

Some submitters considered that metal should not be included, and a few submitters considered that glass, plastic and LPB should not be included. Stakeholders wanting to exclude glass noted it would help ensure the existing high rates of recovery remain.

We submit that a separate scheme should be set up for glass that runs in parallel to a return scheme for plastic and [aluminium] as has been implemented successfully elsewhere in the world. This would maximise NZ's recycling quality and would achieve better sustainability outcomes while enhancing the existing glass scheme which already collects close to 75% of all glass. – Liquorland (20298)

## 7.5. Alternative beverage container packaging types

**Question 8:** Do you support a process where alternative beverage container packaging types could be considered on a case by-case basis for inclusion within the NZ CRS?

Submission type	Option	Total	Per cent
Detailed	Yes	196	93%

	No	14	7%
	<b>Total responses</b>	<b>210</b>	

Most submitters agreed that alternative container packaging types could be considered on a case-by-case basis. Some submitters noted that regulators need the ability to respond to changes in packaging technology and market demands. However, many submitters caveated their support for several reasons, with some noting that strict controls should be put in place to ensure the material is suitable to be included. Some submitters suggested the process be aligned with the waste hierarchy, and new materials should be proven to be circular and low impact.

Alternative materials would have to have a proven method of separation, transport, and recycling processing as well as a market for the final product. – Central Otago District Health Board<sup>16</sup> (20130)

Any new packaging added after the initial phase should be required to have a closed loop local system for processing. – Nonstop Solutions (20103)

Further, some submitters explained that transparency would be important, with some suggesting that an independent agency oversee the process to ensure anti-competitive behaviour does not occur.

We support an approach with strict criteria ensuring minimal harm to the environment. The decision-making process must be governed by an independent managing agency and not left to an industry body alone, and each proposed new beverage container type must be assessed on a case-by-case basis. We support flexibility in the case of a new material or packaging type that can prove itself in terms of circularity and low impact on the environment. – Taranaki Solid Waste Management Committee<sup>17</sup> (21450, 21451 and 21448)

A few submitters suggested moving the process away from accepting new material, directing it towards processing in-scope material, expanding the refillables market, or innovating for existing materials. It was also noted by a few submitters that there should be a process for excluding currently included materials. A few submitters noted that any inclusion and exemption should align with the kerbside recycling system.

---

<sup>16</sup> See note 7, referencing the fact that DHBs have been disestablished, so this submission does not necessarily reflect the views of Te Whatu Ora, the successor organisation.

<sup>17</sup> Committee including representatives from the New Plymouth District Council, the Stratford District Council and the South Taranaki District Council

## 8. Beverage types proposed for exemption

Please refer to Table 1 for quantification of submitters.

### 8.1. Fresh milk exemption

**Question 9:** Do you agree with the proposal to exempt fresh milk in all packaging types from the NZ CRS?

Submission type	Option	Total	Per cent
Short form	Yes	523	40%
	No	786	60%
	<b>Total responses</b>	<b>1,309</b>	
Detailed	Yes	69	34%
	No	135	66%
	<b>Total responses</b>	<b>204</b>	
Combined	Yes	592	39%
	No	921	61%
<b>Total responses</b>		<b>1,513</b>	

Many submitters, including individuals, opposed the proposal to exempt fresh milk from the NZ CRS, with only some in support. A further 3,978 Kiwi Bottle Drive submitters indicated that they did not support the fresh milk exemption. Many of those opposed stated that they did not understand why dairy milk containers would be exempt, but not alternative plant-based milk containers.

As a small New Zealand start up, it also hinders us, putting us even more on the backfoot against the multi-billion-dollar dairy conglomerates. Our ability to grow and compete will be slowed if the dominant, existing product is offered different, preferential treatment. We need a level playing field for innovative companies to compete with the entrenched dairy industry, not a system that preserves the status quo simply because that's the way it has always been. – Otis Oat Milk (20363)

Some submitters noted that plant and fresh milks should be treated the same, to ensure a level playing field, but did not state if they thought they should be exempted or included in the scheme. Some submitters, including councils and supermarkets (including Foodstuffs New Zealand), said plant milks were for a staple for many. As such, they should also be exempt, if the rationale was to maintain the price of staple products.

This exemption should be extended to include dairy milk as well as plant-based alternatives, including UHT forms of dairy milk and plant-based alternatives in all packaging types. This is because these products are substitutes for fresh dairy milk. Both milk and plant-based alternatives play a key nutritional role in New Zealand diets... – Foodstuffs NZ (20282)

Some submitters were concerned that the exemption could create a loophole or precedent for other beverage manufacturers' containers to be exempt from the NZ CRS.

Others suggested that to keep the NZ CRS streamlined and fair, all beverages including fresh milk should be included. Some submitters said the scheme would overall be less effective with exemptions.

While the consultation document has appropriately outlined legitimate rationale for the exclusion of fresh white milk, our members are concerned that creates an uneven playing field, particularly for those producers of dairy milk alternative or producers of long-life milk in liquid paperboard. Additionally, the inclusion of fresh white milk would add value for kerbside collection, simplify the scheme for consumers and ensure a level playing field. The NZBC supports reviewing the inclusion of fresh cow's milk in the scheme once operation has commenced. The inclusion of milk, particularly in the HoReCa sector, will increase collection of additional valuable material for recycling and recycled packaging. – New Zealand Beverage Council (20303)

Dairy cannot be excluded. All of the rationale for excluding dairy applies to Boring, it would apply to other plant milks also, but because they are Liquid Paper Board they do not have the same uptake in kerbside recycling. If dairy is excluded, it will further widen the gap between plant-based milks and dairy – making plant milk even more inaccessible than it currently is. – Apollo Foods (20108)

Removing milk is entirely inappropriate and unreasonable. The dairy industry already gets completely inequitable concessions of all types in NZ, to the benefit of dairy farmers and the direct detriment of the people of NZ, and this needs to end. – Individual (19614)

Submitters who supported the Kiwi Bottle Drive form submission considered that an exemption for fresh milk would make the scheme more complicated, less efficient, and more costly for communities.

To make things simple and fair, fresh milk should be included in the Container Return Scheme. A plastic bottle is a plastic bottle, no matter what product is inside it. Exempting milk would disadvantage existing refillable milk bottle schemes. It would also mean that the wider community continues to bear the costs of collecting milk bottles for recycling, with many plastic milk bottles continuing to go to landfill, particularly from the commercial sector. – Kiwi Bottle Drive pro forma submission (21290)

A range of submitter types, including local government, did not support the proposal, because they did not think a household staple product should be subject to price increases, especially while inflation was high. Some submitters supported the use of variable scheme fees to consider a product's nutritional value to its community.

While the additional scheme fee of 3–5c per container is relatively minor, the impact of that together with a low deposit (if not reclaimed) may start to add up for disadvantaged households. – Auckland Council (20402)

However, there were mixed views from individual submitters as to the impact of a potential price increase on a household staple product.

The economic argument against having staple foods excluded does not sit well with me because the 20 cents gets refunded to be spent again there is only really a one-off 20-cent cost per bottle of milk for the household to absorb. This is not an insurmountable amount in most food budgets. – Individual (18648)

If 'fresh milk' was included it would seriously [affect] those on lower incomes and those who are most in need of the calcium and protein. Those who purchase the 'milk

alternatives' are usually in the higher income bracket and less likely to be affected by the increase in price. – Individual (18933)

Some submitters also said that recycling milk containers raised hygiene concerns if containers were not clean, and that large quantities were already being recycled at the kerbside and therefore did not need to be targeted. A few submitters said that milk bottles were exempt in overseas systems, so the same should occur in Aotearoa New Zealand.

## 8.2. Investigating commercial recovery of fresh milk beverage containers

**Question 10:** Do you support the Ministry investigating how to target the commercial recovery of fresh milk beverage containers through other means?

Submission type	Option	Total	Per cent
Detailed	Yes	130	63%
	No	77	37%
	Total responses	207	

Many submitters supported the Ministry investigating how to best target the commercial recovery of milk containers.

We agree there may be another product stewardship solution for these containers. Packaging should be dealt with in terms of what material it is made of and not what food or beverage it contains. We support regulated stewardship which is well designed, evidence based and optimises existing infrastructure. A robust co-design process for fresh milk beverage containers may ultimately result in a stand-alone scheme, or one combined with other materials. – Glass Packaging Forum (20336)

Yes, if fresh milk is not included in the CRS, it should be included in the Plastic Priority Product Scheme to increase the recovery of HDPE bottles for recycling. We note that there is a higher value in recycling for having a separate recycling stream to assist with high-grade recycled-food-approved HDPE. – PACT Submission (20340)

Some submitters were opposed to this proposal, noting that the recovery of containers should be based on the type of material the container is made out of, not what is held within the container. Both those who supported and opposed this wanted milk containers to be included in the NZ CRS. However, those in support said that if milk containers were not included, further research was needed on how they can be recovered. It was important to those in support that all containers were recovered to the best extent possible, and they made suggestions as to how this could be done. A range of submitters mentioned milk keg systems being used by some in the hospitality industry already.

There is also the opportunity to develop a reusable approach. In the Nelson Tasman region, local milk suppliers already run reusable bottle vending machine ... this could also focus on developing a solution for milk containers used by the hospitality industry. – Tasman District Council (21441)

Submitters who were opposed said that enacting multiple schemes was confusing and would create administrative, branding, marketing, management, and regulatory issues, as well as

requiring infrastructure to be upgraded. There were also concerns that an alternative system would reduce the success of existing initiatives already occurring to recover containers.

We do not support the exemption of milk from the CRS. This creates an unfair and inefficient system. Attempting to paper over this by investigating other means of recovering commercial milk bottles wastes time and will inevitably produce a less effective outcome, more inefficiently. Creating parallel systems for different beverage products is confusing and unnecessary, and increases complexity and cost. – Waiuku Zero Waste Ltd (20202)

## 8.3. Declaring fresh milk beverage containers a priority product

**Question 11:** Do you support the Ministry investigating the option of declaring fresh milk beverage containers made out of plastic (eg, plastic milk bottles and LPB containers) a priority product and thereby including them within another product-stewardship scheme?

Submission type	Option	Total	Per cent
Detailed	Yes	120	56%
	No	96	44%
	Total responses	216	

There were mixed views on whether the Ministry should investigate the option of declaring fresh milk containers a priority product. Submitters in support said that fresh milk packaging needs to be declared a priority product to ensure milk containers are still appropriately recycled.

This would compel manufacturers and beverage producers to look at container recovery options to develop and use alternatives. – Dunedin City Council (20079)

Submitters that did not support this proposal stated that fresh milk containers should be dealt with through a NZ CRS. These submitters commented that an alternative scheme simply introduced unnecessary complexity, inefficiency, and increased costs, with one submitter commenting that unless recycling is easy, people will not bother.

A few submitters said that consumers needed to have a clear scheme to follow, for recycling to be widespread and successful.

There is little sense in having a separate scheme covering all fresh milk containers if that includes those used in households. If that were the intention, they might as well be included in the NZ CRS. – Plastics New Zealand Inc (21425)

## 8.4. Exemption of refillable beverage containers with an established return/refillables scheme

**Question 7 of the short form survey:** Do you think refillable beverage containers should be included within a scheme in the future?

Submission type	Option	Total	Percent
Short form	Yes	1085	83%
	No	221	17%
	<b>Total responses</b>	<b>1,306</b>	

**Question 12 of the long form survey:** We are proposing that beverage containers that are intended for refilling and have an established return/refillables scheme would be exempt from the NZ CRS at this stage. Do you agree?

Submission type	Option	Total	Per cent
Detailed	Yes	132	65%
	No	71	35%
	<b>Total responses</b>	<b>203</b>	

Many submitters supported refillable containers being exempt from the NZ CRS, while some were opposed. Those who agreed said that single-use packaging needs to be phased out, as refillables are the way forward and should be supported. Exempting refillables from the NZ CRS would also incentivise manufacturers to research refillable options, instead of recyclable products, which was necessary for creating a circular economy. The hospitality industry supported the exemption.

Refillables should be excluded from the scheme in the future. Refillables will need to be excluded from the proposed scheme to allow for continued innovation and growth in their own right. – Hospitality NZ (20289)

Submitters supporting the inclusion of refillables in the NZ CRS commented that it would encourage an increased uptake in their use and have significant economic and environmental benefits.

It is important that the Container Return Scheme leads to more reusable and refillable beverage packaging ... Designing reuse into our Container Return Scheme from the outset means more companies will wash and reuse glass bottles, and sell drinks on tap. Reusable containers should be included in the Container Return Scheme, or companies using reusable containers should be able to opt into the system, so they can access the scheme's collection and return infrastructure. The Container Return Scheme must also include policies that drive an increase in reusables, eg, reusable beverage container targets for retailers and producers, and economic incentives and financial support for reusables. – Kiwi Bottle Drive pro forma submission (21290)

Some submitters noted that the cost of implementing a reuse scheme could be substantial; however, in the long term, resource use and costs could decrease, with progress made towards creating a circular and low-carbon economy. These submitters noted that inclusion of refillables would incentivise reuse, which is likely to be less resource intensive, over recycling.

Reuse needs to be an integral part of the proposed CRS for the Government's low-carbon, low-waste circular economy vision for Aotearoa to be realised. A reuse scheme will provide better economic outcomes in the long-term as the true cost to the environment is

incorporated into the life cycle of a single-use bottle. In addition, a CRS implemented with a reuse scheme better aligns with core environmental objectives. – Chia Sisters form submission, 452 signatories (21246)

Some submitters suggested that refillable systems should be opt-in for businesses. These submitters provided examples of initiatives that were already occurring and stated they did not want these initiatives undermined by refillable containers being included in the NZ CRS (eg, keg systems for milk at hospitality venues).

Those submitters who did not believe refillable containers should be exempt from the NZ CRS stated that refillable containers eventually reach an end of life, and so should be included in the scheme to ensure these containers can be recycled once they can no longer be reused. A few submitters suggested refillables need to be included in the NZ CRS to ensure significant behaviour change occurs, and supported adoption of refillables as a mainstream packaging type.

...beverage containers intended for refilling can be included in the NZ CRS for now and transition to a refillable scheme at a later date. This would encourage an uptake in recycling behaviours and the NZ CRS, and once communities are in the habit of returning their beverage containers, it will be a relatively easy transition to move towards refilling their beverage containers once the infrastructure is developed. – Hawke’s Bay District Health Board<sup>18</sup> (20287)

A few submitters were concerned that excluding refillable containers could open a potential loophole for businesses that do not have sufficient infrastructure to collect and refill containers.

This would open up another potential loophole and opportunity to game the system, by declaring a beverage container as refillable but then not providing the infrastructure for proper collecting and refilling. It would also be confusing to the consumer why some containers were exempt. – Individual (20027)

Some submitters suggested that refillable options and research should be incentivised, outside the NZ CRS, to encourage manufacturers to innovate new options. A few others discussed future refillable networks.

We support excluding beverage containers intended for refilling that have established collection networks. We acknowledge the importance of creating future refillable networks and believe that consideration must be given to this when designing the collection network. – New Zealand Beverage Council (20303)

## 8.5. Supporting the Aotearoa New Zealand refillables market

**Question 13:** Should there be a requirement for the proposed NZ CRS to support the Aotearoa New Zealand refillables market (eg, a refillable target)?

Submission type	Option	Total	Per cent
Detailed	Yes	162	82%

<sup>18</sup> See note 7, referencing the fact that DHBs have been disestablished, so this submission does not necessarily reflect the views of Te Whatu Ora.



	No	36	18%
	<b>Total responses</b>	<b>198</b>	

Most submitters agreed that there should be a requirement for a NZ CRS to support the Aotearoa New Zealand refillables market. These submitters noted that targets could encourage uptake of refillables by the beverage industry and consumer, and move Aotearoa New Zealand towards a more circular economy. A range of submitters reinforced that any scheme needed to be as simple as possible.

The overall scheme design should be kept as simple as possible to promote adoption, minimise cost and confusion, and achieve the outcomes. We support the future inclusion of refillable bottles, as this aligns with the environmental goals of the act. To the extent that additional requirements and targets add complexity and dilute focus on key outcomes, we advocate keeping the scheme as simple as possible. – Garage Project (20284)

A few submitters maintained that there should not be a requirement for the NZ CRS to support the refillables market.

Further investigation of this developing market should be conducted, and options considered separate to the CRS. – Sanitarium Health Food Company (20316)

Some submitters focused specifically on the target example. There were mixed views on whether a refillables target would work effectively. While some submitters said that binding targets should keep key players accountable in supporting the progress of refillable systems, others said that targets would not provide enough of an incentive. These submitters suggested that financial benefits or rebates from the NZ CRS could be used to effectively support the refillable market.

Manufacturers need both targets to encourage them and the support to make the changes required by the target dates. – Our Daily Waste (20092)

## 8.6. Promoting and incentivising the uptake of refillable beverage containers

**Question 14:** Do you have any suggestions on how the Government could promote and incentivise the uptake of refillable beverage containers and other refillable containers more broadly?

Submitters suggested a broad range of ways the Government could promote and incentivise the uptake of refillable systems, which are outlined below.

### 8.6.1. Tax breaks and subsidies

Submitters saw subsidies as more encouraging than penalties, which could act as barriers to companies funding refillable outputs. A few submitters noted that incentives should be used to assist companies to achieve refillable goals in a currently unsteady economic climate. Some submitters suggested tax breaks or subsidies for those who offered a refilling service.

Subsidies will incentivise those to engage and utilise a refilling service. – Brewers Guild of New Zealand (20265)

For New Zealand beverage companies, two years of Covid lockdowns, increased shipping prices, economic uncertainty and now the introduction of the CRS means that it is imperative that the New Zealand Government does not consider penalties to promote the uptake of refillable container targets. The Government could incentivise companies to achieve refillable targets by offering incentives such as a reduction in payroll tax for participation in the program. – International Council of Beverage Associations – Asia Pacific Regional Group (20293)

### 8.6.2. Financial assistance

Some submitters, including breweries and those in the packaging industry who produce largely single-use products, suggested that financial assistance should be given to companies with the start-up costs of establishing refillable systems and infrastructure.

Specific and targeted funding support needs to be set aside for reuse and refill schemes.  
– Plastics New Zealand Inc (21425)

Tax incentives or pilots for innovative reuse models. Supporting development of standardised reusable bottles to reduce costs and logistical complexity. – WasteMINZ Recycling & Resource Recovery Sector Group (20147)

### 8.6.3. Infrastructure

Some submitters emphasised the need for readily accessible refillable services throughout public areas, such as drinking fountains or ‘drop-and-swap systems’, which allow people to easily access and use refillable drop-off points. The success of the refillable market was seen as dependent on ease of accessibility and simplicity.

Yes, Government leadership and investment is integral to the success of uptake and ongoing use of refillables. It is important that the Government does not underestimate the investment required in this space; supporting policy must be imbedded alongside binding refillables targets and consequences for industry failing to meet those targets. From the onset the infrastructure required must be designed and built to accommodate refillable systems and enable easy access for all New Zealanders. In line with the Plastics Innovation Fund, Government should provide investment in washing facilities for refillables and pilots to demonstrate reuse models. – WasteMINZ on behalf of Territorial Authorities Officers Forum (20163)

### 8.6.4. Other suggestions

Other suggestions included further guidance and educating the public on the importance of reusable systems and products, as well as introducing an eco-tax on single-use packaging to disincentivise its use.

## 8.7. Other beverage packaging types or products for exemption

**Question 15:** Are there any other beverage packaging types or products that should be considered for exemption?

Submission type	Option	Total	Per cent
-----------------	--------	-------	----------

Detailed	Yes	25	14%
	No	160	86%
	<b>Total responses</b>	<b>185</b>	

Some submitters said there should be no more exemptions than those proposed, or none at all, as the success of the scheme depends on keeping it simple and having a broad scope. Other submitters did suggest a range of other products that should be exempt from the NZ CRS, including glass bottles, non-dairy milks, and medicinal and nutritional drinks and pouches.

Producers of glass bottles, particularly those in the alcohol industry, recommended glass bottles be exempted from the NZ CRS to maintain high levels of recovery and limit costs. A few submitters also noted that alcohol and other beverages in glass packaging are consumed in the home or commercial environments. Accordingly, they were not left outside as litter and were recycled in high quantities, in the same way as milk bottles.

As noted earlier in this document DB supports the exemption of glass from the CRS and supports the Glass Packaging Forum's alternative solution of an extended producer responsibility model. Glass collected through reverse vending machines requires further financial analysis. Global designs show the material value is extremely low for the collection cost. As previously mentioned, glass is infinitely recyclable and can be recycled onshore in New Zealand. A CRS should ensure quality of material so it can meet recovery targets but also improve recycling. DB submits this is high cost, low reward under the CRS model and the return of glass to furnace is best achieved via standardised kerbside.  
– DB Breweries (20275)

Some submitters also mentioned that tax increases on alcohol products in glass bottles had increased recently, making them an already highly taxed item.

Non-dairy alternative milks were proposed as an exemption by submitters because this was seen as a matter of equity between dairy and non-dairy products, as discussed in [Question 8](#).

Some submitters, including industry associations and NGOs, suggested that medical and nutritional products should also be exempt from the NZ CRS, and provided definitions.

We believe specialised medical nutrition products should be exempt under the scheme. These products are usually consumed in a hospital or institutional setting, or by 'at home' patients, and include: (a) Foods for special medical purposes (FSMP products), which are regulated under Food Standard 2.9.5 of the Australia and New Zealand Food Standards Code (FSC). Liquid FSMP products include tube feeds and oral nutritional supplements. They are used under medical supervision to manage the diets of people with certain diseases, disorders or medical conditions whose nutritional requirements cannot be met by normal foods alone. – Nestle New Zealand (20197)

A few submitters considered that requiring unwell home patients to return containers to collection points would place financial and physical burdens on those who are already in vulnerable positions.

## 9. Beverage container size

Please refer to Table 1 for quantification of submitters.

### 9.1. Size of eligible beverage containers to be 3 litres and smaller

**Question 16:** Do you agree that the size of eligible beverages containers would be three litres and smaller?

Submission type	Option	Total	Per cent
Detailed	Yes	164	77%
	No	49	23%
	<b>Total responses</b>	<b>213</b>	

Most submitters supported the proposal that eligible beverage containers would be three litres or smaller. They maintained this would capture most beverages that are consumed, and the infrastructure needed to process containers of this size was mostly available. A few submitters added that containers over three litres did not need to be included as anything larger than this usually relates to food service sector related containers and can be managed independently.

Containers over three litres were cited as being a very small portion of overall supermarket sales and could be dealt with in a nationally consistent way. Further, some councils commented that the proposed container size was nationally consistent with current kerbside recycling systems. A few submitters mentioned that large containers might cause health and safety risks to those handling and processing them, as they were often used to store chemicals and petrol.

Some submitters opposed the proposed size as they recommended all containers be able to be recycled. A few submitters qualified this by noting that large containers would not be able to be recycled at all available NZ CRS locations, but there should be the option to recycle them at depots or select NZ CRS locations. Submitters proposed a range of alternative sizes, including up to 20 litres, to align with some European countries. A few submitters, including Packaging NZ, also raised concerns that infrastructure would not be available to process large containers. For example, they noted that if RVMs were to be used, these would not be able to support large containers. The required infrastructure needed to be considered first.

A few submitters noted that there should be a lower size limit, such as 100mL, as in all European schemes, given that automated return systems are unable to accurately manage most containers below 100mL.

## 10. Beverage container lids

Please refer to Table 1 for quantification of submitters.

### 10.1. Returning containers with lids on

**Question 17:** Do you think that consumers should be encouraged to put lids back on their containers (if possible) before they return them for recycling under the scheme?

Submission type	Option	Total	Per cent
Detailed	Yes	145	76%
	No	45	24%
	Total responses	190	

Most submitters said people should be encouraged to put lids back on their containers, as they are a common and dangerous litter type that could cause environmental harm, such as risk to marine life. These submitters considered that as many products as possible should be recycled, and if putting lids back on containers was the most effective way to stop them becoming litter, then this should be encouraged, to support higher levels of recycling. Above all, these submitters said that the return of products needed to be simple and easy for consumers.

Those dealing with waste, such as recyclers, mostly agreed that lids should be left on, as this often helps to limit contamination and could divert lids from landfill. These submitters noted that appropriate technology and processes must be in place to ensure lids are recovered and reprocessed effectively.

Neutral as to whether on or off but they must be returned. If the intent of the CRS is to reduce litter and make the CRS simple then the container and its lid (either on or off), must be returned for refund. Producers have been redesigning packaging to ensure that both lid and container are recyclable, and this investment will be wasted if the lid is not accepted by the CRS system or at kerbside. The technology exists to handle containers and lids/caps, it just needs to be applied. – Soft Plastic Recycling Scheme (20319)

There is a reasonable amount of desirable material in the lids of plastic containers that can be recovered and reprocessed. We would like to see this diverted from landfill. There is also a global trend towards tethered caps to ensure that lids stay with their containers. Any move to exclude lids would cause confusion when these containers reach NZ shores. – Plastics New Zealand Inc (21425)

In the case of glass this would require extra sorting and present a higher risk of contamination at beneficiation. – Glass Packaging Forum (20336)

A few submitters did not agree with the proposal. Some of these submitters were concerned that re-screwing lids onto the containers they came with would potentially cause hygiene issues.

Other submitters raised that glass bottles also have non-screw-top crown seals, which means it may not be feasible to return them.

Unless the lid is made of the same material as the container, this would not work, and we suspect would incur extra sorting. – Brewers Guild of New Zealand (20265)

Further, some of these submitters raised that containers without lids were better for processing infrastructure, as they could be compressed more easily.

A few submitters considered that, while lids should be recycled through the NZ CRS, they should not necessarily need to be returned screwed onto their corresponding container. Some councils expressed concerns about consistency of messaging between NZ CRS and kerbside systems, with kerbside not requiring lids. For the schemes to be effective, submitters maintained they needed to be streamlined and have consistent messaging.

## 10.2. Alternative means to capture and recycle beverage container lids

**Question 18:** Do you agree that the scheme should provide alternative means to capture and recycle beverage container lids that cannot be put back on containers? If so, how should they be collected?

Submission type	Option	Total	Per cent
Detailed	Yes	166	88%
	No	23	12%
	<b>Total responses</b>	<b>189</b>	

Most submitters agreed there should be alternative ways to return lids, as they are a common type of litter that could be dangerous if not captured. Ideas for how to collect lids included introducing:

- an additional small fee on to bottle caps and lids (eg, five cents)
- small slot/RVMs to feed lids into for instant cash back
- separate bins at supermarket and other collection points for lids to be deposited separately from their container.

Some submitters suggested that lids should not necessarily need to be attached or re-matched up with their corresponding container, but could in fact be repurposed into a new product or lid type. Technology would need to be developed to ensure this could happen, and funding may be necessary to ensure processing companies could facilitate this.

MfE needs to investigate and invest in infrastructure which can capture lids so this material does not go to landfill. The best solution should be applied, whether this is a separate collection system, bottles required to have an attached lid or changing both the CRS and kerbside together to include lids. – Waikato Regional Council (20380) and South Waikato District Council (20320)

# 11. Return network

Please refer to Table 1 for quantification of submitters.

## 11.1. A mixed-return model with mandated retail participation

**Question 19:** Do you agree that a NZ CRS should use a 'mixed-return model' with a high degree of mandated retail participation to ensure consumers have easy access to container return/refund points, as well as the opportunity for voluntary participation in the network by interested parties?

Most schemes overseas use legislation or regulations to require retailers that sell beverages to take back empty containers and provide the refund ('mandatory return to retail'). This ensures that consumers are guaranteed convenient return points at places such as supermarkets, dairies, bottle shops and petrol stations. This approach to container return facilities (CRFs) is common in European schemes and is also used in the United States and Canada, but not in Australia.

A mixed-return model would provide accessible and convenient (and importantly, transport- and emissions-efficient) return points at places that people regularly visit. Supermarkets are also well located to service most of Aotearoa New Zealand, including rural communities, which will help to ensure good network coverage for at least 95 per cent of New Zealanders. In a mixed-return model, most return points (in supermarkets) would be established through regulations.

Submission type	Option	Total	Per cent
Detailed	Yes	189	86%
	No	30	14%
	Total responses	219	

Most submitters (including individual, local government, NGOs, and some industry submitters) agreed that an NZ CRS should use a 'mixed-return model'. The Kiwi Bottle Drive pro forma submission supported a mixed model network but promoted having more depots than set out in the proposals. Many individual submitters considered a mixed-return model the most convenient for consumers.

This model provides consumer convenience to return containers which will ultimately drive a high recovery rate in the program, as opposed to setting a high deposit amount. A mixed return model that includes mandated return- to-retail, as well as return points operated by community groups and private companies (alongside standard kerbside collection) will give consumers greater choice in where to return their containers, leading to higher return rates. – International Council of Beverage Associations – Asia Pacific Regional Group (20293)

### 11.1.1. Support for mandated retail participation

Many submitters considered easy access to return and refund points an essential part of a successful NZ CRS and consumer behaviour change, and thus were in support of mandated

retail participation. A few submitters cited high-performing European NZ CRS models with mandated retail participation as evidence for their support for the NZ CRS proposal.

The model proposed by the New Zealand Government strikes the perfect balance between ensuring the beverage supply chain plays an integral role in the return and recycling of drink containers whilst also providing for the continuation of the work communities and charities have historically played in recycling and litter collection in New Zealand. The scheme the New Zealand Government has proposed is based on the best practice 'Return to Retail' model which consistently sees container return rates above 90% due to the ability for consumers to return their containers and receive their deposit at any retail location that sells eligible beverages. The success of the best international container return schemes relies on a model that ensures individuals can conveniently return their containers at places which they visit regularly to shop whilst simultaneously creating jobs in the Circular Economy. This not only drives the highest participation, but also minimises time and travel cost burdens on consumers. – TOMRA (20379)

Submitters who supported the Kiwi Bottle Drive form submission agreed that this model would provide a diverse range of drop-off points that a range of communities could access.

I strongly support the proposed mixed return model that combines a nationwide network of depots (eg, drop off points at Community Recycling Centres/Zero Waste hubs) with some mandatory return to retail (eg, Reverse Vending Machines at supermarkets). A mixed-return model is most convenient because it provides a diverse range of drop-off points and ensures accessibility for all communities. I want to see more Container Return Scheme depots than what the Government currently proposes. – Kiwi Bottle Drive pro forma submission (21290)

A few submitters supported a mixed-return model but sought clarity on how the network would work in practice, particularly to ensure uptake from retailers.

Some submitters noted that some mandatory participation could be required alongside voluntary participation for charities, iwi organisations, etc.

Yes, we support a mixed return model including mandatory retail participation but with greater focus on the community recycling/resource recovery hubs operating as depots. Voluntary participation in the network is also fully supported to make return/refund points widely accessible and the scheme will be more successful. – Taranaki Solid Waste Management Committee (21450)

### **11.1.2. Concerns about mandated retail participation**

Submitters who disagreed with a mixed-return model were mostly businesses, and some industry associations. These submitters largely disagreed with the mandated retail participation aspect of the proposal and were concerned about space and cost issues for retailers. Some individual submitters were concerned that increased costs would be passed down to consumers, while some business and industry submitters were concerned that mandated retail participation would undermine responsibilities of producers, the Government, and any managing agency to work towards more sustainable practices, shifting this to the retailers themselves.

Mandatory return to retail would result in higher network handling fees, stifle innovation in collection, prevent involvement of charities and community groups as refund point operators (a major scheme objective), and would impact the viability of other return



point types (ie, achievement of a varied network). We support a balanced and viable network with a range of collectors and return point types to drive the highest return rates.  
– The Packaging Forum (20308)

Many of these submitters suggested alternative return models, such as voluntary retail participation, or a hybrid returns network that combined retail collection and a network of resource recovery centres. Some submitters were concerned about the balance of return points and considered a 50/50 split between supermarkets and other retailers to be more appropriate.

Some submitters from a range of submitter types highlighted the importance of ensuring any proposed model works to coordinate with existing collection networks and build on existing waste minimisation initiatives from stakeholders like local government, NGOs, and registered charities. Some submitters, including those that supported the Kiwi Bottle Drive form submission, wanted to see more procurement of Māori-led businesses, iwi, and other social and community enterprises that would support better social, economic and environmental wellbeing in local communities.

Supermarket submitters did not support mandated retail participation. These submitters supported voluntary participation in the scheme, explaining that this approach would ensure consumer accessibility and scheme costs are balanced.

No, Foodstuffs does not support mandatory retail participation requiring take-back of beverage containers by certain retailers. Mandatory retail take-back is a blunt and inflexible approach. We support a broad, diverse network of mixed-return points with voluntary retail participation and container return/refund points offered through depot return facilities, recyclers, community organisations as well an option for retailers to voluntarily participate in the scheme. – Foodstuffs NZ (20282)

WWNZ wants to play its part to support a national collection network, but we want to do this where it will be successful. CRFs can present significant logistical difficulties and not all supermarkets are well positioned to accommodate Reverse Vending Machines (RVMs). Inappropriate siting of RVMs can lead to significant negative impacts on community amenity, and in some cases, result in illegal activity that is difficult to manage. Our teams are not waste management operators or experts, and their safety is of critical importance to us. – Woolworths New Zealand (20388)

## 11.2. Preferred locations for returning containers

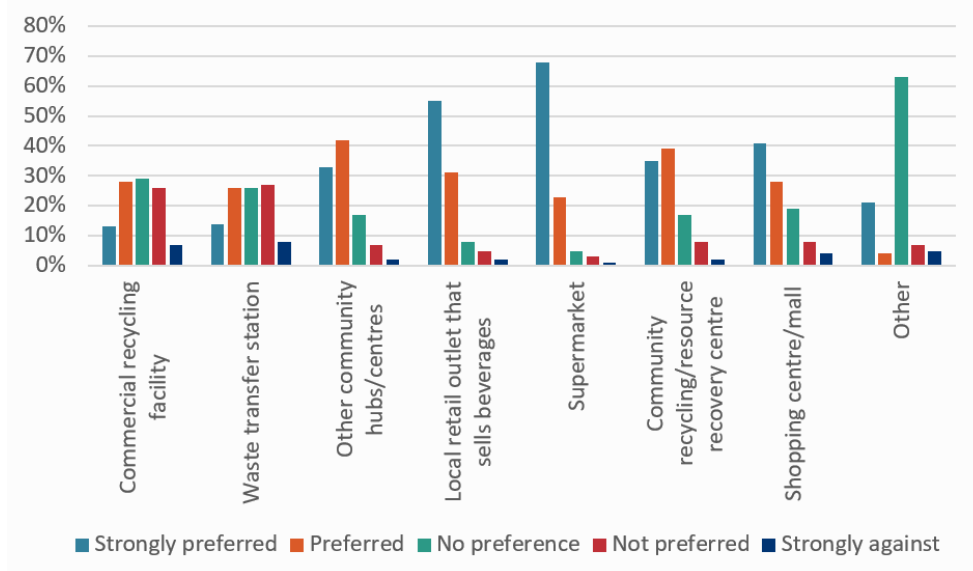
**Question 20:** Where would you find it easiest to return eligible beverage containers?  
Please select all that are relevant and rank these from most preferred to least preferred.

- Commercial recycling facility (eg, depot, more likely to be located in industrial zone)
- Waste transfer station
- Other community centres/hubs (eg, town hall, sports club, etc)
- Local retail outlet that sells beverages (eg, dairy, convenience store, bottle shop, petrol station)
- Supermarket
- Community recycling/resource recovery centre

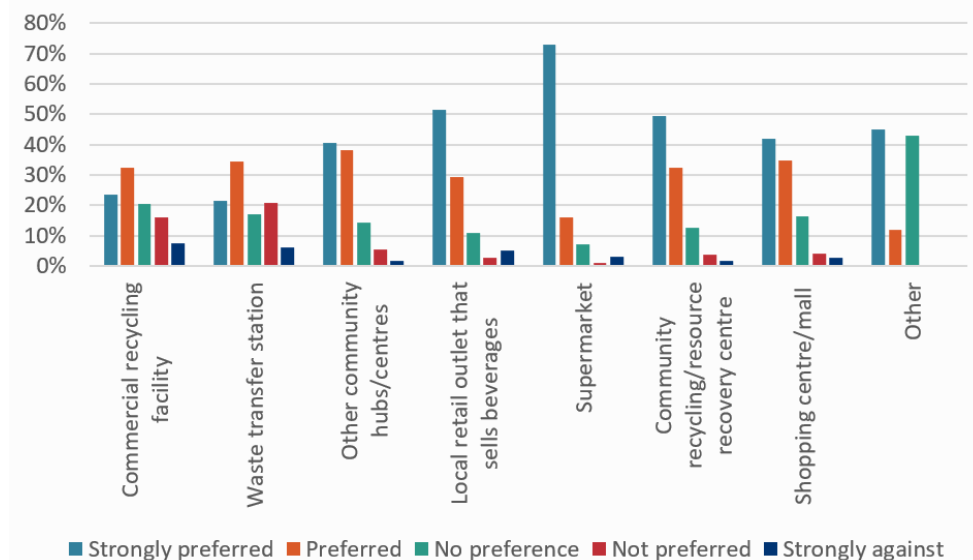
- Shopping centre/mall
- Other, please specify

Figures 4, 5 and 6 present the percentages of submissions received in response to Question 20 across four preference options: 'Strongly preferred', 'Preferred', 'No preference', 'Not preferred' and 'Strongly against'. Data presented in these figures have only been counted where the listed options were chosen.

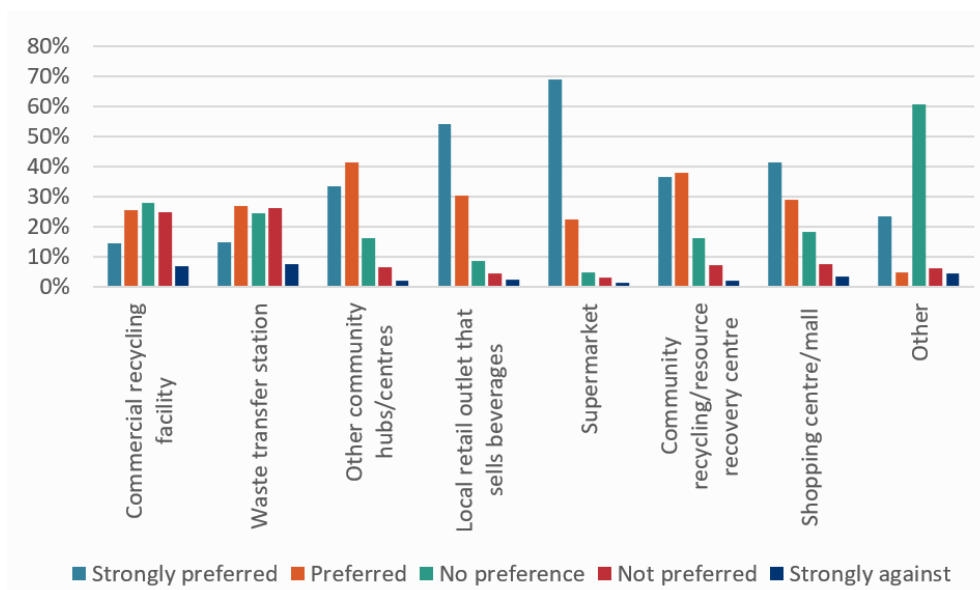
**Figure 4: Where would you find it easiest to return eligible beverage containers?**  
**Short-form submissions**



**Figure 5: Where would you find it easiest to return eligible beverage containers?**  
**Detailed submissions**



**Figure 6: Where would you find it easiest to return eligible beverage containers? Combined short-form and detailed submissions**



Most submitters across a range of submitter types supported a diverse, convenient return network, with containers being returned at all available locations. Supermarkets were the most popular return location across individual submitters. These submitters reasoned that ease and convenience would play the biggest part in the community participating, and therefore having as many options available as possible would be crucial to a successful NZ CRS.

We favour all and any of these points being available to give consumers choice. This will give the Scheme Management Agency the opportunity to balance the collection points with options for consumers and the costs involved. – Sanitarium Health Food Company (20316)

However, a few industry submitters were concerned about the operational costs of a high number of return points.

In our view, over-determining the collection structure could also increase network costs, and exclude other community operators and the potential fundraising opportunities that arise in overseas examples. For example, if it is mandatory for supermarkets to provide CRFs in the order of 700 sites as modelled in the consultation document, this would be at a much higher penetration rate per capita than Australia, and will increase the network operation costs, while likely undermining the viability of community-run schemes. – Woolworths New Zealand (20388)

Some submitters considered that any NZ CRS should optimise and expand current networks, such as kerbside recycling, rather than focusing on return points.

Some submitters raised concerns about a ‘one-size-fits-all’ approach, noting that the types of return points available need to be considered (eg, commercial returns vs household returns). Other submitters suggested that the collection/refund methodology may need to differ between return points (ie, waste transfer stations are not usually staffed, so cash refunds may not be viable). A few submitters noted that people in rural areas will generally have to travel further, and any NZ CRS should not create access inequities.

Many submitters supported RVMs as a return option. A few industry submitters were concerned that RVM mixed-crushed-glass machines would lead to lower levels of glass recycling than source-separated kerbside.

A few submitters noted the unique context of rural communities and the barriers they face in accessing recycling facilities. A few submitters noted that a number of accessible collection points would be required throughout a community and might be different to commonly designated drop-off points in urban areas. One submitter notes that small shops in rural areas would need to be included in the return network.

Consideration needs to be given to rural communities; eg, here in Hastings, Maraekakaho and Kereru have a successful convenient rural recycling station for this rural community. Rural communities will need to take their containers further afield and make it more complicated for them. We could rely on a school as a hub, but this facility will need administration, it adds a security risk for the school, etc. – Hastings District Council (20351)

Submitters suggested a range of other return points, including schools, home collections, universities, parks, cafes and petrol stations. Some submitters suggested that territorial authorities and other community stakeholders should be consulted on which locations are best for individual localities. Some submitters wanted any NZ CRS to have a priority focus on community hubs, marae, schools, and resource recovery centres.

The Forum recommends a priority focus on community hubs, marae, schools and resource recovery centres to encourage and build community resilience. Convenience is not the only consideration when returning containers; community connectedness, incidental education and bringing waste to the forefront of Kiwis' minds are all priorities, [and] these benefits are much less accessible at supermarket deposits. For example, by including community recycling/resource recovery centres as return facilities, it provides an opportunity to highlight other waste diversion options, promote zero-waste living, and create green jobs for local communities. – TAO Forum (20376)

## 11.3. Minimum store thresholds for beverage retailers

**Question 21:** Retailers that sell beverages are proposed to be regulated as part of the network (mandatory return-to-retail requirements). Should a minimum store-size threshold apply?

Submission type	Option	Total	Per cent
Detailed	Yes	106	60%
	No	72	40%
	<b>Total responses</b>	<b>178</b>	

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

- Over 100 m<sup>2</sup> (many smaller dairies likely exempt)
- Over 200 m<sup>2</sup> (many dairies and some petrol stations likely exempt)
- Over 300 m<sup>2</sup> (many retailers, dairies, petrol stations and smaller supermarkets likely exempt)

Submission type	Option	Total	Per cent
Detailed	Over 100 m <sup>2</sup>	40	41%
	Over 200 m <sup>2</sup>	27	28%
	Over 300 m <sup>2</sup>	30	31%
	<b>Total responses</b>	<b>97</b>	

Many submitters supported a minimum store-size threshold for beverage retailers. Most of these were individuals. There were mixed views among organisations with regard to a minimum threshold. Some submitters supported this proposal, stating that it needed to be easy for consumers to access locations near them, regardless of whether they lived in urban or rural areas. A few of these submitters considered it important for retailers selling single-use containers to play their part in a NZ CRS, stating that such retailers need to realise that they have responsibilities when selling single use containers (although the level of responsibility should be in keeping with their size and complexity of their business).

Some other submitters, mostly businesses and industry associations, did not support a minimum store-size threshold. These submitters disagreed with the premise of mandated return to retail and referred to comments under [Question 19](#).

HWL opposes mandated retail participation and therefore opposes any constraints on minimum size of retailer. This is particularly significant with the recent publication of the Grocery Market Study Report. Mandating supermarkets/retailers according to size simply consolidates the position of supermarkets in the system further reducing market competition and acts as yet another barrier to new grocery retailers (ie, The Warehouse).  
– Heinz Wattie’s Ltd (20389)

Submitters supported a range of suggested minimum store-size thresholds, with most supporting over 100 m<sup>2</sup> and some supporting 200 m<sup>2</sup> and 300 m<sup>2</sup>. A few submitters said that they would be happy to take back their own companies’ containers, but not those of other brands, due to storage space shortages.

Some submitters did not support minimum floor size to be an appropriate measure, favouring other measures such as population density, proximity to other return points, and what products are sold at each retail location. A few submitters wanted to clarify how this proposal would work in practice and were concerned that return to retail could become confusing for users if they could return to one type of retail location (such as a petrol station) but not another, solely because of size.

## 11.4. Shop-floor-size requirements for rural retailers

**Question 22:** Do you think the shop-floor-size requirements for retailers required to take back beverage containers (mandatory return to retail) should differ between rural and urban locations?

Submission type	Option	Total	Per cent
Detailed	Yes	81	48%
	No	87	52%
	<b>Total responses</b>	<b>168</b>	

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

- Over 60 m<sup>2</sup> (as in Lithuania)
- Over 100 m<sup>2</sup> (many smaller dairies likely exempt)
- Over 200 m<sup>2</sup> (many dairies and some petrol stations likely exempt)
- Over 300 m<sup>2</sup> (many retailers, dairies, petrol stations and smaller supermarkets likely exempt)

Submission type	Option	Total	Per cent
Detailed	Over 60 m <sup>2</sup>	31	49%
	Over 100 m <sup>2</sup>	18	29%
	Over 200 m <sup>2</sup>	8	13%
	Over 300 m <sup>2</sup>	6	9%
	<b>Total responses</b>	<b>63</b>	

There were mixed views on whether shop-floor-size requirements should differ between rural and urban locations. Some submitters agreed that there should be a lower size threshold for rural retailers, so that small businesses in rural areas would not be overburdened. Most of these submitters said that 60 m<sup>2</sup> or 100 m<sup>2</sup> should apply in rural areas, and a few submitters said 200 m<sup>2</sup> or 300 m<sup>2</sup>.

The Council agrees that smaller retailers should be included in the mandatory scheme in rural areas or villages to enable good access for rural communities. – Tasman District Council (21441)

A few submitters said that having a different store size for urban and rural communities would overcomplicate an NZ CRS and its implementation. Other submitters commented that some retailers did not have the capacity to become a return point, in terms of space and cost.

This is too complicated and unfair. The modelling in the regulatory impact statement seems to be based upon 1 collection point per 6,623 people. This would lead to very low numbers of collection points in some areas and no collection points in some of the 'urban centres' (with a population of over 1,000 people) listed in Part 2 of the consultation. The scheme must be required to provide collection points throughout the country. – Whangārei District Council (20139)

Some submitters referred to their answers in [Question 19](#) and [Question 20](#), where they did not support a mandated return-to-retail model, or their answers to [Question 21](#), where they did not support floor size as an appropriate measure. Many submitters offered alternative solutions to these proposals, such as delivery services like those in Germany or Norway, mobile collection services, or the use of community venues as return points. A few submitters suggested other factors when deciding which rural retailers to include – such as proximity to depots, sales of beverage containers per annum, and the fact that people living rurally may stockpile recycling – to ensure return points with a large receiving capacity are available.

## 11.5. Exemptions for retailer participation

**Question 23:** Do you agree that there should be other exemptions for retailer participation? (For example, if there is another return site nearby, or for health and safety or food safety reasons).

Submission type	Option	Total	Per cent
Detailed	Yes	128	72%
	No	50	28%
	<b>Total responses</b>	<b>178</b>	

Many submitters agreed that there should be exemptions for retailer participation. Some of these submitters wanted exemptions to support scheme efficiency – for example, where two retailers are very close together or very close to a depot return point, or where a retailer is part of a multi-shop complex/shopping mall. Other submitters suggested there could be a minimum number of providers in a particular area, with exemptions only available if the minimum number is reached. A few industry associations said they thought the return network should be voluntary so retailers could opt in and out when they wanted to.

CODC supports retailers being able to apply for an exemption and would like this to be a robust process. A deciding point would be to ensure there is a good coverage of convenient return points, particularly rurally. We would prefer to see those smaller rural retailers being supported to enable this, rather than receive exemption, in order to maintain a convenient and accessible network. – Central Otago District Council (20130)

Some submitters did not agree that there should be exemptions for retailers. A few submitters thought that any exemptions would cause confusion for users about where they could and could not return their containers. A few submitters were concerned that businesses would use exemptions to avoid participating in the scheme, noting that it would be simpler to just stick to floor size as the only criterion for exemption.

## 12. Scheme performance

Please refer to Table 1 for quantification of submitters.

### 12.1. Not-for-profit, industry-led NZ CRS

**Question 25:** Do you agree with a NZ CRS that would be a not-for-profit, industry-led scheme?

Submission type	Option	Total	Per cent
Detailed	Yes	163	76%
	No	51	24%
	Total responses	214	

Most submitters supported a not-for-profit NZ CRS. However, many of these submitters, including those that supported the Kiwi Bottle Drive pro forma submission raised concerns about the prospect of the scheme being industry led.

Some submitters wanted the Ministry to explore more opportunities to enable marae, community groups, and not-for-profit organisations to become return points, so that they could benefit from a NZ CRS. Many DHB submitters highlighted that this had been successful overseas in locations like Queensland and California. Many submitters wanted the community involved in the governance of the scheme, to support positive outcomes for communities.

#### 12.1.1. Support for not-for-profit and industry-led scheme

Submitters who supported a not-for-profit and industry-led scheme included industry associations, some businesses, and some local government submitters.

The Brewers Guild supports the Ministry's intention for a regulated product stewardship programme that is industry led and not for profit. We are committed to playing our part to achieve the best possible sustainability outcomes for New Zealand. – Brewers Guild (20414)

Many industry associations specified that any stakeholder who would stand to profit from such a scheme should not be involved in decision-making in the managing agency. However, those who supported the Zero Waste Network submission did not think that a not-for-profit scheme was critical to the scheme design. These submitters instead emphasised the need for clear objectives aligned with public interests to deliver an effective NZ CRS that drives a transition to a circular economy.

These industry association submitters highlighted that a not-for-profit scheme would perform better and reduce costs for participants, as per examples from other jurisdictions.

Yes, NZFGC is firmly of the view that the scheme should be a not-for-profit, industry-led scheme. Where schemes are for profit (eg, Bulgaria, Estonia, Germany, Poland, Romania, Slovenia) there has been an increase in Producer Responsibility Organisations operating as vertically integrated entities (see Q26) competing with each other to attract companies to sign up to their own scheme and even, as in the case in Estonia, to compete on the



infrastructure by offering their own containers to consumers. – New Zealand Food and Grocery Council (20362)

### **12.1.2. Do not support industry-led scheme**

Many submitters across a range of submitter types supported a not-for-profit scheme but did not support it being industry led. These submitters were concerned about conflicts of interest and politics across industry associations and warned that industry leading the scheme would result in a small number of larger associations dominating decision-making.

We are concerned that an industry-led managing agency is likely to be either dysfunctional or lack adequate representation of the range of views and interests in the sector, let alone the wider public interest, given the lack of consensus amongst the beverage industry with regard to the concept of [a] CRS at all, as well as how it should be designed and financed... We also believe that if the agency is both non-profit and industry led, it is likely to be dominated by major (probably multinational) beverage interests, who may not represent the views of smaller beverage companies, let alone the wider public interest.  
– New Zealand Product Stewardship Council (20208)

Some submitters emphasised that the proposed regulated framework was not sufficient to justify an industry-led scheme and noted that the goals of the managing agency will need to be broader than just achieving high return rates, which instead justifies an independent decision-maker.

It is important that the scheme is led by an independent agency to ensure the best outcomes for all stakeholders including, but not limited to, Councils, community groups and Mana Whenua. ...The managing agency should have broader goals than simply achieving high return rates, for example: developing a fully accessible depot network, supporting the refillables market and circular economy, other positive public good outcomes. – TAO forum (20376)

These submitters said that governance of such a scheme will need to represent diverse stakeholders, not just industry, and called for the managing agency to be based on Te Tiriti partnerships, with Māori engaged on all levels of the scheme.

Auckland Council sees it is crucial that the scheme managing agency structure, function, form and governance is not limited to one or select stakeholder group/s but reflects and represents the diversity of stakeholders that make up and participate in a CRS – both at the level of scheme management and governance. This will ensure that all interests are represented in decision-making, mitigating against risks of serving limited interests. More diverse governance and management also means decision-making can benefit from a broader base of knowledge, skills and experience. We think that Māori, community and local government involvement is especially crucial to ensure performance of the scheme meets a wide range of outcomes including cultural, social, and environment outcomes which should be built into the supporting legislation. – Auckland Council (20402)

## 13. Implementation

Please refer to Table 1 for quantification of submitters.

### 13.1. Recovery targets for a NZ CRS

**Question 26:** Do you agree with the recovery targets for a NZ CRS of 85 per cent by year 3, and 90 per cent by year 5?

Submission type	Option	Total	Per cent
Detailed	Yes	178	85%
	No	31	15%
	Total responses	209	

Most submitters, including individuals, local government and NGOs, supported proposed targets and their timelines. Some of these submitters highlighted that having ambitious or aspirational targets would be necessary to make significant progress towards positive behaviour change and a circular economy.

We support the proposed recovery targets. We hope that New Zealand can join other high-performing countries that have proven that such ambitious targets are achievable (Germany, Denmark, Finland, Croatia, Netherlands, Iceland, Norway, Sweden, Lithuania). The setting of these targets depends on the successful incorporation of strong design characteristics, which allow for a high-performing scheme. – Wellington City Council (21443)

A few submitters, such as industry associations and some businesses, did not agree with the recovery targets being set at 85 per cent by year 3 and 90 per cent by year 5. These submitters generally supported having targets in place, but did not think the proposed recovery rates and timelines were feasible, highlighting that Aotearoa New Zealand consumers currently have a low awareness of the proposed NZ CRS and have not been involved in the scheme to date. Some submitters thought that there was a low level of reliable data to support setting such targets in the development phase of a NZ CRS.

No, we do not support the high recovery targets proposed. We do support the scheme having clear recovery targets. Nonetheless, it is difficult to set recovery targets when the scheme is still in development and the final scope is yet to be agreed. The proposed recovery targets are very ambitious, as they are based on international recovery rates for well-established schemes (Germany implemented its scheme in 2003; and Finland implemented its scheme in the 1950s, involving automated bottle return machines and expanding the system to include plastic bottles in the 2000s). Changing the behaviour of New Zealanders in the short term will be challenging. – New Zealand Food and Grocery Council (20362)

A few submitters who disagreed with the proposed targets thought they needed to be more ambitious and be implemented sooner. A few submitters wanted the Ministry to ensure that recovery rates were not the only sign of success considered, as recovered containers would still need to be recycled.

## 13.2. Reviewing the scheme design

**Question 27:** If the scheme does not meet its recovery targets, do you agree that the scheme design (including the deposit level) should be reviewed and possibly increased?

Submission type	Option	Total	Per cent
Detailed	Yes	194	92%
	No	17	8%
	Total responses	211	

Most submitters, across a range of submitter types, agreed that the scheme design should be reviewed if the scheme does not meet its recovery targets. Submitters generally agreed that it should be standard practice to regularly review schemes of this nature.

Yes, the CDHB suggest that the NZ CRS should be regularly reviewed. If the scheme does not meet these recovery targets for beverage containers, then the scheme needs to be reviewed and potentially container return facilities need to be increased to make it easier for consumers to participate in the scheme. – Canterbury District Health Board<sup>19</sup> (20333)

While most submitters agreed with regularly reviewing targets, some did not agree that deposit levels should be increased if the scheme did not meet its targets, particularly in the first round of review, noting that this could burden consumers.

Caution should be taken to increase the deposit level so that beverage prices are not increased significantly before the effectiveness of the scheme in New Zealand can be known. For example, raising beverage prices by 50 cents would be harmful for low-income households if the scheme is not implemented so that families can easily and reliably access their refunds. The scheme should not place undue burden on consumers and should prioritise ease of access to return points and ease of receiving deposit amounts (ie, through swiping an EFTPOS card rather than exclusively cash refunds).  
– Ngā Rangahautira (20119)

Many of these submitters highlighted that the deposit level is only one part of the scheme design. They noted that consumer education, generational change, barriers to return points, and accessibility of the scheme should all be considered alongside the deposit level when reviewing the scheme.

A few submitters noted that if the scheme failed to meet its targets, the onus should fall on the managing agency, and the agency should be reviewed in the first instance, not the deposit level.

---

<sup>19</sup> See note 7, referencing the fact that DHBs have been disestablished, so this submission does not necessarily reflect the views of Te Whatu Ora.

# 14. Any other comments

Please refer to Table 1 for quantification of submitters.

**Question 30:** If you have any other comments, please write them here.

Some submitters commended the proposals and called for faster implementation. Others provided additional comments beyond the scope of the questions or consultation.

Some submitters emphasised the importance of aligning the scheme with existing plans and strategies, and noted the important link between climate change and scheme implementation. These submitters explained that the additional infrastructure, collection, and general implementation of the scheme could increase carbon emissions – and that local management should be prioritised to limit emissions – particularly those linked with freight and transport.

The Government is committed to creating: A low emissions, low waste and climate resilient future. A productive, sustainable and inclusive economy that lifts the wellbeing of us all. The design and delivery of the CRS could support these strategic goals much more directly. – Zero Waste Network and Para Kore (20263)

Further, a number of additional opportunities for communities were highlighted by some submitters as part of a NZ CRS. These included benefits for low-income communities and individuals, schools, and community groups, such as additional job opportunities, education opportunities, decreased litter and environmental damage from litter, and opportunities to innovate.

Some submitters noted that further integration of te ao Māori principles and consideration of Te Tiriti is needed throughout the scheme. Submitters maintained this is required in the way the scheme is designed, managed and implemented, and when thinking about expected outcomes. To do this, a partnership approach is suggested throughout management, governance, and all operational levels.

Embed the Te Tiriti partnership, integrating Māori values, tikanga, and Mātauranga Māori into the process of developing the scheme. The Tiriti partnership would enable local Māori enterprise opportunities, address inequities and provide multiple beneficial outcomes for local communities. – Zero Waste Network (20263) and Para Kore (21453)

A few submitters expressed concern about a lack of infrastructure within Aotearoa New Zealand for processing recycling. They suggested that further research be done to better understand capacity for dealing with various materials within Aotearoa New Zealand.

A few submitters noted that pilots could be used to test the scheme before rolling it out nationwide. It was noted by a few submitters that engagement at the local level would be important for successful implementation. This would help to take account of expertise and opinions across stakeholder groups and enable partnerships with existing organisations.

Some submitters noted that a register could be created for producers and distributors to report on volumes of material subject to the two schemes, and of material that is unrecyclable.

Some submitters noted that standardising product labelling would be important to help consumers understand what can and cannot be recycled. A few suggested aligning with the

Australian labelling system. It was noted that standard labelling would incur additional costs to manufacturers, but industry groups and manufacturers largely supported standard labelling.

We recommend that labelling should be harmonised with Australian schemes. Both countries recognise the Australia New Zealand Food Standards Code which sets requirements, particularly for the labelling and composition of food and food-related products... Adding unique identifying marks to New Zealand products would add to the cost of the scheme, particularly impacting smaller producers. – Coca-Cola Europacific Partners (20426)

Additionally, some submitters noted that councils would require planning support to ensure efficient services are provided, and disruption and uncertainty are minimised.

## **Part 2: Te whakapiki i te hangarua paeara ā kāinga – Improvements to household kerbside recycling**

# 15. Proposal 1: standard set of materials

Please refer to Table 1 for quantification of submitters.

## Status quo

Currently, no single material is collected for kerbside recycling by every local council in Aotearoa New Zealand. The types of materials collected varies considerably. For example, some councils do not collect glass, a handful do not collect paper, and the types of plastics collected vary widely. This variability is confusing to the public and contributes to increased contamination. Key issues in this space are:

- New Zealanders are confused about what can be recycled
- people risk losing confidence in recycling
- contamination levels are high
- recycling is put in the rubbish bin.

## Proposed changes

The Ministry proposes that any company or council that offers a household kerbside recycling collection should collect the same set of materials. Based on current collections, some materials would no longer be collected in certain areas, while materials would be added to collection services elsewhere.

### 15.1. Standard set of materials from households collected at kerbside

**Question 31:** Do you agree with the proposal that a standard set of materials should be collected for household recycling at kerbside?

Currently, councils collect different recycling materials in different regions. The consultation document proposed standardising the list of materials collected through kerbside initiatives.

Submission type	Option	Total	Per cent
Detailed	Yes	281	95%
	No	16	5%
	Total responses	297	

Most submitters agreed that a standard set of materials should be collected. The most common rationale for this view was to reduce confusion about what materials were collected through kerbside recycling.

This will reduce confusion for consumers and ensure that education can be national.  
Having moved between cities it is very confusing to have to learn and remember the

‘rules’ for what’s in and out of recycling bins. Particularly when that information is not readily available. – Individual (20216)

A few submitters, including several councils, highlighted implementation challenges. These challenges included the availability of processors and other infrastructure, acquiring assets such as bins and collateral, redesigning services, and ensuring the public is on board and understands the changes. Submitters noted that because there is not a standard set of materials across all councils, costs of standardisation and education will vary, and each council will face different challenges depending on the resources and context of the region.

Additionally, a few submitters mentioned that clear and standardised labelling would be needed to support implementation. Other challenges included funding required to update material-recycling facilities, and provide support for implementation and education campaigns. These submitters emphasised the need for greater financial support from central government and greater product stewardship from packaging producers to overcome the challenges.

Auckland Council recognises the benefits of standardising kerbside services to support waste minimisation as set out in the consultation document. However, we are concerned that more material may go to landfill if the proposed standard set of materials and the governance of the proposal is not robust ... We note that changes to materials collected will have financial impacts on councils, and we support efforts to move the responsibility for funding kerbside collections towards producers, including through a greater focus on product stewardship. Having an appropriate lead-in time and resources to support the move with public education and awareness campaigns coordinated nationwide and locally (refer Question 67) will be important. – Auckland Council (20402)

A few submitters also noted that circular-economy goals might be better achieved by keeping the standard set shorter and easy to implement. Councils could then be encouraged to voluntarily implement a wider catchment of recyclable materials.

Some submitters suggested changes to the proposal. While covered in proposal 2, the most common change was to include organic waste in kerbside pickups, with individual submitters wanting to include food scraps and organic waste in any new national kerbside programmes.

## 15.2. Councils collecting different material types

**Question 32:** Do you agree that councils collecting different material types (in addition to a standard set) might continue to cause public confusion and contamination of recycling?

Submission type	Option	Total	Per cent
Detailed	Yes	142	77%
	No	43	23%
	<b>Total responses</b>	<b>185</b>	

Most submitters agreed it was confusing for different councils to collect different materials.

Big supporter for national consistency in what can be recycled; it makes messaging much easier if we just have to put out one message nationally rather than per council. It is currently difficult to find clear information online per council. One standard website



where users can understand what can or can't be recycled in detail would be ideal.  
– Individual (20064)

A consistent approach to recycling will help local communities and New Zealand build a sustainable, long-lasting behaviour change. Dunedin City Council expects this proposal to have beneficial effects in the district as a significant part of the population is made of university students who may be from a different region and are used to a different recycling system. – Dunedin City Council (20079)

Some submitters noted that if there were a consistent set of materials, national communication and education campaigns may have a bigger impact in ensuring the correct materials were being recycled.

Waipā District Council agrees that some councils collecting extra materials (not collected everywhere else) would defeat the purpose of standardising recycling nationally. As a council in the Waikato region, we get a lot of new residents from larger cities, who bring their old recycling habits with them and they recycle as they always have, causing contamination. Having the same set of items collected all across the motu is where the benefit lies. – Waipā District Council (20069)

Some submitters noted that moving towards a nationally consistent set of materials for collection should not deter councils from collecting additional materials, if there were a viable end market for other materials. They proposed a minimum standard of materials should be collected, with councils able to collect more if they choose.

Foodstuffs supports the proposal to introduce a minimum standard for the materials that are to be collected for household recycling at kerbside. But this should not prevent councils collecting materials over and above the minimum standards set by Government if they have end-of-life solutions for those additional materials – Foodstuffs NZ (20282)

A few submitters discussed the need for education and noted that national consistency might not be necessary if local communication efforts were improved. They considered that confusion about what materials are accepted within different councils could be mitigated through targeted communication efforts.

A few submitters did not agree that it was necessary to have a standard list of collected materials across all councils. These submitters noted that, as most residents recycle within their own council boundaries, the materials that other councils collect would be irrelevant.

No, the public respond to the system they are interacting with. If people have moved from one location to another and the recycling system and/or range of materials are different, then this information needs to be articulated at a local/regional level. Standardising recycling acts in opposition to a stewardship approach as it can signal that we only collect resources that have a 'value' based on commodification. – Marlborough District Council (20071)

## 15.3. National consistency

**Question 33:** Do you think that national consistency can be achieved through voluntary measures, or is regulation required?

Submission type	Option	Total	Per cent
Detailed	Yes	19	10%
	No	178	90%

	<b>Total responses</b>	<b>197</b>
--	------------------------	------------

Most submitters noted that regulation would be required to achieve national consistency on a standardised set of materials collected at kerbside. Some of these submitters considered that voluntary measures have not worked well in the past, and thus should not be relied on in the future.

Nelson City Council supports regulation. The sooner that a consistent message is being provided across the country, the sooner perceptions about recycling not being effective can be addressed and permanent habits can be established. – Nelson City Council (20132)

A few submitters noted that if there were greater education, and better support were available to people and councils, national consistency could be achieved through voluntary measures.

## 15.4. Proposed items for a standard set of materials

**Question 34:** Please tick below all the items from the proposed list which you agree should be included in the standard set of materials that can be recycled in household kerbside collections.

- Glass bottles and jars
- Paper and cardboard
- Pizza boxes
- Steel and aluminium tins and cans
- Plastic bottles 1 (PET) and 2 (HDPE)
- Plastic containers and trays 1 (PET) and 2 (HDPE)
- Plastic containers 5 (PP)

### Short-form submissions

Material type	Total	Per cent
Glass bottles and jars	1,294	100%
Paper and cardboard	1,296	100%
Pizza boxes	1,046	81%
Steel and aluminium tins and cans	1,293	100%
Plastic bottles 1 (PET) and 2 (HDPE)	1,283	99%
Plastic containers and trays 1 (PET) and 2 (HDPE)	1,279	99%
Plastic containers 5 (PP)	1,265	98%
<b>Total responses</b>	<b>1,296</b>	

### Detailed submissions

Material type	Total	Per cent
Glass bottles and jars	185	100%
Paper and cardboard	181	98%
Pizza boxes	149	81%
Steel and aluminium tins and cans	183	99%

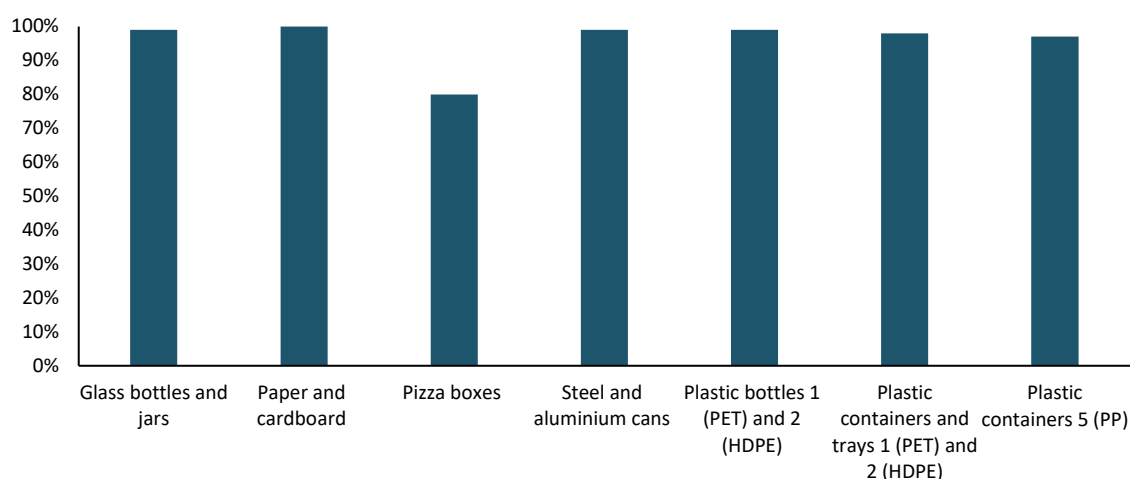
Plastic bottles 1 (PET) and 2 (HDPE)	180	97%
Plastic containers and trays 1 (PET) and 2 (HDPE)	179	97%
Plastic containers 5 (PP)	179	97%
<b>Total responses</b>	<b>185</b>	

### Combined responses

Material type	Total	Per cent
Glass bottles and jars	1,479	100%
Paper and cardboard	1,477	100%
Pizza boxes	1,195	81%
Steel and aluminium tins and cans	1,476	100%
Plastic bottles 1 (PET) and 2 (HDPE)	1,463	99%
Plastic containers and trays 1 (PET) and 2 (HDPE)	1,458	98%
Plastic containers 5 (PP)	1,444	98%
<b>Total responses</b>	<b>1,481</b>	

Figure 7 presents the combined short form and detailed submissions received in response to Question 34 as percentages across the seven options.

**Figure 7: Items which should be included in the standard set of materials that can be recycled in household kerbside collections. Combined short-form and detailed submissions**



Most submitters who answered this question said that all items listed should be included in the standard set of materials collected for recycling at kerbside. However, a few submitters commented that pizza boxes should either not be collected, or should be collected with organic waste instead of recycling due to their potential for food contamination. These comments are expanded on in [Question 35](#) below.

## 15.5. Proposed items that should be excluded

**Question 35:** If you think any of the materials above should be excluded, please explain which ones and why.

Some submitters said that no items should be excluded from the list provided. A few submitters suggested that food and drink packaging, particularly pizza boxes, should be excluded from collection. A few submitters were concerned that pizza boxes (and other soiled food packaging) would be contaminated by food or grease and should therefore be excluded from recycling collection. Some suggested that pizza boxes could be composted instead of recycled.

Pizza boxes. They reduce the quality and run the risk of still including pizza. Pizza boxes should be placed in the Organics bin. – Individual (20099)

A few submitters were concerned about the use of per-and polyfluoroalkyl substances (PFAS) chemicals in pizza boxes.

The inclusion of pizza boxes is a bit concerning given they often contain PFAS. We support regulations that phase out use of PFAS in packaging before pizza boxes are accepted for kerbside and/or accepted for organics recycling to ensure PFAS isn't being introduced to recycled paper streams, waterways and soil. – Protect Our Winters NZ (20201)

A few submitters suggested that LPB should be excluded from collection, despite not being included in the list provided in the consultation document. Submitters cited their answers to [Question 6](#), which outlined their concerns about the inclusion of LPB.

We have concerns over the inclusion of LPB. LPB recycling is limited to a single market (Save Board) and it is estimated that this market can only take up to 50% of all LPB products from one single producer. Unless further recycling plants can be guaranteed there is a possibility that LPB products collected through the CRS could be landfilled and this would greatly reduce consumer confidence in the scheme. Save Boards recycled product sales are also limited in a niche retail market and even if they increase production there are no guarantees they could sell the products they produce. – Whakatāne District Council (20387)

A few submitters questioned whether coloured PET or PET meat trays should be collected, as coloured PET is currently not recyclable in Aotearoa New Zealand and has limited markets offshore. A few industry submitters, such as Plastics New Zealand, suggested that coloured PET be removed from the list for now, and that it could be re-introduced into the system as infrastructure improvements and/or product stewardship builds effective recycling capability.

## 15.6. Additional materials for inclusion

**Question 36:** If you think any additional materials should be included, please explain which ones and why.

Many submitters suggested several additional materials to be included in a standard set of materials for kerbside collection. The most common additional items suggested were LPB, aerosol cans, soft plastics, and lids. Further materials noted were other types of plastic, electronics, polystyrene, and food and drink packaging. Individual submitters in particular were keen to recycle as many materials as possible.

Some local government, industry association and individual submitters said that no change should be made to the list presented in the consultation document, and that only materials that can feasibly be recycled should be collected.

### **15.6.1. Liquid paperboard (LPB)**

A few submitters, mostly local government and industry associations, requested that LPB be added to the list of standard materials for collection. Submitters noted that LPB collection should be consistent with NZ CRS proposals and should therefore be included in a standard list of kerbside materials.

Aligning what is collected at kerbside with the CRS will minimise consumer confusion and lead to higher recovery rates. On this basis NZFGC believes that Liquid Paper Board should be included in both the CRS and kerbside collections. According to MFE the market for LPB has seen a 34% growth in New Zealand in the last two years. Excluding their product formats from kerbside recycling would undermine the efforts of companies to take responsibility for their packaging and discourage investment to address the growing waste issues that this proposal is aiming to resolve. – New Zealand Food and Grocery Council (20362)

A few submitters also noted that LPB containers are common contaminants in recycling collections, so there would be additional benefits to recycling them.

We understand that currently only two councils collect Liquid Paper Board ... products in their kerbside recycling. This packaging is a common contaminant seen in our kerbside recycling collection and we feel this will only increase as Liquid Paper Board ... containers are to be accepted for recycling under the Container Return Scheme. There is a high probability some of these products will end up in kerbside recycling collections; it would be worth including these as standard kerbside materials to reduce consumer confusion. Methods for separating out this type of packaging at MRFs may need further investigation. – Central Otago District Council (20130)

### **15.6.2. Aerosol cans**

A few submitters, mostly industry or businesses, requested that aerosol cans be added to the list of standard materials for collection. These submitters noted that aerosol cans are widely used in Aotearoa New Zealand. Submitters also noted that some councils and overseas jurisdictions already collect aerosol cans, and there are markets for empty cans.

The picture with aluminium aerosols recoveries is more complicated but we note that recovered aluminium aerosols are in demand for several markets, including for secondary products such as joinery, ladders, etc, and as a feedstock to other alloys and steel. – Australian Aerosol Association (20259)

### **15.6.3. Soft plastics**

Some submitters requested that soft plastics be added to the list of standard materials for collection. Submitters noted that soft plastics are a common material in Aotearoa New Zealand and a major source of litter. Some submitters noted that soft plastics infrastructure already exists due to local soft plastics drop-off points (such as in supermarkets and shopping malls), but that these drop-off points are not used widely enough.

### 15.6.4. Other plastics

Some submitters requested that all plastic types be considered for collection, as many types of plastic are commonly used in Aotearoa New Zealand. Submitters suggested these be collected to avoid confusion, reduce recycling contamination, and reduce the amount of plastic that ends up in landfills.

### 15.6.5. Lids

Some submitters said that lids – that are of the same material as the container and can be reattached – should be included for standard collection. Some submitters acknowledged that this should be consistent with the NZ CRS, and that industry producers were working to make container and lid materials more consistent. A few submitters acknowledged that metal lids could not currently be captured in kerbside recycling.

### 15.6.6. Other materials

Polystyrene and aluminium foil were the most common extra materials suggested by submitters in addition to those listed above. Submitters noted that these are common household materials. Some submitters further noted that polystyrene can now be repurposed into building materials, and that this should be considered as part of a new kerbside scheme. A few other materials were also mentioned, such as compostable items, small materials, textiles and toothpaste.

Launched in New Zealand in 2021, Colgate developed a tube which is made of HDPE 2, designed specifically to be recycled in the rigid HDPE bottle stream. Previously, all toothpaste tubes were made of multiple materials welded together in a number of layers, which meant they were not recyclable. We want to ensure the standardised material list which calls out the collection of HDPE 2 bottles, also captures HDPE Tubes.  
– Colgate-Palmolive (20076)

A few submitters requested that electronics and batteries be collected with kerbside recycling. A few submitters suggested these materials could be collected less frequently, to make a kerbside e-waste scheme more feasible.

A few submitters, including those from the cosmetics industry, noted that many small items will not meet the threshold for processing. They noted that the proposed size threshold for accepting items in Aotearoa New Zealand is inconsistent with Australia's threshold, and suggested that Aotearoa New Zealand's threshold be lowered from 50 mm.

## 15.7. Regular review of the standard set of materials

**Question 37:** Do you agree that the standard set of materials should be regularly reviewed and, provided certain conditions are met, new materials added?

Submission type	Option	Total	Per cent
Detailed	Yes	193	98%
	No	3	2%

	Total responses	196
--	-----------------	-----

Most submitters agreed that the standard set of materials should be reviewed regularly, with new materials added if certain conditions are met. Some of these submitters noted that materials should be reviewed to allow for innovation and future proofing.

The ongoing efficiency of kerbside recycling ... will in part depend on whether it can accommodate innovations in packaging types. A standardised kerbside scheme should therefore feature a mechanism to include new materials in the future. For example, plastic 4 LDPE rigid is recyclable in New Zealand, but recycling rates are currently limited by low volumes. If packaging innovation or changes to consumer preferences lead to more of this packaging material being used in the future, consideration should be given to including it in kerbside collections. – Fonterra (21446)

A few submitters also noted that reviews should allow for materials to be removed if appropriate – for instance, when an end market for that material no longer exists. Similarly, a few submitters noted that if materials are to be removed, the Ministry should consider alternative strategies, to avoid these materials ending up in landfills.

A few submitters, including Nelson City Council, agreed with the proposed review, but urged caution be taken, as reviews (and the changes that result from them) can be resource intensive. A few submitters also noted that changing the standard set of materials too frequently could lead to confusion. Council submitters suggested that a six- or seven-yearly review would be appropriate, to align with the review periods for Waste Minimisation Management Plans.

## 15.8. Considerations when determining future classes of materials

**Question 38:** What should be considered when determining whether a class of materials should be accepted at kerbside in the future?

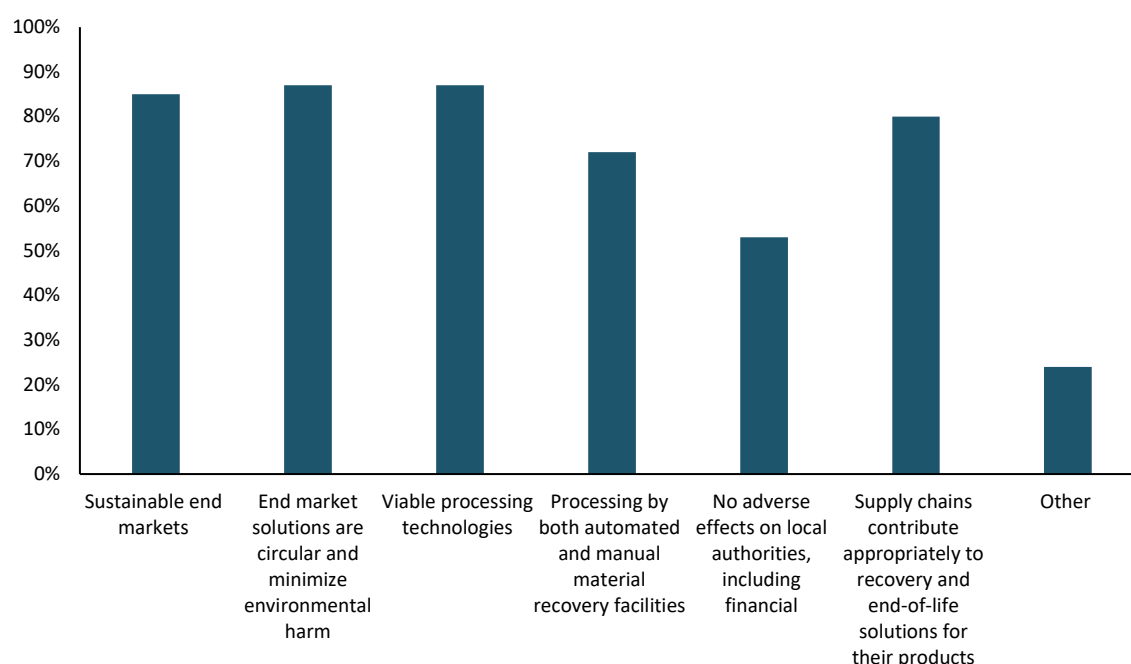
- Sustainable end markets
- End-market solutions are circular and minimise environmental harm
- Viable processing technologies
- Processing by both automated and manual material recovery facilities
- No adverse effects, including financial, on local authorities
- Supply chains contribute appropriately to recovery and end-of-life solutions for their products
- Other (please specify)

Selection	Total	Per cent
End-market solutions are circular and minimise environmental harm	167	87%
Viable processing technologies	167	87%
Sustainable end markets	164	85%
Supply chains contribute appropriately to recovery and end-of-life solutions for their products	154	80%

Processing by both automated and manual material recovery facilities	138	72%
No adverse effects, including financial, on local authorities	102	53%
Other	46	24%
<b>Total responses</b>	<b>193</b>	

Figure 8 provides submitters' responses to Question 38 as percentages across the seven response options.

**Figure 8: What should be considered when determining whether a class of materials should be accepted at kerbside in the future?**



Many submitters agreed that all listed criteria should be considered when determining what materials should be collected at kerbside. However, the top three were:

- that end-market solutions are circular and minimise environmental harm
- viable processing technologies
- sustainable end markets.

A few submitters further commented that working towards a circular economy was important and should drive materials selection. A few submitters noted that kaupapa Māori should also be considered as a criterion for materials selection.

All of these apply, but a priority consideration should be emissions associated with actions, as well as opportunities to design waste out rather than embed single use. We suggest that Kaupapa Māori (Māori values) should also be a criterion for these decisions.

– Nelson City Council (20132)

A few submitters suggested that a model should be developed where producers share responsibility for containers by shifting the cost of resource recovery to producers and consumers of beverage containers. These submitters, including the New Zealand Beverage



Council, emphasised the importance of materials manufacturers and importers taking responsibility for the lifecycle of their products in Aotearoa New Zealand.

## 15.9. Decision-maker for new materials

**Question 39:** Who should decide how new materials are added to the list?

- The responsible Minister
- Ministry for the Environment staff in consultation with a reference stakeholder group
- Existing Waste Advisory Board
- An independent board
- Other (please specify)

Selection	Total	Per cent
Ministry for the Environment staff in consultation with a reference stakeholder group	69	30%
An independent board	66	28%
Other	46	15%
Existing Waste Advisory Board	34	20%
The responsible Minister	17	7%
<b>Total responses</b>	<b>232</b>	

The most popular selection was Ministry for the Environment staff in consultation with a reference stakeholder group.

For future updates to the kerbside system, a working group involving key industry stakeholders and the MfE would work best, given that the stakeholders have more up-to-date knowledge on technological advances in packaging design and material recycling, changes occurring in other jurisdictions, etc. – Unilever (20326)

This was closely followed by an independent board:

The Council prefers an independent agency or board, with members from recycling re-processors, recycling contractors and local government as these are organisations who primarily deal with recycling after it has been packaging. In our previous submission on the New Zealand Waste Strategy and supporting legislation we strongly advocated for the establishment of an independent agency to deliver the significant changes ranging from product stewardship through to the CRS, as well as administering funding. Even with significant resourcing, leaving the implementation and operationalisation of these significant programme changes with the Ministry for the Environment seems unrealistic. This agency needs to be independent with good representation including climate change specialists, iwi, the community sector and industry representatives. – Tasman District Council (21441)

Some submitters made suggestions as to who should be included in reference stakeholder groups (eg, territorial representatives, iwi and hapū, and representation of affected businesses).

## 15.10. Network of convenient locations

**Question 40:** Do you agree that, in addition to these kerbside policies, Aotearoa New Zealand should have a network of convenient and easy places where people can recycle items that cannot easily be recycled kerbside? For example, some items are too large or too small to be collected in kerbside recycling.

Submission type	Option	Total	Per cent
Detailed	Yes	193	99%
	No	2	1%
	Total responses	195	

Most submitters agreed that, in addition to kerbside, there should be a network of convenient recycling locations. Some of these submitters noted that recycling locations should be more conveniently located than current waste-transfer and recycling stations, to maximise utility. Some submitters also noted that recycling locations should offer recycling options for any materials able to be recycled in Aotearoa New Zealand, even if they were not on the standard list of materials collected at kerbside.

A few submitters, including some councils, agreed in principle to this idea, but noted that cost and infrastructure would need to be considered before committing to a recycling network.

The costs associated with the infrastructure, collection methodology, transport and responsible end of life recycling must be covered by the brand/manufacturer/producer/retailer rather than council or community. – Tasman District Council (21441)

A few submitters also raised concerns about product stewardship and wanted to ensure that a strong stewardship policy was in place to guide recycling and waste management.

Again, the above pre-supposes that these items would fall into a waste category when with some stewardship approaches the items might never see or interact with a waste system. New Zealand needs a stewardship recovery policy approach that places equity of service provision and ease of access as a key foundation of any system. – Marlborough District Council (20071)

# 16. Proposal 2: All urban populations should have kerbside food-scrap collections

Please refer to Table 1 for quantification of submitters.

## Status quo

Food waste makes up 9 per cent of waste sent to class 1 landfills and 22 per cent of emissions generated by landfills.<sup>20</sup> Emissions from food waste in landfills can be produced for up to 50 years, even after a landfill is closed. While some of these emissions can be captured and turned into power, some gases still escape into the atmosphere. It is therefore important that we start removing food waste from landfills as quickly as possible.

Councils will probably continue to roll out kerbside food waste collections, but it is unlikely that every council will choose to do so. On the current trajectory, Aotearoa New Zealand will not achieve the proposed 2030 targets in the [New Zealand Waste Strategy](#) or the proposed 40 per cent reduction in biogenic methane in the [emissions reduction plan](#).<sup>21</sup>

## Proposed changes

The Ministry is proposing that households have access to a food-scrap collection at kerbside for urban areas (defined as a town with a population of 1,000 or more residents) and in areas where there are already existing kerbside collections.

### 16.1. Diverting food and garden waste

**Question 41:** Do you agree that food and garden waste should be diverted from landfills?

Submission type	Option	Total	Per cent
Detailed	Yes	190	97%
	No	6	3%
	Total responses	196	

Most submitters agreed that food and garden waste should be diverted from landfills. There was broad support across submitter types, including individuals, local government, business and industry organisation submitters. Submitters noted the positive environmental impact of reducing methane emissions.

<sup>20</sup> Wilson D, Eve L, Ballinger A. 2020. *Improvements to estimates of greenhouse gas emissions from landfills*. Prepared for the Ministry for the Environment by Eunomia Consulting. Wellington: Ministry for the Environment.

<sup>21</sup> If those proposed targets are adopted. The Government consulted on the proposed waste strategy and the emissions reduction plan in late 2021 and is now considering feedback from these consultations, with final policy decisions expected during 2022. *Transforming recycling*, note 1 above, p 76.

It is madness that organic materials are entering landfill. All organic material must be banned from landfills and appropriate recycling methods used. – Individual (20018)

There were a variety of potential benefits suggested by some submitters.

Diverting food and garden waste from landfill will produce environmental, economic, and social benefits locally and nationally. – TAO Forum (20376)

However, some submitters also acknowledged areas of concern with diverting food and garden waste from landfills. Concerns focused on challenges that individuals, organisations and local governments would face in implementing the proposal.

Access to suitable facilities for processing this material is a limiting factor in many parts of New Zealand. In addition to being diverted from landfill, the organics strategy, planning and management. – Hamilton City Council (20401)

Some submitters made suggestions on increasing the effectiveness of the proposal to divert food and garden waste from landfills. The most common suggestion focused on raising awareness of the need to do so, through education and marketing campaigns.

## 16.2. Weekly kerbside food scraps collection

**Question 42:** Do you agree that all councils should offer a weekly kerbside food-scrap collection to divert as many food scraps as possible from landfills?

Submission type	Option	Total	Per cent
Short form	Yes	1,179	91%
	No	116	9%
	<b>Total responses</b>	<b>1,295</b>	
Detailed	Yes	232	79%
	No	61	21%
	<b>Total responses</b>	<b>293</b>	
Combined	Yes	1,411	89%
	No	117	11%
<b>Total responses</b>		<b>1,588</b>	

Submitters expressed mixed views on councils offering weekly kerbside food-scrap collection to divert as many food scraps as possible from landfills. Most individual, business and industry association submitters agreed with the proposal. However, local government was more cautious. Most concerns from councils focused on a desire to avoid passing costs on to ratepayers. Some council submissions raised concerns about the costs of developing the necessary infrastructure, the delivery of the service, and the sources of funding for this proposal.

If we are going to achieve ambitious targets, adequate funding and subsidy needs to enable capital and operational costs to achieve them. This is because of a rates fearful environment. We have seen that while ratepayers support an expansion of local authority service to include kerbside organics, they will not always go as far to pay for the service

out of rates. For example, ratepayers voted not to increase rates for kerbside food scraps in Raglan. – South Waikato District Council (20320)

Another reason to have capital and operational costs funded or subsidised is that the targets are national, so should support equitable services across the urban, rural areas as well as in the North and South Islands. A kerbside food scraps service is also more expensive in rural areas, meaning ratepayers in these areas have a more expensive service to agree to. – Hauraki District Council (20286)

A few councils acknowledged the complexity of implementing a weekly kerbside food-scrap collection, and the need for locally specific solutions. Other issues highlighted by councils included equity of access, the differences between rural and urban communities and their specific needs, and different processing options.

We support food scraps collection; however we are unsure whether this measure should be adopted by all councils regardless of circumstance. While Auckland Council is in the midst of rolling out a food scraps collection, this was based on an analysis of the context and strong support from the public and Māori organisations. – Auckland Council (20402)

Some submitters who agreed that there was a need for weekly kerbside food-scrap collection made a range of other implementation suggestions, including a phased roll-out, location-specific inclusion criteria, and an education programme.

## 16.3. Mandatory food-scrap collections

**Question 43:** Do you agree that these collections should be mandatory in urban areas (defined as towns with a population over 1,000) and in any smaller settlements where there are existing kerbside collections?

Submission type	Option	Total	Per cent
Detailed	Yes	154	86%
	No	25	14%
	Total responses	179	

Most individual, business, and industry association submitters agreed that kerbside food-scrap collection should be mandatory in urban areas and in smaller settlements that have existing kerbside collections. Submitters said that this proposal would create a sense of equity between urban and smaller communities.

Yes – from our discussions with Christchurch central city residents, their inability to access the same urban collections as other suburbs has been a huge disadvantage. – Sustained Fun Limited EcoSplat (20097)

A few councils expressed concerns about the mandatory nature of the proposal and suggested further investigation was needed. Most councils agreed that kerbside food-scrap collection should be mandatory for urban areas. Councils suggested flexibility for rural areas due to reasons such as high costs of collection, and opportunities to encourage or support at home or existing local composting initiatives. They suggested potential solutions for rural communities including local community composting hubs, compost education, and some form of opt-in service.

Kerbside collection should go hand in hand with other options for smaller settlements; for example, home composting/community gardening. It should not negatively affect existing decentralised or local composting initiatives and community gardens with training and raising awareness. Maintaining local food waste initiatives is a more sustainable option as opposed to reliance on a centralised composting service where kerbside collection is not logistically feasible. The geographic distance of smaller settlements will invariably incur greater costs in disposal. Councils will need to consider the best approaches for their district managing kerbside collections from smaller towns looking at the proximity of other towns, geographic constraints and benefits/costs of running smaller green waste facilities.

– Sustained Fun Limited EcoSplat (20097)

## 16.4. Council role in household garden waste diversion

**Question 44:** Do you think councils should play a role in increasing the diversion of household garden waste from landfills?

Submission type	Option	Total	Per cent
Detailed	Yes	179	83%
	No	37	17%
	<b>Total responses</b>	<b>216</b>	

If so, what are the most effective ways for councils to divert garden waste?

- Offering a subsidised user-pays green-waste bin
- Making it more affordable for people to drop off green waste at transfer stations
- Promoting low-waste gardens (eg, promoting evergreen trees over deciduous)
- Other (please specify)

Selection	Total	Per cent
Making it more affordable for people to drop off green waste at transfer stations	100	57%
Promoting low-waste gardens (eg, promoting evergreen trees over deciduous)	93	53%
Offering a subsidised user-pays green-waste bin	89	51%
Other	40	23%
<b>Total responses</b>	<b>174</b>	

Most submitters, including most councils, agreed that councils should play some role in increasing the diversion of household garden waste from landfills.

Yes, we agree that local government should have a role in increasing the diversion of household garden waste from landfills. – Tasman District Council (21441)

We agree with the Zero Waste Network that this should be considered where it suits the needs and aspirations of a community. We recommend that garden waste collections are optional but should be subsidised. Councils should also focus on providing convenient drop-off locations at a network of resource recovery centres. – Āmiomio Aotearoa (20203)

There were mixed views on the specific role that councils should play. Most individual submitters suggested a subsidised user-pays green-waste bin, increasing the affordability of green-waste disposal at transfer stations, and promoting low-waste gardens. However, council submitters sought information on how the proposal would be funded and were concerned that any form of subsidised user-pays green-waste diversion would result in raising rates.

We support Central government to run education around methane emissions, green-waste contamination (from physical and chemical sources) and the best methods to divert organics from landfill/incineration/pyrolysis. We are uncertain as to where [the] subsidy could come from, but we cannot fund an additional service. In our regions, we have found that [the] community already is willing to transport the material as well as pay for disposal. There are already companies set up to collect material and we do not see the point in being in competition. That being said, we support that councils should have the option to run FOGO. As part of standardising kerbside, we support banning 240 L wheelie bins as this increases garden waste disposal to landfill. The most effective way for local government to achieve diversion is for MfE to offer analysis on this best practice, otherwise each council has to fund and resource decision making.

– Hauraki District Council (20286)

## 16.5. Phased approach to kerbside food-scrap collections

**Question 45:** We propose a phased approach to the roll-out of kerbside food-scrap collections. The timeframes will depend on whether new processing facilities are needed. Do you agree with a phased approach?

Submission type	Option	Total	Per cent
Detailed	Yes	154	86%
	No	25	14%
	<b>Total responses</b>	<b>179</b>	

Most submitters agreed with a phased approach to the roll-out of kerbside food-scrap collection. These submitters noted that a phased approach will allow time for markets and the appropriate infrastructure to develop, noting the need to balance urgency and the need to get it right.

Most councils also agreed that a phased approach would be appropriate. One council disagreed, due to the region already having a food-scrap collection.

However, there were mixed views on the timeframes for the proposal across submitter types. Some submitters suggested the roll-out was urgent and needs to happen faster than suggested. However, some submitters, including most councils, considered the current suggested timeframe was not long enough, given the complexity for local and central government in developing kerbside food-scrap collections. Some councils raised concerns about what would be required to successfully implement kerbside food-scrap collections (eg, resourcing).

Yes, a phased approach is appropriate, but the timeline proposed does not allow council to accomplish this. Some councils will not have adequate staff resources, etc, to achieve a 2025 timeframe. In addition to proximity to processing facilities, impacts that need to be considered include communications, budget (LTP), job descriptions, customer service,

logistics, trucks/bins, databases, and contracts to start. Working backwards in time, only councils who are already in the process of implementing this will be able to do this by 2025. – South Waikato District Council (20320)

Many submitters were keen to see a focus on developing the necessary infrastructure and facilities. Some submitters suggested a scaled approach to developing capacity, such as starting with smaller or community-focused processing facilities, including social enterprises and community organisations, as opposed to larger regional infrastructure.

## 16.6. Councils with access to suitable existing infrastructure begin food-scrap collections from 2025

**Question 46:** Do you agree that councils with access to suitable existing infrastructure should have until 2025 to deliver food-scrap collections?

Submission type	Option	Total	Per cent
Detailed	Yes, that's enough time	93	53%
	No, that's not enough time	15	9%
	No, it should be sooner	67	38%
	<b>Total responses</b>	<b>175</b>	

Most individual, business, industry association and DHB submitters agreed that councils with access to suitable existing infrastructure should have until 2025 to deliver food-scrap collections. These submitters noted that if the necessary infrastructure was already in place, three years would be sufficient for councils to plan and implement the scheme.

Yes, that is enough time. If the facilities are available, they should be being used.  
– BioRich (20331)

Yes. If funding support and guidance is provided by the Government, then 2025 may provide sufficient time for some councils with access to existing facilities to establish a food scraps collection. Councils would need to undertake the detailed financial planning and procurement in 2023 to be able to consult with their community in their Ten-Year Plan process. – TAO Forum (20376)

Some submitters, including individual, business and industry organisations, sought a shorter timeframe, noting the importance of the proposal. One primary sector industry body commented that reducing methane emissions is a key priority in the primary industry and it is essential that there is a similar level of drive to remove emissions from urban landfills.

Local government submitters had mixed views. Some council submitters agreed that councils with access to suitable existing infrastructure should have until 2025 to deliver food-scrap collections. Others said that a 2025 deadline does not provide enough time for councils to prepare to successfully implement the proposal.

We agree that deadlines need to be put in place to make these changes happen, however we feel that the 2025 deadline may not be achievable. Firstly, the outcome from this consultation needs to be finalised and it is unclear when this will be. Councils will then need to undertake a number of changes including: costs analysis, changes to LTPs and



Annual Plans, budgets, fees and charges, variation to contracts, building of specialist collection trucks, procurement (in what will be a very competitive market with many councils taking part), asset changes and purchase, education, communications, etc. Even with access to a processing option we believe 2027 is a more realistic deadline.  
– Whakatāne District Council (20387)

## 16.7. Councils without access to suitable existing infrastructure begin food scrap collection in 2030

**Question 47:** Do you agree that councils without existing infrastructure should have until 2030 to deliver food-scrap collections?

Submission type	Option	Total	Per cent
Detailed	Yes, that's enough time	65	38%
	No, that's not enough time	6	4%
	No, it should be sooner	99	58%
	<b>Total responses</b>	<b>170</b>	

Most individual, business and industry association submitters did not agree, and suggested that the 2030 timeline should be brought forward.

No; we think this target should be brought forward and councils without suitable infrastructure should be provided with support to help reach their waste emissions reduction obligations. – Waste and Circular Economy Engineering Staff at Beca Ltd (20173)

Policy should not be based on the availability of existing infrastructure but provide incentives to have appropriate infrastructure available as quick as possible. Ideally it should be sooner; because consultation and communities take time this may have to be a goal rather than a requirement. To speed up the process will require [assistance to] council and investors to decide [and/or] install proper infrastructure. – Bioenergy Association (20390)

Some submitters, including local government submitters, agreed that councils without existing infrastructure should have until 2030 to deliver food-scrap collections. Business, industry association and local government submitters acknowledged the complexity of the challenges facing councils and noted that a 2030 timeline would enable councils to design and implement food-scrap collections, and would result in the best outcomes.

However, a few local government submitters raised concerns that the 2030 timeframe was too short.

No, that's not enough time. Funding, regulation, and appropriate processing infrastructure will take some time to work through and [councils] without this infrastructure currently may have issues with the consenting process of new facilities. – Palmerston North City Council (20365)

## 16.8. Additional facilities with current capacity and resource consent

**Question 48:** Are there any facilities, in addition to those listed below, that have current capacity and resource consent to take household food scraps?

- Envirofert – Tuakau
- Envirowaste Hampton Downs – Waikato
- MyNoke Vermicomposting site – Taupō
- EnviroNZ – a new facility planned for the Bay of Plenty in 2023
- Living Earth – Christchurch
- Timaru Eco-composting Facility – Timaru

Submitters suggested several facilities that may have current capacity and resource consent to take household food scraps. Community-scale sites included:

- Community Compost – Nelson
- Xtreme Zero Waste – Raglan
- Kaicycle – Wellington
- EcoSolutions Compost Connection – national
- City to Farm – Auckland
- Kaipātiki Project – Auckland

Larger sites included:

- Ecogas Organics Processing Facility – Reporoa
- BioRich Ltd – Napier and Hastings
- Pines Resource Recovery Park – Selwyn

However, some submitters acknowledged that the list provided in the proposal captured most of the large-capacity facilities that could take household food scraps. A few submitters raised concerns with the scope of the provided list, suggesting that the list had a bias towards large-scale facilities and that the Government should consider a decentralised approach.

The list that is provided here overlooks a number of smaller operators who are currently taking household food scraps and are consented to do so. As such, the list sends the message that only large processing facilities are viable or worth considering. We urge the government to consider multiple systems and a decentralised network approach. This can operate in tandem with larger operators. There is plenty of organic waste in New Zealand to go around, but all need to be acknowledged, recognised and supported to create a diverse system that is flexible, resilient, locally relevant and achieves multiple outcomes beyond diversion. – Āmiomio Aotearoa (20203)

## 16.9. Additional materials excluded from kerbside food and garden bins

**Question 49:** Are there any additional materials that should be excluded from kerbside food and garden bins? Please explain which ones and why.

Some submitters suggested a variety of additional materials that should be excluded from kerbside food and garden bins, including:

- green waste
- animal waste
- liquid waste
- vacuum cleaner dust
- ash, treated timber, sawdust and rubble.

Most of these additional exclusions were proposed due to health and safety concerns.

We propose that ash, timber and sawdust are prohibited, in order to reduce arsenic contamination of compost products. This has been found to be a serious issue in both Christchurch and Timaru composting operations and is managed through seasonal advertising. – Canterbury Mayoral Forum (20268)

However, some submitters questioned why certain materials would be excluded from kerbside food and garden bins. A few submitters noted that there is a need for kerbside food and garden bins to be as all-encompassing as possible, to reduce the likelihood of confusing consumers and reducing buy-in.

Conversely, a few other submitters felt that the messaging should be as simple as possible to reduce contamination.

Supporting this view, some submitters suggested a standard list of acceptable materials to ensure a kerbside food and garden bin scheme was effective.

Standardisation of food scraps need to occur across the country to avoid contamination and confusion ... We want a specific set of things to be accepted at the kerbside.  
– Hauraki District Council (20286)

## 16.10. Considerations for non-food products or packaging to be accepted

**Question 50:** For non-food products or packaging to be accepted in a food-scrap bin or a food-and-garden-waste bin, what should be taken into consideration?

- Products help divert food waste from landfills.
- Products meet Aotearoa New Zealand standards for compostability.
- Products are certified in their final form to ensure they do not pose a risk to soil or human health.
- Products are clearly labelled so that they can be distinguished from non-compostable products.

- A technology or process is available to easily identify and sort compostable from non-compostable products.
- Producers and users of the products and packaging contribute to the cost of collecting and processing.

Selection	Total	Per cent
Products help divert food waste from landfills	128	81%
Products meet Aotearoa New Zealand standards for compostability	147	92%
Products are certified in their final form to ensure they do not pose a risk to soil or human health	139	87%
Products are clearly labelled so that they can be distinguished from non-compostable products	144	91%
A technology or process is available to easily identify and sort compostable from non-compostable products	114	72%
Producers and users of the products and packaging contribute to the cost of collecting and processing	114	72%
<b>Total responses</b>	<b>159</b>	

Most submitters agreed that all of these factors should be considered. The three priority considerations were that:

- products meet Aotearoa New Zealand standards for compostability
- products are clearly labelled so that they can be distinguished from non-compostable products
- products are certified in their final form to ensure they do not pose a risk to soil or human health.

A few submitters stated that there is a need for further work to develop a composting standard for Aotearoa New Zealand.

As far as we are aware there is no New Zealand Standard for compostability, and this leads to problems with compostable products especially in misleading labelling. There are number of overseas standards (such as AS4454) and these are complex. – Whakatāne District Council (20387)

## 16.11. Materials included in kerbside food and garden bins

**Question 51:** If you think any of the materials listed should be included in kerbside food and garden bins, please explain which ones and why.

- Kitchen paper towels/hand towels/serviettes
- Newspaper and shredded paper
- Food-soiled cardboard containers (eg, pizza boxes)
- Cardboard and egg cartons
- Compostable plastic products and packaging

- Compostable fibre products and packaging
- Compostable bin liners
- Tea bags

There were mixed views on whether any of the listed materials should be included in kerbside food and garden bins. Some submitters suggested that the materials listed should be excluded from kerbside food and garden bins.

No. Clear, consistent, and simple messages work most effectively to change behaviour. The message of food scraps and garden scraps in this bin is clear. To include other items will be less effective and likely lead to higher contamination levels. – WasteMINZ Behaviour Change Sector Group (20144)

Some submitters said that it would be confusing if non-food materials were included in kerbside food and garden bins.

Taking non-food products will lead to confusion and contamination of the compost product unless there are some very clear and consistent guidelines and advertising for manufacturers, importers, retailers and households. – Whangārei District Council (20139)

However, a few submitters indicated that some of the listed materials should be included. The most common items suggested by submitters to include in kerbside food and garden bins were compostable plastic products and packaging, kitchen paper towels/hand towels/serviettes, and newspaper and shredded paper.

Those who wanted fibre products included noted concerns over the presence of PFAS in fibre products and wanted these phased out to enable fibre products to be safely processed.

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

Please refer to Table 1 for quantification of submitters.

## Status quo

Most councils do not know how well households in their regions are recycling. In many districts, the private sector also provides collections for dry recyclables (13 districts) and/or rubbish services (48 districts). Collections by private providers are sometimes provided instead of council services, and other times as a supplement to them.

Many private providers of household kerbside collections do not share their data with councils. This means councils do not know how well households are recycling and whether efforts to encourage people to reduce their waste are effective. It also makes it difficult for local and central government to plan future services and activities.

## Proposed changes

The Ministry is proposing that private companies report annually, directly to central government, on the performance of their private household kerbside collections. The Ministry would then combine this data with additional information from councils on their kerbside collections. The overall performance for each region, combining council and private collections, would then be published online.

### 17.1. Understanding how well kerbside collections are working

**Question 52:** Do you agree that it is important to understand how well kerbside collections are working?

Submission type	Option	Total	Per cent
Detailed	Yes	200	100%
	No	1	0%
	Total responses	201	

All submitters except one, including recyclers, agreed that it is important to understand how well kerbside collections are working. Many agreed reporting would be an effective tool to determine if objectives were being met and resources were being used efficiently. These submitters said that the data on kerbside collections would help to:

- achieve outcomes in reducing emissions and reducing waste
- inform change

- improve transparency
- support decision-making
- support community recycling practices
- help to hold collectors and the public accountable.

Data collection and reporting is crucial to ensure kerbside collections are achieving the overall goal to divert maximum waste from landfill and reduce greenhouse gas emissions. Transparency on the performance of different regions may encourage improvements in community recycling practice. – Sanitarium Health Food Company (20316)

A better understanding of the district waste production and recovery will allow Councils to plan better for future waste minimisation and management work – Dunedin City Council (20079)

A few submitters focused on the need for data collection beyond what was proposed in the consultation document, to better understand waste generated nationally, including imported goods, and material flows between regions.

All councils agreed it is important to understand how well kerbside collections are working, including to encourage performance and higher standards. Councils made a range of additional suggestions including:

- ensuring wider data collection at scale
- including waste and materials recovered from private drop-off points
- monitoring and reporting by authority or region
- measuring activity and impact across all levels of the waste hierarchy so that progress at the top of the hierarchy can be monitored
- communicating results widely.

## 17.2. Private sector reporting on private household kerbside collections

**Question 53:** Do you agree with the proposal that the private sector should also report on their household kerbside collections so that the overall performance of kerbside services in the region can be understood?

The proposal is that private companies report annually, and directly to central government, on the performance of their private household kerbside collections. The overall performance for each region, combining council and private collections, would then be published online.<sup>22</sup>

Submission type	Option	Total	Per cent
Detailed	Yes	184	96%
	No	8	4%
	<b>Total responses</b>	<b>192</b>	

<sup>22</sup> *Transforming recycling*, note 1 above, p 84.

Most submitters agreed with the proposal that the private sector should be reporting on their household kerbside collections. These submitters commented that data on how well households are recycling will enable better reporting, improvements and decision-making. Some submitters agreed that reporting would improve transparency, enable private sector responsibility, and demonstrate progress across both the public and private sector.

This will enable MfE to continue with the strategic and regulatory functions required for achieving the new waste strategy and implement the new legislation. As part of this data collection and reporting, guidance to private contractors should be developed to ensure that their reporting is consistent with reporting from other waste stakeholders. This will ensure that this data feeds into a comprehensive nationwide system for tracking waste and diverted materials. – Dunedin City Council (20379)

A few submitters did not agree with the proposal. A few disagreed with participating in the reporting on a regional basis.

A few submitters expressed concern about a potential risk of reporting duplication in some areas, such as transfer stations, where private sector organisations have contracts with councils to deliver household kerbside collections.<sup>23</sup>

It is noted that private waste and recycling will already be reported on by local Councils running transfer stations it is received through, so there is a potential risk of duplication. – Hurunui District Council (20290)

A few submitters wanted to see reporting on commercial or business waste as well. These submitters wanted larger companies to be included but noted that reporting may be burdensome for smaller businesses.

## 17.3. Publishing information for transparency

**Question 54:** Do you agree that the information should be published for transparency?

The proposal is that summarised data will be published online in the form of total diversion rates and percentage of contamination for each region, as these measurements indicate quantity and quality, respectively.

Submission type	Option	Total	Per cent
Detailed	Yes	188	96%
	No	7	4%
	Total responses	195	

Most submitters agreed with the proposal, as it would help to provide transparency, enabling the public, the government and the private sector to understand the scale and impact of the waste being generated and the impacts of proposed changes.

We support publication of transparent data; however, it must be validated. At this stage it would be more appropriate for the information to be collated by a government agency

---

<sup>23</sup> Recycling and rubbish collected through transfer stations is not proposed to be included in council reporting, so there is no risk of duplication.



such as MfE and released annually online in report format. – Glass Packaging Forum (20336)

All councils agreed to the proposal, citing that it would enable a better understanding of regional performance, inform planning, and strengthen the accountability of operators. A few councils noted that, as they have existing contracts with collectors, some data may be duplicated. There may also be challenges in reporting when some collectors work across boundaries, and reporting may not be accurate until weighing technology on trucks is developed and implemented. Some were concerned more about how and when the baseline would be measured. A few councils expressed concerns that if private and council results were combined, it may result in targets not being met.

A few submitters did not agree with the proposal. Some were concerned about the commercial sensitivity of data when reporting on a regional basis and wanted to keep this commercial data private (ie, not published online).

While we understand the intent behind this, and agree that improved data is important, we do not agree with doing this on a regional basis. In many regions a single waste management company carries out much of the collection activity. Any reporting on a regional basis could result in a breach of commercial privacy for that specific company. Any collection and reporting would need to be based on an aggregated model. – Plastics New Zealand Inc (21425)

A few submitters agreed with publishing information online but wanted further clarification of what would be reported on and measured. Some submitters suggested that the published information be aggregated (eg, by territorial authority area, region and collection type) so it does not compromise commercial sensitivity.

So long as any information published is aggregated to protect commercial sensitivities. Councils can take appropriate action based on the localised confidential information the private sector will provide. – EnviroNZ (20280)

Other suggestions included agreeing definitions of targets with individual councils, establishing a central repository for councils and private waste providers to enter data for national reporting/statistics, and developing a standard method for measuring contamination. A few individual submitters suggested information should be published in places where it would be accessible to the general public, as this could help promote behaviour change.

## 17.4. Private sector reporting on private household kerbside collections

**Question 55:** Apart from diversion and contamination rates, should any other information be published online?

Submission type	Option	Total	Per cent
Detailed	Yes	107	80%
	No	27	20%
	<b>Total responses</b>	<b>134</b>	

Most submitters suggested that other information should be published online and provided a range of ideas for other information that should be included.

Many submitters wanted to see information about other performance indicators, such as carbon footprint, contamination levels, and information about where materials are processed and what they are used for after processing.

Other suggestions were to publish information (at a regional level, such as in regional newspapers or on websites) including:

- household participation
- individual materials collected (eg, glass)
- type of collection (eg, refuse, food scraps, green waste)
- total weight of waste vs material recovered
- destination and end use of diverted materials.

Some submitters suggested publishing information to help the public to recycle, including:

- recycling processes
- rubbish rating (a record of a household's performance – ie, when they put out contaminated rubbish)
- details about what is contaminating rubbish and strategies to minimise contamination
- how to divert compostable waste.

#### **17.4.1. Views of local government**

Local government submitters provided a range of suggestions for publishing information online, including:

- quantities of materials collected, including total waste versus material recovered
- kilograms of waste per person tracked over time
- type of collection (general refuse, dry recycling, food scraps, green waste, and other materials)
- the source of the material and, where possible, the general type of material collected
- material recovery facilities, organic processing facilities, landfills, classes of landfills available within a district
- destination of materials for processing
- information on waste that travels across regional boundaries
- location of processing facilities (onshore or offshore)
- what recycled materials are being used for
- participation rate (number of properties using the service over the number of eligible properties)
- how much material that should be in the service is still in the rubbish (lost capture).

# 18. Proposal 4: Setting targets/performance standards for councils

Please refer to Table 1 for quantification of submitters.

## Proposed changes

The Ministry is proposing a minimum performance standard of 50 per cent for diversion (ie, the percentage of dry recyclables and food scraps collected for recycling from household kerbside collections).

The Ministry is also proposing a high-performance target of 70 per cent diversion to incentivise councils that are already performing well to reach and exceed international best practice. The difference between a minimum standard and a target is that not reaching a minimum performance standard over time would have consequences, whereas progress towards the high-performance target would only be monitored.

## 18.1. Minimum diversion rates for kerbside recycling services

**Question 56:** Should kerbside recycling services have to achieve a minimum performance standard (eg, collect at least a specified percentage of recyclable materials in the household waste stream)?

Submission type	Option	Total	Per cent
Detailed	Yes	162	88%
	No	23	12%
	<b>Total responses</b>	<b>185</b>	

Most submitters agreed with using minimum diversion rates to measure performance.

Yes. There should be minimum performance standards that are accompanied by central government investment and technical support as well as mandatory reporting. Performance standards are a way of encouraging improvements to the overall system which will result in less material going to landfills reducing overall emissions. – Bay of Plenty District Health Board<sup>24</sup> (20262)

Actual outcomes, recycling or otherwise must also be measured, as this will give us a clearer view of the quality of material collected and how much is lost to contamination and processing constraints. – Glass Packaging Forum (20336)

<sup>24</sup> See note 7, referencing the fact that DHBs have been disestablished, so this submission does not necessarily reflect the views of Te Whatu Ora, the successor organisation.

A few submitters who agreed that there should be performance standards disagreed with diversion rates as the measure, or expressed concerns about achieving these rates. A few submitters disagreed with the proposal but did not explain why. A few submitters were concerned about the costs of collecting the data.

In principle we support reporting and minimum standards; however it needs to be acknowledged that smaller rural Councils are probably not resourced sufficiently to undertake regular reporting. – Hastings District Council (20351)

A few submitters noted that diversion rates should not be the only measure used to understand the efficiency of the scheme. Alternative measures suggested included:

- total waste per capita
- total material recovered for reuse
- material-specific targets
- contamination rates
- carbon emissions associated with collection and processing.

Instead of overall diversion targets being set, materials specific targets could be an option, for example a target for a 75% reduction of food waste from general waste stream, and a 75% reduction of materials able to be recycled kerbside. – Porirua City Council (20107)

A few submitters considered that the diversion rate should reflect both the rate of collection and the recycling of materials, as isolated metrics do not provide the full picture of how successfully a kerbside recycling scheme is performing.

Performance measurement should relate to an understanding of a system rather than an isolated metric. If the kerbside recycling collection system is generating a contaminated product that cannot be subsequently sorted to an end-market requirement, then the collection methodology needs to change. Perhaps any performance measurement should therefore focus on the mitigation of contamination, for example, by discontinuing co-mingled collections. How is it possible to quantify a specified percentage of recyclable materials in a household waste stream? – Marlborough District Council (20071).

A few submitters noted that the same expectations should be placed on private and public organisations. A few submitters considered that measuring diversion rates was unlikely to influence behaviour and may not reflect or create actual environmental benefit. It was noted by a few submitters that the focus should be shifted to reducing consumption rather than diverting existing rates of consumption.

Councils can provide the standardised kerbside service and encourage use through education and behaviour campaigns, but QLDC does not believe the proposed performance standard supports activity at the top of the waste hierarchy, ie, reduction in consumption of goods. Focusing on just recycling and landfill data from household kerbside collections does not encourage activity at the top of the hierarchy. – Queenstown Lakes District Council (20368)

Diversion from landfill is a waste output, not a waste outcome, and therefore must not be treated as a waste sector policy objective in and of itself. Redirecting waste from managed landfills to other destinations is no guarantee of improved waste or environmental outcomes; often the result is the opposite ... we would argue that council

performance targets should be based on more meaningful waste minimisation metrics... – Waste Management Industry Forum (20328)

Many councils agreed with the minimum diversion rate. However, some councils also suggested other measures for reporting performance:

The Council recommends that targets would be better set by Councils and agreed with MFE based upon impacting factors, eg, ability to fund, ability to locate markets for products collected, level at which starting from, etc. – Hurunui District Council (20290)

The Forum agrees that a 50 per cent target was a good start but we encourage the Government to consider that maximum allowable recyclables in residual waste of 10 per cent could be a more appropriate target. Quality targets of a maximum 10 per cent contamination is the current industry standard for kerbside recycling. – Canterbury Mayoral Forum (20268)

They suggested that the targets be phased in over time, as well as suggesting mandatory reporting, a mechanism for funding councils, and further central government investment and technical support.

## 18.2. Minimum diversion rate of 50 per cent for dry recyclables and food scraps

**Question 57:** Should the minimum diversion rate be set at 50 per cent for the diversion of dry recyclables and food scraps?

Submission type	Option	Total	Per cent
Detailed	Yes	81	68%
	No	39	33%
	Total responses	120	

Many submitters were in favour of the diversion rate of 50 per cent. Some submitters did not agree with the suggested rate, with some submitters explaining they considered it was too high or too low, or were unsure.

We would like to see the minimum standard to be set higher at 60%. It should have a threshold below which it is no longer seen to be effective (cost of scheme, transport emissions, etc, is not worth the quantity that is collected)... – Nelson Marlborough Health (21452)

A staged approach is preferable. In this staged approach, a high performing system would be 35–40% to start, with a goal of 45% diversion minimum with green waste. Initially, a target could be set based on how councils are currently performing and what opportunity exists. – Waikato Regional Council (20380)

Some submitters noted that 50 per cent was a good starting point, and that the government should incentivise continued resourcing to encourage reaching higher levels of diversion over time. However, some councils expressed concern for a blanket target for all councils. Some suggested that a phased approach should be taken, with targets set based on current performance to ensure targets are achievable.

We do not support a blanket minimum target in the absence of a good understanding of what is achievable for a particular area. We note that a range of factors can affect household behaviours in reducing waste, such as socio-economic demographics and local attitudes to recycling, as well as housing typologies, which will vary within and between regions. – Auckland Council (20402)

A few submitters expressed concerns with how the percentage had been calculated. A few submitters noted that this rate did not consider households that manage their waste at home, especially those who compost their food waste. It was also noted that there could be unintended consequences due to the implementation of a NZ CRS, so changes such as these should be considered when setting targets.

PNCC is unclear on how you would measure materials diverted at home, for example. How can we set a performance standard when we don't currently have all the data to set the baseline? We consider that 50% is very ambitious, and question on what basis this number has been put forward by MfE. We are concerned that setting arbitrary targets could drive unexpected behaviours. – Palmerston North City Council (20365)

## 18.3. Achieving minimum diversion rate by 2030

**Question 58:** We propose that territorial authorities have until 2030 to achieve the minimum diversion rate, at which time the rate will be reviewed. Do you agree?

Submission type	Option	Total	Per cent
Detailed	Yes	81	52%
	No	74	48%
	<b>Total responses</b>	<b>155</b>	

Many submitters agreed with the proposed timeframe. Some submitters disagreed, explaining that the timeframe should be much shorter. One business submitter stated that it did not understand why Territorial Authorities have a slower timeframe than industry.

However, many local government submitters opposed the suggested timeframe and explained that they required more time to set up incremental targets and enforcement strategies and conduct further stakeholder consultation. Some of these submitters said they needed until 2030 to roll out their food-scrap collection service.

It is proposed (Questions 46 and 47) that councils have until 2025 or 2030 (depending on access to infrastructure) to deliver a food scraps service. It is unrealistic therefore to expect a minimum target can be reached for all councils by 2030 when some may have only just implemented a new service. – Auckland Council (20402)

A few submitters suggested a phased approach depending on the capabilities and infrastructure of each individual council. A few submitters suggested that those with existing infrastructure should be required to meet the minimum diversion rate earlier. A few submitters suggested aligning implementation with the NZ CRS and Plastic Priority Product Scheme.

Nationally, Councils are all at different stages of offering improved kerbside recycling. Therefore, a two-staged approach is recommended where those with the infrastructure in place have 3 years to meet the minimum standard of 60% and then 5 years to achieve

80%. For those Councils who do not have the infrastructure in place, we should be aiming to meet the minimum threshold in the first 3 years of an established collection (setting a specific year will disadvantage areas such as Wellington/Lower Hutt who do not have the capacity for commercial composting of all food waste and require development in this area before they can roll it out to public). – Nelson Marlborough Health (21452)

## 18.4. High-performance target for overall collection performance

**Question 59:** In addition to minimum standards, should a high-performance target be set for overall collection performance, to encourage territorial authorities to achieve international best practice?

Submission type	Option	Total	Per cent
Detailed	Yes	157	91%
	No	15	9%
	Total responses	172	

Most submitters supported the proposal to set high-performance targets, or supported the proposal while caveating their response. A few submitters did not agree with the proposal.

A few submitters who supported the proposal said that, by setting a target, territorial authorities would be encouraged to achieve best practice and work to achieve high levels of performance throughout the process.

A sufficiently high minimum standard will be the best way to encourage territorial authorities to achieve best practice. – Lion New Zealand Ltd (20394)

A few councils noted that high-performance targets based on performance at the top of the waste hierarchy should be considered instead.

High performance targets placed at the top of the hierarchy are supported. – Queenstown Lakes District Council (20368) and TAO Forum (20376)

Some local government submitters said that the focus should be shifted to supporting councils who have lower standards of performance, less developed infrastructure or who face challenges due to the geographic nature of their region.

It will be challenging for many councils to meet the 2030 target and the focus should be on supporting everyone to achieve this before targets are reviewed and increased, if appropriate, consistently across the board. – Tasman District Council (21441)

Some submitters noted that councils might require support to roll out the service, to ensure their practices are conducive to high performance, and to measure their performance. A few suggested that this support be provided by central government. A few submitters noted that setting targets may increase the gap in quality of services provided by large and small territorial authorities.

CODC would support the setting of high-performance targets to encourage continued improvement in waste minimisation across the country, as long as this doesn't increase

the gap in services provided by large and small territorial authorities. – Central Otago District Council (20130)

A key concern for some submitters was that councils were unclear on what best practice might look like and how the target might be measured. Some councils suggested that relevant stakeholders define and agree on best practice. A few submitters noted that the target should be reviewed over time.

## 18.5. Aspiring to a 70 per cent target

**Question 60:** Some overseas jurisdictions aim for diversion rates of 70 per cent. Should Aotearoa New Zealand aspire to achieve a 70 per cent target?

Submission type	Option	Total	Per cent
Detailed	Yes	139	87%
	No	20	13%
	Total responses	159	

Most submitters were in favour of the 70 per cent target.

An aspirational goal should be as close to 100% as possible – 70% is quite realistic.  
– Individual (20024)

However, many individuals and submitters from businesses and organisations said that a higher target should be considered, with many suggesting 80 per cent or higher. One submitter noted that other jurisdictions do much better than New Zealand because intensive regulations are in place and penalties are applied to those that are non-compliant.

Some submitters noted concerns regarding smaller councils and their ability to reach the target. With the differences in capabilities and infrastructure, submitters agreed with a staged and phased approach to implementation. Some councils agreed that the 70 per cent target was reasonable, while most other councils stated that they needed further support and evidence, so a lower target should be set. The main concern cited by some local government submitters, regardless of their position on the proposal, was that significant investment would be required for reuse systems.

Hamilton City Council supports ambitious targets with clear timeframes and pathways for all sectors to participate in achieving them. However, significant investment needs to go into reuse systems (such as for nappies to reusable nappies) for the remaining, often challenging parts in the waste stream. – Hamilton City Council (20401)

A few submitters suggested it would be difficult to measure performance against other countries who have different levels of technology, values and infrastructure compared to those in Aotearoa New Zealand. Some submitters commented on the need for further research into international best practice, such as what policy settings, infrastructure, funding, and service delivery is required, to investigate whether the Aotearoa New Zealand context is similar enough to achieve similar goals.



## 18.6. Consequences for not meeting minimum performance standards

**Question 61:** What should the consequences be for territorial authorities that do not meet minimum performance standards?

Many submitters proposed that further support should be provided to councils that do not meet the minimum-performance standards. Some submitters said that fines should be used, while a few suggested withholding levies.

Financial penalties and withholding levy payments were seen by a few submitters to be effective ways of ensuring compliance and a way to limit councils avoiding accountability for performance gaps. However, a number of councils cited concerns with financial penalties, especially for under-resourced councils, as this could create a negative feedback loop. Rather, capacity building, investment, advice, and effective service design were suggested to promote better outcomes.

Withholding levy payments or paying a fine might erode the very funding the authority needs to lift their game and improve their performance. I'd rather see them taking part in a mandatory training and education process that helps them achieve their goal.  
– Individual (20027)

We see the response of implementing a fine or withholding [levy] as counterproductive to achieve these goals. Not all territorial authorities have the same access to resources and that is why we request central government take responsibility and provide support and funding to create equity amongst the territorial authorities. – Nonstop Solutions (20103)

It was noted by a few submitters, however, that financial penalties should be used in situations of wilful negligence. A few submitters noted that closer monitoring and public reporting could be effective tools for encouraging councils to understand why a target or performance standard was not reached, and to improve. These submitters emphasised that this would enable informed investment in areas which are underperforming.

Closer monitoring of MfE/WMF funding. To remove funding would hinder the [territorial authority's] ability to improve the performance. So MfE should more closely monitor the investment decisions of low performers. – EnviroNZ (20280)

# 19. Proposal 5: Separate collection of glass and paper/cardboard

Please refer to Table 1 for quantification of submitters.

## Status quo

Currently, 39 councils in Aotearoa New Zealand collect glass separately at kerbside, and a further nine collect glass in a comingled crate but hand-sort it at kerbside. Glass can be collected in a crate or wheeled bin. Councils can also choose whether to colour-sort glass.

## Proposed changes

The Ministry is considering the following three options (besides the status quo) to reduce the impact of glass fines and shards on the quality of recycling.

1. *Issuing best practice guidance and funding.* The Government could issue guidance to councils on whether to separate glass and paper/cardboard and provide funding for new collection containers.
2. *Mandatory separation.* Councils could be required to separate paper/cardboard or glass from other recyclables, but each council could choose which material to separate.
3. *Glass collected separately.* Councils could be required to collect glass separately from other recycling.

## 19.1. Separate collection of glass or paper/cardboard at kerbside

**Question 62:** Should either glass or paper/cardboard be collected separately at kerbside in order to improve the quality of these materials and increase the amount recycled?

- Glass separate
- Paper/cardboard separate
- Separated, but councils choose which one to separate
- Status quo – they remain comingled for some councils

Selection	Total	Per cent
Glass separate	109	54%
Separated, but councils choose which one to separate	40	20%
Paper/cardboard separate	33	16%
Status quo – they remain comingled for some councils	21	10%
<b>Total responses</b>	<b>203</b>	

Overall, most submitters agreed with separating glass from paper/cardboard, noting that it was necessary and best practice to separate these materials.

Of the four options for separation, the most popular option was to collect glass separately. This was mostly due to the potential for contamination – submitters highlighted that broken glass in fibre or other material collections can reduce the quality of recycling, resulting in loss to landfill. In addition, comments were made about glass having much higher recycle rates when collected separately.

Some submitters chose ‘paper/cardboard separate’ option, and some chose the ‘separated, but councils choose’ option. Few submitters chose the ‘status quo – comingled’ option. People who agreed with cardboard separation had similar reasons as for separating glass, such as reducing contamination and litter, and increasing quality of recycling.

Many submitters had views about how separate collections should be implemented. Some commented that it should be kept simple. Other concerns included:

- a current lack of funding and infrastructure for local councils – further investment is needed for separation at source to work
- availability and safety of manual labour workforce
- consequences of increased numbers of trucks on the road.

Four of the eight councils who currently collect glass in comingled bins made individual submissions, with two council views represented by the Canterbury Mayoral Forum submission. Four submissions preferred the status quo. Three councils proposed the concept of minimum quality standards instead, with councils and commercial operators able to choose the collection methodology, provided they met the standard. Two councils wanted to see extra funding for glass collections. Another wanted to understand the impact of the NZ CRS and bed down other changes in its recycling services before considering whether further separation is needed.

## 19.2. Implementation of separate glass or paper/cardboard collection

**Question 63:** If glass or paper/cardboard is to be collected separately, should implementation:

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

Selection	Total	Per cent
Begin immediately	107	67%
Wait for any NZ CRS scheme design to be finalised	33	20%
Wait until the impact of a NZ CRS scheme has been observed	20	13%
<b>Total responses</b>	<b>160</b>	

The most popular choice was the ‘begin immediately’ option. Submitters noted that the benefit of this scheme would be seen immediately and should not be delayed until the implementation of the NZ CRS.

Separated glass collections should begin immediately to preserve the value of other collected recycling streams. To some degree, separated kerbside glass collections should occur autonomously from the implementation of a CRS system, and will likely still account for the majority of glass collected. The CRS system should be designed to complement and catch beverage containers that are being missed by improved kerbside systems to not undermine the changes to kerbside systems, and allow the two systems to target different kinds of waste so that the effects of implementing both are additive. – Waste and Circular Economy Engineering Staff at Beca Ltd (20173)

However, many of these submitters caveated this support, stating that implementation should only begin immediately where practical, where councils already have the means and infrastructure in place, and within a reasonable timeframe.

Implementation of separate glass and cardboard collections should begin immediately wherever possible and with a reasonable timeframe for those that would have to make significant changes to their kerbside systems. – Employers and Manufacturers Association (20277)

A few submitters said that this should not begin immediately if it means a higher cost to councils.

It depends on who is funding the separate collection and who is taking the risk with the investment in new vehicles and contracts. At the moment, the proposal seems to require Councils to take all of that risk and cost which is completely unfair. – Whangārei District Council (20139)

A few submitters preferred the 'wait for the NZ CRS design scheme to be finalised' option. These submitters considered that if systems were not already in place for separation, then regions without those systems should wait. Others noted there is a lot of uncertainty about the design of the NZ CRS, and councils will require support (eg, funding) to make kerbside collection changes.

A few submitters preferred the 'wait until the impact of a NZ CRS scheme has been observed' option. These submitters commented that a NZ CRS may mean that separation of glass is no longer necessary or viable. These submitters raised similar concerns to those who preferred to wait for finalisation of a NZ CRS design, stating that the impact of a NZ CRS is uncertain, and so the level of support councils may require remains uncertain as well.

A container return scheme could impact significantly on glass kerbside collections, and it could become no longer viable, so the Council recommends that the separation of material (glass) at kerbside should be placed on hold until the impact of the container return scheme is known – Hurunui District Council (20290)

One affected council wanted to wait until the impact of a NZ CRS was observed because most glass received at its material recovery facility is made up of beverage containers. Auckland Council said it believes the NZ CRS has the potential to reduce this substantively and wishes to understand the impacts of the NZ CRS to enable the review of processing contracts and collection services.

## 20. Proposal 6: All urban populations should have access to kerbside dry recycling

Please refer to Table 1 for quantification of submitters.

### Status quo

Not every council provides kerbside recycling collections. Where kerbside services are not offered, households must take items to transfer stations or rural recycling stations.

Of the 67 local councils in Aotearoa New Zealand, 59 provide or fund recycling collections. Six councils do not fund kerbside recycling collections, and households pay a private service provider to arrange a collection. Two councils have no, or extremely limited, kerbside recycling collections and no private providers.

Household recycling rates for councils without council-funded kerbside collections are low or unknown. Based on publicly available information, diversion rates range from 16 to 28 per cent for councils where only private collections are available, compared to an average national diversion rate of 35 per cent.<sup>25</sup>

### Proposed changes

The Ministry is proposing that, at a minimum, all urban centres with a population of over 1,000 should have access to council-funded kerbside recycling services. This would give an additional 200,000 people access to recycling in areas where services are currently private or not provided at all.

The Ministry is proposing that kerbside collections for dry recycling should be implemented within two years of a council's next WMMP, or by 2026, whichever is sooner.<sup>26</sup> Councils would still have the choice to offer rubbish collections.

### 20.1. Councils offering kerbside recycling services

**Question 64:** Should all councils offer household kerbside recycling services?

Submission type	Option	Total	Per cent
Short form	Yes	1,278	98%
	No	27	2%
	<b>Total responses</b>	<b>1,305</b>	

<sup>25</sup> *Transforming recycling*, note 1 above, table 6, p 93.

<sup>26</sup> Next reviews of Waste Management and Minimisation Plans: 2023 (Far North District Council, Kaipara District Council, Kāpiti District Council, Upper Hutt City Council); 2024 (Rangitikei, Waitaki); 2027 (Whanganui). *Transforming recycling*, note 1 above, p 94.

Submission type	Option	Total	Per cent
Detailed	Yes	196	94%
	No	12	6%
	<b>Total responses</b>	<b>208</b>	
Combined	Yes	1,474	97%
	No	39	3%
<b>Total responses</b>		<b>1,513</b>	

Most submitters agreed that all councils should offer household kerbside recycling services. These submitters considered that offering kerbside recycling services provided households with opportunity to responsibly deal with their waste and noted that it was important to move our economy to a more circular and sustainable economy.

...we believe all councils should offer recycling services as part of their obligation to manage waste, in a way that best fits their geographical/population density constraints and is sized correctly for the volume of wastes expected to be generated. – Waste and Circular Economy Engineering Staff at Beca Ltd (20173)

Some submitters offered conditional support, or emphasised considerations for communities that do not meet the minimum urban centre population of over 1,000. These submitters considered that there should be alternative options or exemptions for places where kerbside recycling was not economically or geographically feasible (eg, isolated rural communities), such as access to council recycling services via drop-off centres, centralised hubs, or transfer stations:

Waipā District Council does service all properties (urban and rural) but it is a costly exercise per household for the rural proportion. There are other districts with much higher rural population and even lower rural density, so the kilometres travelled to collect from rural properties would be very expensive for those councils. And perhaps recycling depots are more suitable in those areas. – Waipā District Council (20069)

Few submitters disagreed with all councils offering household kerbside recycling services. Reasons for disagreement were similar to the suggested changes above, such as concern about rural communities and increased cost to ratepayers.

...kerbside collection may also not be the best or most efficient form of recycling service for rural areas of the country, especially sparsely populated areas. This is exacerbated by the lack of local infrastructure, the significant distances some councils would have to transport materials to a processing plant, and the ability of ratepayers and levy funds to fund the services, transport and processing costs. – Canterbury Mayoral Forum (20268)

Four of the five councils which would need to implement kerbside collections answered this question. Some councils considered that the producers and consumers of waste should fund the collection of waste, and that kerbside recycling collections should not be the responsibility of the ratepayer.

...waste services should be based on the user-pays principle, by making it visible to the user in the most direct manner how much kerbside collections and waste disposal costs, rather than making these cost part of an annual rates bill ... direct cost to a household is probably the best driver for behaviour change. – Kāpiti Coast District Council (20354)

Others said that their existing collections were sufficiently effective and proposed that they should be given the opportunity to meet the standards set with their current recycling/diversion processes before implementing a kerbside collection. One council that would be affected if the proposal were implemented<sup>27</sup> noted that it did not know how a kerbside collection would be implemented, as it was not supported by the community, and reiterated earlier suggestions about the need for alternative solutions where kerbside recycling was not feasible.

Submitters who lived in council areas without council kerbside collections were almost all in favour, from 48 out of 52 submissions.

Our local council – Upper Hutt City Council – dropped kerbside recycling about a decade ago on the basis of cost, and refuses to reintroduce one for the same reason despite considerable community desire. Upper Hutt’s 50,000 residents must use a single recycling point at one end of the city, which the council only grudgingly provided. Upper Hutt consequently has a very low level of recycling compared to most urban areas. Recycling is a community good not an individual good. It consequently only works where it is easy to do. Kerbside recycling must therefore be provided by all councils, especially in urban areas, or some communities like Upper Hutt miss out. We are all poorer for that.

– Individual (18510)

...And to smaller towns. In my town, for example, many people burn or bury rubbish to avoid having to pay for recycling or rubbish pick up. This could be easily avoided by having a rates-paid service. – Individual (20024)

## 20.2. Services offered at a minimum to all urban areas

**Question 65:** Should these services be offered at a minimum to all population centres of more than 1,000 people?

Submission type	Option	Total	Per cent
Short form	Yes	1,168	90%
	No	40	3%
	Unsure	95	7%
	<b>Total responses</b>	<b>1,303</b>	
Detailed	Yes	180	93%
	No	13	7%
	<b>Total responses</b>	<b>193</b>	
Combined	Yes	1,348	90%
	No	53	4%
	Unsure	95	6%
<b>Total responses</b>		<b>1,496</b>	

<sup>27</sup> Waitaki District Council (20381)

Most submitters supported this proposal, including one of the five councils which would be affected if the proposal were implemented.<sup>28</sup> Submitters felt that this would ensure consistency across Aotearoa New Zealand and would ensure people have the opportunity to deal with their waste responsibly.

Hamilton City Council fully supports an approach that will lead to greater consistency of services and infrastructure across the country. There will be the reality of some small, rural, and or remote communities where it is not realistic to provide the same level of service as a more densely populated area. Alternative approaches should be supported for local solutions in these communities. – Hamilton City Council (20401)

There were mixed views on whether population centres of more than 1,000 people were appropriate in terms of size. Some submitters felt that the population threshold should be even smaller (eg, more than 500 people), or that everyone should receive a collection service regardless of population size. A few submitters noted that in rural areas many people choose to burn or bury their rubbish, to avoid having to pay for a service, and this could be avoided if a kerbside recycling collection were funded by rates. Some submitters were concerned that smaller population areas were being ignored.

It seems that the majority of towns without council funded recycling are popular summer tourist destinations which would expand in population significantly between December and April. At the very least, there should be a collection system in place for those areas during peak summer/holiday periods. We should also be maximising the materials collected at kerbside, not reducing these to meet a self-imposed standard. – Sanitarium Health Food Company (20316)

Yes, at least. Smaller communities should have access to a local comprehensive recycling facility. – Owhiro Bay Residents Association (20192)

On the other hand, there were two submitters that considered that the minimum of 1,000 or more was too low, and they thought it should be closer to 5,000.

Council is concerned about the viability of collections in smaller settlements and suggests the proposed population size requiring a kerbside collection service is too low. Council requests that the Ministry considers raising the population which triggers mandatory kerbside collections to 5,000. – Rangitikei District Council (20369)

A few submitters did not agree, including one of the four councils which would be affected by the proposal being implemented.<sup>29</sup> There were similar issues raised as in [Question 64](#), such as economic viability, the environmental impact of increased carbon emissions, the additional rates burden on residents, and that opportunities for councils to amalgamate services should be considered.

No, a threshold of 1,000 is too broad to mandate the provision of such a costly service and this must be subject to a [cost-benefit analysis]. Other factors, such as population density and travel distances need to be factored in when setting a threshold. Further we should be maximising the materials collected at kerbside not reducing these to meet a self-imposed standard.  
– Soft Plastic Recycling Scheme (20319)

---

<sup>28</sup> Waitaki District Council (20381)

<sup>29</sup> Rangitikei District Council (20369)



A few submitters queried whether a population measure was the best approach and whether other factors should be considered, such as population density, local geography, available workforce, travel time, and accessibility.<sup>30</sup>

## 20.3. Implementation for councils without council-funded kerbside recycling

**Question 66:** Do you agree that councils without any council-funded kerbside recycling collections should implement these collections within two years of their next WMMP?

Submission type	Option	Total	Per cent
Detailed	Yes	147	84%
	No	28	16%
	Total responses	175	

Most submitters supported the suggested timeframe, commenting that these changes should be implemented as soon as possible, especially to influence consumer behaviour change in the near term.

Some submitters caveated their support, suggesting extending the timeframe to give councils time to plan and implement a new service. Some submitters noted the Ministry should work with each council individually and provide support (eg, financial support), as each council would have different needs to successfully implement a new service.

The council agrees this is a fair time frame but recognises that some councils may require financial support to implement such services if not planned for as part of their long-term plan. – Hurunui District Council (20290)

A few submitters, including local government, DHBs and individuals, said that the timeframe should be independent from the WMMP. A few individuals suggested the timeframe should be sooner.

This should be implemented as soon as practicably possible. The next round of council Waste Management and Minimisation Plan, which is aligned to their long-term Planning process, is the opportunity to ensure funding allocation is done and time frames set.  
– MyNoke – Noke Ltd (20240)

A few submitters highlighted overarching concerns about this proposal, such as existing challenging local factors (geographical and financial) which might impede kerbside collections being implemented within this timeframe, as well as uncertainty about the impact of a NZ CRS. These submitters, including local government and DHBs, noted that being linked to WMMPs was confusing, as the timeframes were different. Submitters wanted to see timeframes linked to Long-term Plans (LTPs).

<sup>30</sup> The Stats NZ definition of an urban area is the proposed definition and does include population density and other factors. Retrieved from <https://www.stats.govt.nz/methods/statistical-standard-for-geographic-areas-2018/> (10 November 2022).

A few submitters noted that councils have existing contracts and obligations to be considered, and there should be flexibility from central government to accommodate this. Submitters also raised resourcing issues, such as the nationwide shortage of truck drivers.

Of the five councils that would be affected by this proposal being implemented, only one responded to this question.<sup>31</sup> This council noted that if councils were required to implement a kerbside collection service, it should be when the council deems it feasible according to their LTP, and within five years of the services becoming mandated.

## 20.4. Research, technical support or behaviour change initiatives

**Question 67:** What research, technical support or behaviour-change initiatives are needed to support the implementation of this programme of work?

Many submitters noted that a range of support was needed to implement the changes, and much of that support would require funding. Many submitters commented that public education and resources were required to encourage behavioural change. Suggestions included:

- public awareness campaigns and clear messaging, ensuring information is accessible to all
- ensuring information is available via product packaging, websites, mobile phone apps, and social media
- school and community education for children and families, and collaborating with local community groups.

We suggest that nationally consistent messaging and behaviour change campaigns are critical. We also suggest that the development of a national app to pass through important information. – Palmerston North City Council (20365)

Some submitters, including from local government and industry, suggested further research, data, and evidence, and improved infrastructure. Suggestions included:

- best-practice international case studies
- understanding actual versus perceived drivers of successful behavioural change
- technical research and support – research and development into bin design, material recovery facilities and systems
- market research
- a full cost-benefit analysis of different models to ensure efficacy.

In addition to funding support, research and technical support is required to make the sorting of mixed recycling more cost effective. This is due to the combination of the difficulty of sourcing labour at minimum cost to sort recycling manually, and the inefficiency of this compared to the potential of robotic or machine sorting which could lower the cost of processing drastically. – Manawātū District Council (20338)

Information and advice on implementing these changes needs to be available to councils. This should include examples of best practice and cost-benefit analysis of different

---

<sup>31</sup> Waitaki District Council (20381)

models. When councils implement such changes a lot of time is spent researching different models and costs. We recommend that work is undertaken to summarise examples already in practice – Whakatāne District Council (20387)

A few submitters supported monitoring and reporting, fines and incentives, standard recycling labelling to help understanding of what can be recycled, or regulation.

## **Part 3: Te whakawehe i ngā para kai ā-pakihi – Separating business food waste**

## 21. Source separation of food waste is phased in for all businesses

Please refer to Table 1 for quantification of submitters.

### 21.1. Commercial businesses diverting food waste from landfills

**Question 68:** Should commercial businesses be expected to divert food waste from landfills as part of reducing their emissions?

Submission type	Option	Total	Per cent
Short form	Yes	943	96%
	No	39	4%
	<b>Total responses</b>	<b>982</b>	
Detailed	Yes	199	96%
	No	8	4%
	<b>Total responses</b>	<b>207</b>	
Combined	Yes	1,142	96%
	No	47	4%
<b>Total responses</b>		<b>1189</b>	

Most submitters supported the proposal for commercial businesses to divert food waste from landfills as part of reducing their emissions. The rationale was to encourage businesses to reduce and prevent food waste, reduce emissions, and help to create a circular economy. Many individual submitters and businesses wanted businesses and employees to take responsibility for food waste, alongside councils and households. Many submitters including supermarkets, DHBs and charities/NGOs wanted to prioritise preventing food from becoming waste and redistributing food to people in need. These submitters sought a more coordinated, scaled-up approach to such initiatives.

As well as being an important driver for diverting organics from landfill, emissions reductions should be a means to incentivise and eventually require businesses to prevent food waste at source – everything from managing procurement, stock, retail, portion sizes etc. to food rescue. There are numerous tools either in use or development that could be used to support businesses to understand and adapt their food waste habits and measure the greenhouse gas savings of doing so. – Protect Our Winters NZ (20201)

We need to prioritise the prevention of food loss and waste so that the resources used to produce, process, store, and distribute food are not wasted. – Food Waste Innovation (20398)

Some submitters, including councils and businesses, supported the proposal as long as there would be accessible and effective collection and processing facilities, appropriate solutions for different types of food waste, and uses for the end products. Some councils noted that rural

areas may have less access to collections and processing, and agreed with the proposal that businesses should be able to choose how to deal with their food waste once separated.

In a district like Hurunui, it would seem detrimental to the environment and reducing carbon to undertake a collection service over such a large geographical area and transport the material collected to Christchurch. It would also be a costly service to provide due to the small population base. Numerous other districts in New Zealand would be in the same position. Using the food waste locally for animal feed and encouraging the use of composting and wormeries would be so much more suited to rural districts. – Hurunui District Council (20290)

A few submitters, including businesses and industry associations, wanted the Government to provide support, and to encourage but not mandate the proposal.

Yes. With a caveat that commercial businesses should be supported, rather than expected, to achieve this. For small businesses, in particular those in the Hospitality sector, we are facing a significant amount of change due to government policy, and this comes at a time of extreme hardship due to the legacy impacts of [COVID-19]. The compliance costs that come with these changes will impact our bottom lines and given the varied (and often insufficient) access to processing services; businesses should be supported to divert food waste from landfill through Government investment in the expansion of such services. – Restaurant Association of New Zealand Inc (20395)

A few submitters, mostly individuals and businesses, disagreed with the proposal. These submitters were concerned about mandating the proposal, noting that many businesses – including those that produce food – already separated food waste, and that other existing measures would support a reduction in food waste going to landfill. A few businesses and industry associations expressed concerns about the costs to businesses.

Many of our members' businesses are already separating their waste and we believe other measures including the annual increase of the waste levy over the next 3 years will be effective in changing behaviour. – New Zealand Association of Bakers (20232)

## 21.2. Commercial businesses diverting food waste from landfills by 2030

**Question 69:** Should all commercial businesses be diverting food waste from landfills by 2030?

Submission type	Option	Total	Per cent
Detailed	Yes	157	86%
	No	26	14%
	Total responses	183	

Most submitters agreed with the proposal for commercial businesses to be diverting food waste from landfills by 2030. A few submitters noted that some businesses are already reporting on food waste diversion in their Annual Sustainability Reports.

Some submitters (including businesses, industry associations and councils) caveated that their agreement was subject to processing infrastructure being in place by that time.

...there needs to be access to infrastructure and identified markets for food waste products such as compost. It will be critical to connect these outcomes between local government, commercial providers and the businesses diverting waste. – Tasman District Council (21441)

Some submitters considered that this should happen sooner, with many of these submitters suggesting this should happen by 2025, as 2030 was too late. The rationale was that in some areas there are already solutions for food waste, including opportunities to build on smaller local solutions, and many bigger businesses would likely already have the funds and access to infrastructure.

It is likely the requirement could be phased in much earlier in some areas where there are solutions for food waste now, and likewise, local authorities and private enterprises should be encouraged to be thinking ahead so that we are using food waste as a resource as soon as we can. At WWNZ, we have committed to sending zero food waste to landfill from our Countdown stores by 2025. – Woolworths New Zealand (20388)

A few submitters, including councils, noted that further work was required to define 'commercial businesses'.

There were mixed views on whether all commercial businesses should be included. Comments included that this depended on: the size of the business or number of people on the premises, whether the business was food-related, and access to processing facilities.

Nelson City Council agrees with the timeline in principle, as this will be a factor in supporting development of food processing options appropriate to each region and type of organic waste, and infrastructure. However, diversion of commercial food waste may not come as a "one size fits all" option, and [...] we believe that further work on defining criteria may need to be done before final timeframes are set. – Nelson City Council (20132)

Some submitters, including businesses and DHBs, wanted to clarify responsibilities for their staff, contractors or customers in diverting food waste. Some councils sought further details on who would provide collection services, and how monitoring, reporting, and enforcing the proposal would work.

A few submitters, including businesses and two councils, did not agree that it should be mandatory by 2030.

We do not oppose larger businesses with significant levels of food waste from being required to divert food waste from landfills by 2030, particularly those that produce and/or sell food. However, we do not agree that all businesses should be covered. – Plastics New Zealand Inc (21425)

No, Waipā District Council does not agree. Timelines should be developed for each region, depending on equitable access to local infrastructure available to take food waste without undue cost burden to local businesses. Key infrastructure needs to come first. – Waipā District Council (20096)

## **21.3. Phasing in depending on access to suitable processing facilities**

**Question 70:** Should separation be phased in, depending on access to suitable processing facilities (eg, composting or anaerobic digestion)?

Submission type	Option	Total	Per cent
Detailed	Yes	150	86%
	No	24	14%
	<b>Total responses</b>	<b>174</b>	

Most submitters agreed that separation should be phased in, depending on access to suitable processing facilities. A few submitters noted that phasing in by 2030 would allow time to trial new processes to identify good solutions, and to develop infrastructure where it does not currently exist.

Yes. The RIS states that, for example, businesses with access to existing food scraps collections could have until 2025 to separate food scraps, while businesses further away and where new facilities may have to be built could have until 2030. We agree with this approach. For facilities with access to composting/anaerobic digestion facilities, these facilities should face few barriers to redirecting food waste. Phasing in these changes will allow infrastructure to build as demand increases and allow markets to develop for the food waste. – Bay of Plenty District Health Board<sup>32</sup> (20262)

Separation should be introduced as soon as possible and phased in where access to suitable processing facilities is an obstacle. We consider careful thought should be applied as to what systems are encouraged for compostable food and garden waste management so that the system used is fit for purpose, affordable, accessible and easy to operate.  
– Queenstown Airport (20311)

However, some submitters, including businesses, reiterated that businesses that already have this infrastructure available to them should start sooner than 2030.

A few councils, businesses and others were concerned with the need to prevent unintended consequences such as additional costs contributing to consumer price index costs or transport emissions. A few councils said that the suggested 150-kilometre radius was too far. A few other councils and businesses commented that food waste collection needs to be coordinated with processing capacity, and that there should be incentives for early implementers.

A few submitters, including food manufacturers, said they needed more resources, time and equipment to divert food waste, especially packaged food that must be removed from packaging.

The existing network of compost facilities, anaerobic digestors and companies accepting food waste as stock food is not sufficient to process the large and unpredictable quantities of food waste produced by food manufacturers. This is particularly true of certain regions of New Zealand, where the nearest commercial-scale organic waste facility would be many hundreds of kilometres away. We also note that as a considerable proportion of food waste is packaged, investment would likely be required in machinery to depackage this waste before it could be effectively treated – Fonterra (21446)

A few submitters, including businesses, disagreed with a phased approach, as they disagreed with mandating separating food waste.

---

<sup>32</sup> See note 7, referencing the fact that DHBs have been disestablished, so this submission does not necessarily reflect the views of Te Whatu Ora, the successor organisation.



## 21.4. Shorter lead-in times for businesses that produce food

**Question 71:** Should businesses that produce food have a shorter lead-in time than businesses that do not?

Submission type	Option	Total	Per cent
Detailed	Yes	122	71%
	No	51	29%
	<b>Total responses</b>	<b>173</b>	

Most submitters agreed there should be a shorter lead-in time for businesses that produce food. Some submitters commented that it would be easier for food producers, and they were likely to already be separating food waste or planning how to do this. A few DHBs, councils and other submitters noted that a focus on these businesses would have the biggest impact, as they were more likely to generate higher levels of food waste, and this would stimulate demand for new services and processing facilities.

Hawke's Bay is home to large food producing companies and the volume of food waste that is land filled by these businesses would be reduced/eliminated if there was a national requirement to divert this material to other beneficial reuse options/facilities. At the moment landfill is the cheapest option, and the infrastructure is limited to de-package.  
– Hastings District Council (20351)

A few submitters raised the need to consult with food-producing businesses to ensure sensible and workable solutions were developed.

There were mixed views from some submitters on whether the lead-in times should be about access to processing facilities, the amount or type of food waste generated, or the type of business (ie, food manufacturing, supermarket, or hospitality).

We agree with the Zero Waste Network that this is too blunt a measure. Timeframes should rather be based on the amount and type of food waste produced. This should include different requirements for different business types, eg, food manufacturing vs hospitality. – Āmiomio Aotearoa (20203)

CODC supports a timeframe based on the ability of businesses to access suitable organics processing facilities. We note that in our District those businesses that are higher producers of food waste (e.g., supermarkets and cafes/restaurants), are more likely to already have some food waste diversion already in place, for example with an agreement with a local pig farmer or other local options. – Central Otago District Council (20130)

Some submitters, including councils and industry associations, opposed shorter lead-in times for businesses that produce food. A few of these submitters said that all businesses should have the same lead-in time, which should be as soon as possible. A few others noted that shorter lead-in times for businesses that produce food could be too complicated, unfair, inconsistent, confusing, or could create too much pressure.

No. The Hospitality sector has been significantly impacted by the pandemic and has only recently been able to begin our recovery. Further, many businesses which produce food already have food waste minimisation strategies in place and rushing through new requirements for Hospitality businesses will only add to the pressures we are currently

experiencing and move our current engagement in minimising food waste from one of voluntary involvement to a regulatory check-box exercise. – Restaurant Association of New Zealand Inc (20232)

NZW does not consider it appropriate to require businesses that produce food to have a shorter lead-in time than businesses that do not, as the same issues relating to appropriate processing systems and infrastructure will apply – New Zealand Winegrowers (20403)

## 21.5. Exemptions for businesses

**Question 72:** Should any businesses be exempt? If so, which ones?

Submission type	Option	Total	Per cent
Detailed	Yes	25	17%
	No	124	83%
	<b>Total responses</b>	<b>149</b>	

Most submitters did not support any businesses being exempt, stating that all businesses should play their part alongside households.

There is no reason why any business should be given an exemption. MfE must not allow businesses to opt out of protecting our environment and doing everything they can to assist with eliminating our dependence on landfills. If exemptions are given out this [risks] businesses finding loopholes to exempt themselves due to cost and effort to make changes. We strongly disagree with any limitations based on population. – Nonstop Solutions (20103)

A few submitters commented that there may be unintended consequences if there were a requirement to exempt businesses in towns with fewer than 1,000 residents.<sup>33</sup> For example, if there were a food-processing plant in a small town, it would be exempt. A few submitters suggested other options in lieu of exempting some businesses, such as providing subsidies or extra support.

A few submitters said some businesses should be exempt but did not elaborate on which businesses. Some submitters including individuals, councils and businesses said that very small businesses should be exempt, or the scheme could be optional for them if it were not financially or practically feasible due to resource or spatial requirements. A few others suggested that very low food waste generators (for example, those producing less than 5kg of food scraps per week) could be exempt.

[...] businesses that produce 'too small to measure' volumes should be exempt. No point making someone document the process for dealing with three tea bags and some orange peel a day. – Individual (20095)

---

<sup>33</sup> The consultation document proposed household food-scraps collections for towns with a population of more than 1,000 residents, or towns with existing kerbside collections only, and asked if the requirement for businesses should also be limited to those in towns with populations of more than 1,000 residents. *Transforming recycling*, note 1 above, p 109.

Other exemptions were suggested for businesses who deal with hazardous materials or toxins where the process could result in contamination, a biosecurity risk or food waste from some healthcare settings.

Exemptions will also be required for food waste which has entered an infectious patient's environment in a healthcare setting. Clarification is required for collection in hospital settings and other large office space sites (for example universities and schools) where there are many staff areas producing small amounts of waste. – various District Health Boards (including Northland, Capital and Coast, Hutt Valley, Nelson Marlborough, Bay of Plenty and Hawke's Bay)<sup>34</sup>.

## 21.6. Support for businesses

**Question 73:** What support should be provided to help businesses reduce their food waste?

Most submitters considered that businesses would require support to implement these proposals. Most submitters supported the Government providing education and resources, including:

- education and training on the waste hierarchy, waste management, information and collateral on what goes where, and processing options
- workshops, coaching and mentoring for businesses suited to their different capabilities, types and sizes
- a national public campaign to support positive behaviour change, with a few submitters suggesting expanding the Love Food Hate Waste campaign to businesses.

Businesses should be informed of their options for separating and diverting food waste. This could include providing examples of how it could be implemented on their site, detailed templates, case studies, and approaches currently used by other businesses. Education and assistance for businesses through this transition will be critical.  
– Dunedin City Council (20079)

Some submitters noted that free or subsidised bins would be required, including different bins for different food waste, along with a regular food-waste collection service. Some submitters discussed the need for commercial composting solutions or transport and storage systems for edible food waste.

We would like to see emphasis on the role of local food systems (eg, urban farming, connecting communities to where their food comes from and why compost is important) to help reduce waste at source, and to encourage greater kai sovereignty. – Sustainability Trust (20194)

Some submitters wanted the Government to invest in a range of areas to help to implement the changes. Ideas included funding for community and regional initiatives and infrastructure, anaerobic digestors and onsite composters, existing organisations and projects focused on reducing food waste, waste audits, regional funds, innovation funds, and co-investing with businesses.

---

<sup>34</sup> See note 7, referencing the fact that DHBs have been disestablished, so this submission does not necessarily reflect the views of Te Whatu Ora, the successor organisation.

Smaller businesses may struggle with the increased compliance cost; a decreasing subsidy could be applied for, to provide assistance for a short period of time. – BioRich (20331)

A few submitters suggested incentives to divert food waste and make it as easy as possible for businesses to achieve.

Other ideas for support included:

- further research on the outputs and outcomes of processing solutions
- organics-management guidelines and composting standards
- faster consenting for processing facilities
- increased landfill fees
- shared schemes, with businesses working together
- new businesses being required to provide a plan for diverting food waste when they become registered and existing businesses transitioning to providing these plans
- requirements for commercial waste companies to support the scheme.

# Appendix 1: Support for specific proposals

This appendix provides the level of support for the proposals, drawn from submissions to the Citizen Space platform. These figures do not include indications of support made via email. However, email submissions, including levels of support are reflected in the analysis in the body of the report.

## Appendix A: Specific proposals – container return scheme

### Q1: Do you agree with the proposed definition of a beverage?

Submission type	Option	Total	Per cent
Detailed	Yes	216	93%
	No	17	7%
	Total responses	233	

### Q2: Do you agree with the proposed definition of an eligible beverage container?

Submission type	Option	Total	Per cent
Detailed	Yes	206	92%
	No	18	8%
	Total responses	224	

### Q3: Do you support the proposed refund amount of 20 cents?

Submission type	Option	Total	Per cent
Short form	Yes	1,207	90%
	No	132	10%
	Total responses	1,339	
Detailed	Yes	235	77%
	No	69	23%
	Total responses	304	
Combined	Yes	1,442	88%
	No	201	12%
Total responses		1,643	

**Q4 (short-form submissions): How would you like to receive your refunds for containers?**  
Please select all that are relevant and select your preference.

	Respondents	Strongly Preferred	Preferred	No preference	Not preferred	Strongly against
Cash	1,099	264 24%	251 23%	289 26%	195 18%	100 9%
Electronic funds transfer	1,138	531 47%	351 31%	148 13%	71 6%	37 3%
Vouchers	1,067	94 9%	185 17%	247 23%	335 31%	206 19%
Donations	1,127	228 20%	406 36%	308 27%	116 10%	69 6%
Access to all options	1,145	497 43%	350 31%	180 16%	59 5%	59 5%
Other	430	37 9%	14 3%	317 74%	26 6%	36 8%

**Q4 (detailed submissions): How would you like to receive your refunds for containers?**  
Please select all that are relevant and select your preference.

	Respondents	Strongly Preferred	Preferred	No preference	Not preferred	Strongly against
Cash	143	58 41%	33 23%	22 15%	14 10%	16 11%
Electronic funds transfer	143	72 50%	45 31%	11 8%	11 8%	4 3%
Vouchers	134	19 14%	36 27%	28 21%	31 23%	20 15%
Donations	137	28 20%	58 42%	32 23%	11 8%	8 6%
Access to all options	151	79 52%	32 21%	18 12%	17 11%	5 3%
Other	46	16 35%	5 11%	22 48%	1 2%	2 4%

**Q4 (short-form and detailed combined): How would you like to receive your refunds for containers? Please select all that are relevant and select your preference.**

	Respondents	Strongly Preferred	Preferred	No preference	Not preferred	Strongly against
Cash	1,242	322 26%	284 23%	311 25%	209 17%	116 9%
Electronic funds transfer	1,281	603 47%	396 31%	159 12%	82 6%	41 3%
Vouchers	1,201	113 9%	221 18%	275 23%	366 30%	226 19%
Donations	1,264	256 20%	464 36%	340 26%	134 10%	91 7%
Access to all options	1,296	576 44%	382 29%	198 15%	76 6%	64 5%
Other	476	53 11%	19 4%	339 71%	27 6%	38 8%

**Q5: Do you support the inclusion of variable scheme fees to incentivise more recyclable packaging and, in the future, reusable packaging?**

Submission type	Option	Total	Per cent
Detailed	Yes	199	90%
	No	21	10%
	Total responses	220	

**Q6: Do you agree with the proposed broad scope of beverage container material types to be included in the NZ CRS?**

Submission type	Option	Total	Per cent
Short form	Yes	1201	90%
	No	139	10%
	Total responses	1,340	
Detailed	Yes	178	82%
	No	40	18%
	Total responses	218	
Combined	Yes	1,379	89%
	No	179	11%
Total responses		1,558	

**Q7: If you do not agree with the proposed broad scope (refer to Question 6), please select all container material types that you think should be included in the scheme.**

Material type	Total	Per cent
Glass	63	88%
Plastic (PET 1, HDPE 2, PP 5, and recyclable bio-based HDPE 2 and PET 1)	62	86%
Metal (eg, aluminium, steel, tinplate and bimetals)	62	86%
Liquid paperboard (LPB)	49	68%
<b>Total responses</b>	<b>72</b>	

**Q8: Do you support a process where alternative beverage container packaging types could be considered on a case-by-case basis for inclusion within the NZ CRS?**

Submission type	Option	Total	Per cent
Detailed	Yes	196	93%
	No	14	7%
	<b>Total responses</b>	<b>210</b>	

**Q9: Do you agree with the proposal to exempt fresh milk in all packaging types from the NZ CRS?**

Submission type	Option	Total	Per cent
Short form	Yes	523	40%
	No	786	60%
	<b>Total responses</b>	<b>1,309</b>	
Detailed	Yes	69	34%
	No	135	66%
	<b>Total responses</b>	<b>204</b>	
Combined	Yes	592	39%
	No	921	61%
<b>Total responses</b>		<b>1,513</b>	

**Q10: Do you support the Ministry investigating how to target the commercial recovery of fresh milk beverage containers through other means?**

Submission type	Option	Total	Per cent
Detailed	Yes	130	63%
	No	77	37%
	<b>Total responses</b>	<b>207</b>	



**Q11: Do you support the Ministry investigating the option of declaring fresh milk beverage containers made out of plastic (eg, plastic milk bottles and LPB containers) a priority product and thereby including them within another product-stewardship scheme?**

Submission type	Option	Total	Per cent
Detailed	Yes	120	56%
	No	96	44%
	Total responses	216	

**Q12: We are proposing that beverage containers that are intended for refilling and have an established return/refillables scheme would be exempt from the NZ CRS at this stage. Do you agree?**

Submission type	Option	Total	Per cent
Detailed	Yes	132	65%
	No	71	35%
	Total responses	203	

**Q13: Should there be a requirement for the proposed NZ CRS to support the Aotearoa New Zealand refillables market (eg, a refillable target)?**

Submission type	Option	Total	Per cent
Detailed	Yes	162	82%
	No	36	18%
	Total responses	198	

**Q15: Are there any other beverage packaging types or products that should be considered for exemption?**

Submission type	Option	Total	Per cent
Detailed	Yes	25	14%
	No	160	86%
	Total responses	185	

**Q16: Do you agree that the size of eligible beverages containers would be three litres and smaller?**

Submission type	Option	Total	Per cent
Detailed	Yes	164	77%
	No	49	23%
	Total responses	213	

**Q17: Do you think that consumers should be encouraged to put lids back on their containers (if possible) before they return them for recycling under the scheme?**

Submission type	Option	Total	Per cent
Detailed	Yes	145	76%
	No	45	24%
	Total responses	190	

**Q18: Do you agree that the scheme should provide alternative means to capture and recycle beverage container lids that cannot be put back on containers? If so, how should they be collected?**

Submission type	Option	Total	Per cent
Detailed	Yes	166	88%
	No	23	12%
	Total responses	189	

**Q19: Do you agree that a NZ CRS should use a 'mixed-return model' with a high degree of mandated retail participation to ensure consumers have easy access to container return/refund points, as well as the opportunity for voluntary participation in the network by interested parties?**

Submission type	Option	Total	Per cent
Detailed	Yes	189	86%
	No	30	14%
	Total responses	219	

**Q20 (detailed submissions): Where would you find it easiest to return eligible beverage containers? Please select all that are relevant and rank these from most preferred to least preferred**

	Respondents	Strongly Preferred	Preferred	No preference	Not preferred	Strongly against
Commercial recycling facility	161	38 24%	52 32%	33 20%	26 16%	12 7%
Waste transfer station	159	34 21%	55 35%	27 17%	33 21%	10 6%
Other community hubs/centres	168	68 40%	64 38%	24 14%	9 5%	3 2%
Local retail outlet that sells beverages	173	89 51%	51 29%	19 11%	5 3%	9 5%
Supermarket	180	132 73%	29 16%	12 7%	2 1%	5 3%
Community recycling/ resource recovery centre	166	82 49%	54 33%	21 13%	6 4%	3 2%
Shopping centre/ mall	146	61 42%	51 35%	24 16%	6 4%	4 3%

**Q20 (short-form submissions): Where would you find it easiest to return eligible beverage containers? Please select all that are relevant and rank these from most preferred to least preferred**

	Respondents	Strongly Preferred	Preferred	No preference	Not preferred	Strongly against
Commercial recycling facility	1,089	142 13%	269 28%	317 29%	286 26%	75 7%
Waste transfer station	1,104	154 14%	285 26%	284 26%	297 27%	84 8%
Other community hubs/centres	1,142	372 33%	479 42%	189 17%	75 7%	27 2%
Local retail outlet that sells beverages	1,198	655 55%	366 31%	99 8%	56 5%	22 2%
Supermarket	1,259	862 68%	286 23%	57 5%	38 3%	16 1%
Community recycling/ resource recovery centre	1,177	410 35%	457 39%	195 17%	91 8%	24 2%
Shopping centre/ mall	1,150	477 41%	324 28%	215 19%	93 8%	41 4%

**Q20 (Short-form and detailed submissions combined): Where would you find it easiest to return eligible beverage containers? Please select all that are relevant and rank these from most preferred to least preferred.**

	Respondents	Strongly Preferred	Preferred	No preference	Not preferred	Strongly against
Commercial recycling facility	1,250	180 14%	321 26%	350 28%	312 25%	87 7%
Waste transfer station	1,263	188 15%	340 27%	311 25%	330 26%	94 7%
Other community hubs/centres	1,310	440 34%	543 41%	213 16%	84 6%	30 2%
Local retail outlet that sells beverages	1,371	744 54%	417 30%	118 9%	61 4%	31 2%
Supermarket	1,439	994 69%	315 22%	69 5%	40 3%	21 1%
Community recycling/ resource recovery centre	1,343	492 37%	511 38%	216 16%	97 7%	27 2%
Shopping centre/ mall	1,296	538 42%	375 29%	239 18%	99 8%	45 3%

**Q21: Retailers that sell beverages are proposed to be regulated as part of the network (mandatory return-to-retail requirements). Should a minimum store-size threshold apply?**

Submission type	Option	Total	Per cent
Detailed	Yes	106	60%
	No	72	40%
	Total responses	178	

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

Submission type	Option	Total	Per cent
Detailed	Over 100 m <sup>2</sup>	37	42%
	Over 200 m <sup>2</sup>	25	28%
	Over 300 m <sup>2</sup>	27	30%
	Total responses	89	

**Q22: Do you think the shop-floor-size requirements for retailers required to take back beverage containers (mandatory return to retail) should differ between rural and urban locations?**

Submission type	Option	Total	Per cent
Detailed	Yes	81	48%
	No	87	52%
	Total responses	168	

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

Submission type	Option	Total	Per cent
Detailed	Over 60 m <sup>2</sup>	31	49%
	Over 100 m <sup>2</sup>	18	29%
	Over 200 m <sup>2</sup>	8	13%
	Over 300 m <sup>2</sup>	6	9%
	Total responses	63	

**Q23: Do you agree that there should be other exemptions for retailer participation? (For example, if there is another return site nearby, or for health and safety or food safety reasons.)**

Submission type	Option	Total	Per cent
Detailed	Yes	128	72%
	No	50	28%
	Total responses	178	

**Q24: Do you agree with the proposed 'deposit financial model' for a NZ CRS?**

Submission type	Option	Total	Per cent
Detailed	Yes	178	89%
	No	21	11%
	Total responses	199	

**Q25: Do you agree with a NZ CRS that would be a not-for-profit, industry-led scheme?**

Submission type	Option	Total	Per cent
Detailed	Yes	163	76%
	No	51	24%
	Total responses	214	

**Q26: Do you agree with the recovery targets for a NZ CRS of 85 per cent by year 3, and 90 per cent by year 5?**

Submission type	Option	Total	Per cent
Detailed	Yes	178	85%
	No	31	15%
	Total responses	209	

**Q27: If the scheme does not meet its recovery targets, do you agree that the scheme design (including the deposit level) should be reviewed and possibly increased?**

Submission type	Option	Total	Per cent
Detailed	Yes	194	92%
	No	17	8%
	Total responses	211	

**Q28: Do you support the implementation of a container return scheme for New Zealand?**

Submission type	Option	Total	Per cent
Short form	Yes	1,232	92%
	No	58	4%
	Undecided	52	4%
	Total responses	1,342	
Detailed	Yes	287	90%
	No	33	10%
	Total responses	320	
Combined	Yes	1,519	92%
	No	91	5%
	Undecided	52	3%
Total responses		1,662	

**Q29: If you do not support or are undecided about a NZ CRS, would you support implementation of a scheme if any of the key scheme design criteria were different? (For example, the deposit amount, scope of containers, network design, governance model, scheme financial model.)**

Submission type	Option	Total	Per cent
Short form	Yes	213	73.20%
	No	78	26.80%
	<b>Total responses</b>	<b>291</b>	
Detailed	Yes	37	77%
	No	11	23%
	<b>Total responses</b>	<b>48</b>	
Combined	Yes	250	74%
	No	89	26%
<b>Total responses</b>		<b>339</b>	

**Question 7 of the short form survey: Do you think refillable beverage containers should be included within a scheme in the future?**

Submission type	Option	Total	Per cent
Short form	Yes	1085	83%
	No	221	17%
	<b>Total responses</b>	<b>1,306</b>	

## Appendix B: Specific proposals – Kerbside recycling

**Q31: Do you agree with the proposal that a standard set of materials should be collected for household recycling at kerbside?**

Submission type	Option	Total	Per cent
Detailed	Yes	281	95%
	No	16	5%
	Total responses	297	

**Q32: Do you agree that councils collecting different material types (in addition to a standard set) might continue to cause public confusion and contamination of recycling?**

Submission type	Option	Total	Per cent
Detailed	Yes	142	77%
	No	43	23%
	Total responses	185	

**Q33: Do you think that national consistency can be achieved through voluntary measures, or is regulation required?**

Submission type	Option	Total	Per cent
Detailed	Yes	19	10%
	No	178	90%
	Total responses	197	

**Q34 (detailed submissions): Please tick below all the items from the proposed list which you agree should be included in the standard set of materials that can be recycled in household kerbside collections**

Material type	Total	Per cent
Glass bottles and jars	185	100%
Paper and cardboard	181	98%
Pizza boxes	149	81%
Steel and aluminium tins and cans	183	99%
Plastic bottles 1 (PET) and 2 (HDPE)	180	97%
Plastic containers and trays 1 (PET) and 2 (HDPE)	179	97%
Plastic containers 5 (PP)	179	97%
Total responses	185	

**Q34 (short-form submissions):** Please tick below all the items from the list below which you agree should be accepted in household kerbside recycling collections.

Material type	Total	Per cent
Glass bottles and jars	1,294	100%
Paper and cardboard	1,296	100%
Pizza boxes	1,046	81%
Steel and aluminium tins and cans	1,293	100%
Plastic bottles 1 (PET) and 2 (HDPE)	1,283	99%
Plastic containers and trays 1 (PET) and 2 (HDPE)	1,279	99%
Plastic containers 5 (PP)	1,265	98%
<b>Total responses</b>	<b>1,296</b>	

**Q34 (Short-form and detailed submissions combined)** Please tick below all the items from the list below which you agree should be accepted in household kerbside recycling collections.

Material type	Total	Per cent
Glass bottles and jars	1,479	100%
Paper and cardboard	1,477	100%
Pizza boxes	1,195	81%
Steel and aluminium cans	1,476	100%
Plastic bottles 1 (PET) and 2 (HDPE)	1,463	99%
Plastic containers and trays 1 (PET) and 2 (HDPE)	1,458	98%
Plastic containers 5 (PP)	1,444	98%
<b>Total responses</b>	<b>1,481</b>	

**Q37: Do you agree that the standard set of materials should be regularly reviewed and, provided certain conditions are met, new materials added?**

Submission type	Option	Total	Per cent
<b>Detailed</b>	Yes	193	98%
	No	3	2%
	<b>Total responses</b>	<b>196</b>	

**Q38: What should be considered when determining whether a class of materials should be accepted at kerbside in the future?**

Selection	Total	Per cent
End-market solutions are circular and minimise environmental harm	167	87%
Viable processing technologies	167	87%
Sustainable end markets	164	85%
Supply chains contribute appropriately to recovery and end-of-life solutions for their products	154	80%
Processing by both automated and manual material recovery facilities	138	72%



No adverse effects, including financial, on local authorities	102	53%
Other	46	24%
<b>Total responses</b>	<b>193</b>	

**Q39: Who should decide how new materials are added to the list?**

Selection	Total	Per cent
Ministry for the Environment staff in consultation with a reference stakeholder group	69	30%
An independent board	66	28%
Other	46	15%
Existing Waste Advisory Board	34	20%
The responsible Minister	17	7%
<b>Total responses</b>	<b>232</b>	

**Q40: Do you agree that, in addition to these kerbside policies, Aotearoa New Zealand should have a network of convenient and easy places where people can recycle items that cannot easily be recycled kerbside? For example, some items are too large or too small to be collected in kerbside recycling.**

Submission type	Option	Total	Per cent
Detailed	Yes	193	99%
	No	2	1%
	<b>Total responses</b>	<b>195</b>	

**Q41: Do you agree that food and garden waste should be diverted from landfills?**

Submission type	Option	Total	Per cent
Detailed	Yes	190	97%
	No	6	3%
	<b>Total responses</b>	<b>196</b>	

**Q42: Do you agree that all councils should offer a weekly kerbside food-scrap collection to divert as many food scraps as possible from landfills? / Should all councils offer kerbside food scraps bins so that food scraps can avoid going to landfill?**

Submission type	Option	Total	Per cent
Short form	Yes	1,179	91%
	No	116	9%
	<b>Total responses</b>	<b>1,295</b>	
Detailed	Yes	232	79%
	No	61	21%
	<b>Total responses</b>	<b>293</b>	
Combined	Yes	1,411	89%
	No	117	11%
<b>Total responses</b>		<b>1,588</b>	

**Q43: Do you agree that these collections should be mandatory in urban areas (defined as towns with a population over 1,000) and in any smaller settlements where there are existing kerbside collections?**

Submission type	Option	Total	Per cent
Detailed	Yes	154	86%
	No	25	14%
	Total responses	179	

**Q44: Do you think councils should play a role in increasing the diversion of household garden waste from landfills?**

Submission type	Option	Total	Per cent
Detailed	Yes	179	83%
	No	37	17%
	Total responses	216	

**If so, what are the most effective ways for councils to divert garden waste?**

Selection	Total	Per cent
Making it more affordable for people to drop off green waste at transfer stations	100	57%
Promoting low-waste gardens (eg, promoting evergreen trees over deciduous)	93	53%
Offering a subsidised user-pays green-waste bin	89	51%
Other	40	23%
Total responses	174	

**Q45: We propose a phased approach to the roll-out of kerbside food-scrap collections. The timeframes will depend on whether new processing facilities are needed. Do you agree with a phased approach?**

Submission type	Option	Total	Per cent
Detailed	Yes	154	86%
	No	25	14%
	Total responses	179	

**Q46: Do you agree that councils with access to suitable existing infrastructure should have until 2025 to deliver food-scrap collections?**

Submission type	Option	Total	Per cent
Detailed	Yes, that's enough time	93	53%
	No, that's not enough time	15	9%
	No, it should be sooner	67	38%
	Total responses	175	

**Q47: Do you agree that councils without existing infrastructure should have until 2030 to deliver food-scrap collections?**

Submission type	Option	Total	Per cent
Detailed	Yes, that's enough time	65	38%
	No, that's not enough time	6	4%
	No, it should be sooner	99	58%
	<b>Total responses</b>	<b>170</b>	

**Q50: For non-food products or packaging to be accepted in a food scraps bin or a food-and-garden-waste bin, what should be taken into consideration? Tick all that apply**

Selection	Total	Per cent
Products help divert food waste from landfills	128	81%
Products meet Aotearoa New Zealand standards for composability	147	92%
Products are certified in their final form to ensure they do not pose a risk to soil or human health	139	87%
Products are clearly labelled so that they can be distinguished from non-compostable products	144	91%
A technology of process is available to easily identify and sort compostable from non-compostable products	114	72%
Producers and users of the products and packaging contribute to the cost of collecting and processing	114	72%
<b>Total responses</b>	<b>159</b>	

**Q52: Do you agree that it is important to understand how well kerbside collections are working?**

Submission type	Option	Total	Per cent
Detailed	Yes	200	100%
	No	1	0%
	<b>Total responses</b>	<b>201</b>	

**Q53: Do you agree with the proposal that the private sector should also report on their household kerbside collections so that the overall performance of kerbside services in the region can be understood?**

Submission type	Option	Total	Per cent
Detailed	Yes	184	96%
	No	8	4%
	<b>Total responses</b>	<b>192</b>	

**Q54: Do you agree that the information should be published online for transparency?**

Submission type	Option	Total	Per cent
Detailed	Yes	188	96%
	No	7	4%
	Total responses	195	

**Q55: Apart from diversion and contamination rates, should any other information be published online?**

Submission type	Option	Total	Per cent
Detailed	Yes	107	80%
	No	27	20%
	Total responses	134	

**Q56: Should kerbside recycling services have to achieve a minimum performance standard (eg, collect at least a specified percentage of recyclable materials in the household waste stream)?**

Submission type	Option	Total	Per cent
Detailed	Yes	162	88%
	No	23	12%
	Total responses	185	

**Q57: Should the minimum performance standard be set at 50 per cent for the diversion of dry recyclables and food scraps?**

Submission type	Option	Total	Per cent
Detailed	Yes	81	68%
	No	39	32%
	Total responses	120	

**Q58: We propose that territorial authorities have until 2030 to achieve the minimum performance target, at which time the target will be reviewed. Do you agree?**

Submission type	Option	Total	Per cent
Detailed	Yes	81	52%
	No	74	48%
	Total responses	155	

**Q59: In addition to minimum standards, should a high-performance target be set for overall collection performance, to encourage territorial authorities to achieve international best practice?**

Submission type	Option	Total	Per cent
Detailed	Yes	157	91%
	No	15	9%

	Total responses	172
--	-----------------	-----

**Q60: Some overseas jurisdictions aim for diversion rates of 70 per cent. Should Aotearoa New Zealand aspire to achieve a 70 per cent target?**

Submission type	Option	Total	Per cent
Detailed	Yes	139	87%
	No	20	13%
	Total responses	159	

**Q62: Should either glass or paper/cardboard be collected separately at kerbside in order to improve the quality of these materials and increase the amount recycled?**

Selection	Total	Per cent
Glass separate	109	54%
Separated, but councils choose which one to separate	40	20%
Paper/cardboard separate	33	16%
Status quo – they remain comingled for some councils	21	10%
Total responses	203	

**Q63: If glass or paper/cardboard is to be collected separately, should implementation:**

Selection	Total	Per cent
Begin immediately	107	67%
Wait for any NZ CRS scheme design to be finalised	33	20%
Wait until the impact of a NZ CRS scheme has been observed	20	13%
Total responses	160	

**Q64: Should all councils offer kerbside recycling to households?**

Submission type	Option	Total	Per cent
Short form	Yes	1,278	98%
	No	27	2%
	Total responses	1,305	
Detailed	Yes	196	94%
	No	12	6%
	Total responses	208	
Combined	Yes	1,474	97%
	No	39	3%
Total responses		1,513	

**Q65: Should these services be offered at a minimum to all population centres of more than 1,000 people?**

Submission type	Option	Total	Per cent
Short form	Yes	1,168	90%
	No	40	3%
	Unsure	95	7%
	<b>Total responses</b>	<b>1,303</b>	
Detailed	Yes	180	93%
	No	13	7%
	<b>Total responses</b>	<b>193</b>	
Combined	Yes	1,348	90%
	No	53	4%
	Unsure	95	6%
<b>Total responses</b>		<b>1,496</b>	

**Q66: Do you agree that councils without any council-funded kerbside recycling collections should implement these collections within two years of their next WMMP?**

Submission type	Option	Total	Per cent
Detailed	Yes	147	84%
	No	28	16%
	<b>Total responses</b>	<b>175</b>	

## Appendix C: Specific Proposals – Separation of business food waste

**Q68: Should commercial businesses be expected to divert food waste from landfills as part of reducing their emissions? Should all businesses also be expected to separate food waste from general rubbish?**

Submission type	Option	Total	Per cent
Short form	Yes	943	96%
	No	39	4%
	Total responses	982	
Detailed	Yes	199	96%
	No	8	4%
	Total responses	207	
Combined	Yes	1,142	96%
	No	47	4%
Total responses		1,189	

**Q69: Should all commercial businesses be diverting food waste from landfills by 2030?**

Submission type	Option	Total	Per cent
Detailed	Yes	157	86%
	No	26	14%
	Total responses	183	

**Q70: Should separation be phased in, depending on access to suitable processing facilities (eg, composting or anaerobic digestion)?**

Submission type	Option	Total	Per cent
Detailed	Yes	150	86%
	No	24	14%
	Total responses	174	

**Q71: Should businesses that produce food have a shorter lead-in time than businesses that do not?**

Submission type	Option	Total	Per cent
Detailed	Yes	122	71%
	No	51	29%
	Total responses	173	

**Q72: Should any businesses be exempt?**

Submission type	Option	Total	Per cent
Detailed	Yes	25	17%
	No	124	83%
	Total responses	149	

## Appendix 2: Glossary

Term	Definition
Anaerobic digestion	The process of breaking down organic material in the absence of oxygen; used to manage waste. The process produces fuel and a fertiliser.
Anaerobic digestion facility	The facility or plant where anaerobic digestion takes place.
Beverage	A beverage (or drink) is a liquid substance that is intended for human consumption by drinking.
Beverage container	A vessel or casing of a beverage (regardless of whether it is sold alone or as a unit in a multipack) that is sealed in an airtight and watertight state at the point of sale.
Circular economy	An economic system based on designing out waste and pollution, reusing products and materials, and regenerating natural systems.
Class 1 (municipal) landfill	Class 1 landfills are Aotearoa New Zealand's most engineered and monitored landfills because they take waste that could discharge contaminants or emissions. All household waste and most commercial, institutional and/or industrial waste is sent to Class 1 landfills.
Comingled recycling	Where different recyclable materials are collected and mingled together in one bin or truck. Comingled recycling requires later sorting to separate the different materials.
Container-to-container recycling	Refers to packaging that is collected and recycled, then used to manufacture the same type of packaging to create a circular 'closed-loop' system. Includes 'bottle-to-bottle' recycling.
Container return scheme (CRS)	A resource recovery scheme that incentivises people to return empty beverage containers for recycling or refilling in exchange for a refundable deposit. A CRS is synonymous with a deposit return scheme (DRS) (Europe) and container deposit scheme (CDS) (USA and Australia).
Container return facility (CRF)	Where consumers and businesses can return eligible beverage containers to redeem their container and receive the refund. These are typically retailers (either through an automated reverse vending machine or 'over-the-counter') or larger depots.
Contamination	The incorrect, or excessively dirty, material placed in recycling and food-scrap collections. Contamination may also occur if the method of collection means one recyclable material cannot be efficiently sorted from another (eg, broken glass contaminating paper and cardboard).
Deposit	The refundable amount of money added to the normal price of a beverage. Consumers receive the deposit back when they return the empty beverage container to a CRS collection point for recycling.



Term	Definition
Downcycling	Refers to using recovered materials to make other products that are less recyclable at end of life. Downcycling often leads to a less circular, linear, material flow through the system.
Dry recycling	Refers to the collection of common recyclable packaging materials, such as glass, steel, aluminium, some plastics, paper and cardboard.
Emissions	Greenhouse gas emissions, especially carbon dioxide and methane, released into the atmosphere, where they trap heat or radiation. Most waste-related emissions are biogenic methane emissions, generated when organic materials, such as food scraps, paper, wood and sewage sludge, break down in the absence of oxygen.
End of life	The end of a product's useful life (eg, when it is unable to be repaired or reused).
Food scraps	Includes edible and inedible discarded scraps from food and food preparation. For example, onion skins, peel, meat and bones, half eaten, mouldy or expired food. 'Food-scrap collections' refers to the collection of food scraps from a dedicated bin alongside kerbside rubbish and recycling collections.
Garden waste and green waste	Excess plant material from garden activities. For example, lawn clippings, vegetable garden waste, and flower and shrub trimmings (generally does not include larger woody material requiring a saw).
Hard to recycle	Materials or packaging products with limited markets for recycling and/or that are technically difficult to recycle. Where recycling is possible, they represent low economic value for recycling purposes.
Inorganic recyclable materials	Materials collected for recycling that are not of biological origin, such as glass, plastic and aluminium.
Interim regulatory impact statement	Initial analysis by the Ministry for the Environment of the options being consulted on. It includes a consideration of the costs and benefits of a proposal as well as its impact on different stakeholders. A final regulatory impact statement, informed by the consultation, will accompany final policy proposals.
Kerbside collections	Collections of rubbish, recycling, food scraps or another specified material placed at the edge of the footpath (side of the kerb) for collection.
Kerbside recycling	Recycling placed at the kerbside for collection. Household kerbside recycling refers to recycling from households, which is often a council-provided service.
Linear economy	Our current single-use or 'one-way' economic system of taking resources, making products and disposing of them.
Liquid paperboard (LPB)	LPB cartons are a composite, multilayer material made from a combination of fibre (cardboard), plastic and aluminium. These materials are not easily separated for recycling.
Long term Plan (LTP)	The Long-term Plan (LTP) is the key planning tool for councils. LTPs outline all things a council does and how they fit together. They show

Term	Definition
	what will be done over the 10-year period covered by the LTP, why the council is doing things and their costs.
Material recovery facilities (MRF)	Facilities where recycling is sorted into saleable commodities. Most recycling collected at kerbside will be sent to an MRF to be sorted before being on-sold to be recycled into new materials and products.
The Ministry	Ministry for the Environment.
NZ CRS	New Zealand Container Return Scheme.
Organic waste	Waste made from materials of biological origin including food scraps, garden waste, paper, timber, plant-based fabrics, and sewage sludge.
Organics recycling/organic waste collections	The collection of food and/or garden waste for recycling (processing back into a useful resource – eg, compost). ‘Organics recycling’ may be used in place of terms such as ‘wet recycling’ or ‘food-scrap collections’. Although paper, cardboard, timber and plant-based fabrics are also organic waste, they are not the target of organics recycling or organic waste collections.
On the go	Refers to the ‘on-the-go’ or ‘away from home’ consumption and/or disposal of products (and their packaging) outside of the household, such as in public places and commercial establishments (eg, cafes, restaurants, bars).
Producers	The manufacturers, brand owners and importers of a product.
Product stewardship	When people and businesses take responsibility for the life-cycle impacts of products, either voluntarily or in response to regulations.
Product stewardship schemes	An accredited voluntary or regulated scheme in accordance with <a href="#">Part 2 of the Waste Minimisation Act 2008</a> . Refer to the Act and the Ministry’s website for detail on regulated and voluntary product stewardship schemes.
Recovery	Refers to both the extraction of materials or energy from waste or diverted material (or ‘recovered materials’) for further reuse or reprocessing, includes making waste or diverted material into compost.
Recovery rate	The proportion of materials recovered (or captured or diverted) from the waste stream for recycling or reuse. See also ‘return rate’.
Recyclable	Existing collection, sorting and reprocessing systems with end markets in place. Reasons that packaging may be unrecyclable include size, shape, colour and the materials used.
Recycling	The reprocessing of unwanted or used materials to produce new materials. May also refer to a noun (eg, ‘putting your recycling out’).
Recycling stream	Materials collected for recycling (as opposed to materials sent to landfill).
Return rate	The rate of eligible beverage containers that are returned and recovered specifically through a container return scheme.

Term	Definition
Reusable and refillable beverage containers	Beverage containers that are intended for multi-use and refilling and have an established return and refillables scheme.
Single-use beverage containers	Beverage containers designed for the purpose of casing a beverage product for one use only – that is, not designed for refilling with the product.
Soil amendment products	Products for improving soil structure or fertility, such as compost and digestate produced by composting and anaerobic digestion of organic materials.
Waste Advisory Board	Established under <a href="#">Part 7 of the Waste Minimisation Act 2008</a> and provides independent advice to the Minister for the Environment on matters relating to the Waste Minimisation Act 2008 and waste minimisation.
Waste hierarchy	A pyramid framework ranking the preferred order of waste disposal, with preventing and reducing waste at the top, and sending to landfill at the bottom.
<a href="#">Waste Minimisation Act 2008</a> (WMA)	The Act encourages a reduction in the amount of waste generated and disposed of in Aotearoa New Zealand.