

# Submission

Transforming Recycling

March 2022

## TRANSFORMING RECYCLING

**By:** Waipā District Council

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# Transforming Recycling

**Submission By: Waipa District Council**

## ***Introduction***

Waipa District Council (Council) welcomes the opportunity to provide comment on the three proposals to transform recycling in Aotearoa New Zealand.

Overall comments : Labelling for any proposed CRS scheme and for national standardisation of dry recycling needs to be clearer and larger than what is currently used. It's very hard to find and then read the plastic type number on many items and some items have no plastic type printed on them at all making it impossible to know if an item is recyclable or not. Waipā District Council encourages the Government to improve and standardise labelling on all packaging at the same time as progressing these proposals.

## PART 1 - COMMENTS ON NZ CONTAINER RETURN SCHEME

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- 1 Do you agree with the proposed definition of a beverage?
- “For the purposes of this 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.”*
- Yes, Waipā District Council agrees.
- 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 of an eligible beverage container would mean that open beverage containers such as cups and coffee cups, and non-beverage containers (e.g. ice cream tubs) are out of scope and would not be included in the scheme.”*
- Yes, Waipā District Council agrees.
- 3 Do you support the proposed refund amount of 20 cents?
- Yes, Waipā District Council agrees and would like to see the deposit reflect the value of the product, higher for less valuable recyclable materials to cover the true cost of responsibly recycling it, in line with eco-modulation. *“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”.*
- 4 How would you like to receive your refunds for containers?
- Waipā District Council notes the need to be aware of an aging population who are not inclined/confident to use apps, especially those linked to their bank accounts. It would be great to ensure the “donations” is one of the final options to allow some direct flow of funds from CRS to benefit hardworking community groups.
- First: access to all options (except for “vouchers”) is the preference as it allows the community to choose how they get their refunds back.
- 2<sup>nd</sup>: cash
- 3<sup>rd</sup>: electronic funds transfer (e.g., through a scheme account or mobile phone app)
- 4<sup>th</sup>: donations to local community organisations/charities
- Not needed: vouchers (for cash or equivalent value product purchase).
- The method might be linked to where the deposit is redeemed.
- 5 Do you support the inclusion of variable scheme fees to incentivise more recyclable packaging and, in the future, reusable packaging?
- “In the context of the NZ CRS legislation, we propose that the scheme fees would be eco-modulated to reflect the actual end-of-life management costs to recycle all beverage containers, plus the associated environmental costs. The scheme fees would be modulated based on criteria linked to*

*the waste hierarchy and/or modulated through specific scheme recycling targets to be developed alongside other scheme regulations. The modulation would encourage more sustainable product design and incentivise recyclable and, in the future, reusable packaging.”*

Yes, Waipā District Council agrees with variable scheme fees and supports any other policy measure or financial incentive/disincentive that will drive product packaging choices to what can more easily and cost efficiently be recycled, and preferably recycled in NZ.

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

No, see Q7 for more information.

6 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.

Waipā District Council agrees with these three materials to be included in the CRS:

- glass
- plastic (PET, HDPE, PP, and recyclable bio-based HDPE and PET)
- metal (e.g., aluminium and non-ferrous metals such as steel, tinplate and bimetals)

Waipā District Council requests the Ministry relook at liquid paperboard and consider other options (ban or mandatory product stewardship), as liquid paperboard is proposed within same consultation to be **excluded** from kerbside recycling because of (table 4, page 72):

- lack of sustainable end markets
- no viable & cost-effective processing and sorting technologies
- the inability for it to be safely processed at both manual and automatic facilities around NZ

Those are all very valid reasons that remain true for the product no matter how it is collected (kerbside or CRS). Councils main concern is the consumer (via CRS) or the ratepayer (via council rates) having to deal with the costs of recycling a mixed material. Liquid paperboard cartons *“are hard to recycle as the container is a composite, multilayer material made from a combination of fibre (cardboard), plastic and aluminium. These materials are not easily separated for recycling”* (this consultation, page 115). Often, they come with a hard plastic spout which needs to be dealt with as well.

The Ministry is encouraged to use the waste hierarchy and first **rethink** if liquid paperboard is a packaging product that fits within their stated vision from the draft [NZ Waste Strategy](#) “A circular economy for Aotearoa New Zealand in 2050 | He ōhanga āmiomio mō Aotearoa hei te tau 2050” with its lack of market and useability of the products once separated. Priority 4 of stage 1 of the Draft NZ Waste Strategy is to

*“Get resource recovery and recycling systems working well...We propose the following as headline actions.*

*Simplify material streams for reprocessing:*

- *continue phasing out hard-to-recycle and low-value materials, with an initial focus on plastics*
- *consider incentives to manufacture in ways that make recycling easier, for example through less mixing of materials and easy dismantling....”* (page 34).

The Ministry took bold steps in 2020 of banning plastics #3 and #6 from food packaging through consultation on [Reducing the impact of plastic on our environment](#) (2020). This decision was based on a robust analysis of the material itself, its recyclability, markets, cost to recycle, whether

alternative products available, and a cost and benefit analysis. It is requested the Ministry assess liquid paperboard through the same process **before** considering inclusion in the CRS as many of the benefits listed in the analysis of the costs and benefits of banning plastic #3 and #6 are likely to be the same for liquid paperboard, for example copied from table 6. Page 42 [Reducing the impact of plastic on our environment](#) (2020).

Affected parties	Benefit	Impact
The environment	Higher recyclability of the plastic packaging waste stream, which will likely reduce waste to landfill More effective resource recovery and potentially more recycling may reduce reliance on raw materials.	High
Retailers	Positive PR – ‘doing the right thing’. The same rules for all mean no one is disadvantaged. Easier for retailers to influence packaging decisions through their supply chains.	Low-medium benefit
Food outlets (takeaways, cafes, restaurants)	Positive PR – seen as doing ‘the right thing’ – potential increase in customer satisfaction	Low cost
Local government	Better waste management including less contamination in kerbside recycling. Cost saving from diverting materials from landfill, due to higher overall recyclability.	Medium benefit
Government	Will help New Zealand meet international obligations for sustainable trade and a circular economy.	Medium cost
Waste industry (recyclers and re-processors)	Less hard-to-recycle plastic in the system will reduce cost for recyclers and improve the efficacy of collecting, sorting and recycling high-value plastic	High benefit

The costs to brand owner, importers and suppliers of packaging and packaging manufacturers would be significant, but as that is all the same international company that brings liquid paperboard to NZ, the impact on a range of businesses and companies is more limited.

There are several other desired outcomes in [Reducing the impact of plastic on our environment](#) (2020) that could be applied to liquid paperboard as well, for example:

*“Most of the PVC and polystyrene items proposed for phase-out have viable replacements. Where plastic packaging is in use, **we want to encourage a shift towards higher-value and recyclable materials.** For example, clear or natural plastics: PET, HDPE and PP.” (page 39)*

*“The proposed phase-out will help to do away with packaging **that cannot be recovered or recycled because it is uneconomic and there are few markets.**” (Page 40)*

*“Transitioning to PET, HDPE or PP containers will (in most cases) reduce environmental impact, as these **plastics are more likely to be recycled for use again.**” (Page 40)*

*“reduce confusion for retailers and brand owners, by removing some of the **hard-to-recycle and harmful materials** from the system, making it easier for them to invest in more sustainable materials.” (Page 45)*

If a ban is not assessed to be the best outcome for NZs circular economy future, as there is only one producer of liquid paper board, Tetra Pak, doesn’t it make sense that they manage their own

product completely under a mandatory product stewardship scheme? As they have not created a widespread, accessible recycling collection under a voluntary setting.

Other concerns about the proposal to including it in the CRS scheme of particular concern to council is confusion of the public. The CRS will be promoted as 'recycling' so it is likely many people would probably try to add it into their kerbside recycling, as "its recyclable, isn't it? I recycle it for my deposit back". Having consistency of messaging around recycling is key to reduce contamination and resultant costs to council. Also this document acknowledges "harder to recycle packaging such as liquid paperboard (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 New Zealand" (page 38), so having a material that is not actually being recycled but downcycled within the CRS does weaken the recycling message to the community.

Having only one planned factory (owned and operated by the producer of the product) would then result in a monopoly where the producer of the packaging can set unrealistically low contamination thresholds, (like recyclers and councils are experiencing now with only one glass recycler in NZ) so they can reject as many loads as they like as the transportation costs and alternate arrangements for the material falls back on the recyclers and councils. There would need to be several factories under different ownership to create a fair market transaction environment.

LPB is a small part of the beverage packing industry, its recyclability outcomes are poor in comparison to other products, ideally the preferred option is to get these drinks into more recyclable packaging that doesn't need to be propped up via higher fees, via eco-modulation to be recycled/downcycled. If it is to be included the eco-modulation needs to realistically cover the much higher costs to recycle this material.

- 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?

Yes, Waipā District Council agrees, with the key consideration that it doesn't create confusion and resultant contamination with kerbside recycling; messaging must be consistent.

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

Yes, Waipā District Council agrees. The "Rethinking Rubbish and Recycling" report by WasteMINZ shows that only 3.26% of all rubbish was plastic containers (page 13, table 3.1). And of those plastic containers, #2 dairy bottlers made up just 6.47% (page 18, table 4.2). So, of all kerbside rubbish only 0.21% is milk or dairy bottles, meaning they have a high return rate through kerbside recycling. Waipā District Council supports lessening the burden on families buying milk as a staple food by not including it in the CRS.

Council would like to see the dairy industry take responsibility for the cost of their products at end of life and they should contribute to the costs for councils to continue to collect and recycle them or they participate in a mandatory product stewardship scheme.

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

Yes, Waipā District Council supports this. We encourage the Ministry to look at the example of a local company here in the Waipā, [Kaipaki Dairies](#) who provide milk in an 18L keg for hospitality

sites, which through plumbing in via the fridge, is tapped for use. The kegs are collected, washed, refilled and sent out to cafes, again and again. This means cafes have zero dairy based waste or recycling and are operating in a higher level of the circular economy.

- 11 Do you support the Ministry investigating the option of declaring fresh milk beverage containers made from plastic (e.g., plastic milk bottles and liquid paperboard containers) a priority product and thereby including them within another product-stewardship scheme?

Yes, Waipā District Council agrees a separate scheme would be preferable. And through the product stewardship scheme Waipā District Council supports simplifying the products allowed to be chosen by companies and manufactures. Triple skin milk bottles are not as easy or valuable to recycle so the translucent HDPE bottles should be incentivised as the only choice as a packaging product for dairy, or eco modulation is applied at a higher rate for triple skin to cover its lower commodity price.

- 12 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?

Yes, Waipā District Council agrees. It would be a negative overall outcome if a reusable container was used like a single use container. Return/refillables schemes typically have their own deposit scheme in operation which is much more aligned to the true cost of the container (e.g. glass milk bottles are often \$3 each at the outset) and they should have a recyclable outcome for end of life for their refillable containers.

- 13 Should there be a requirement for the proposed NZ CRS to support the New Zealand refillables market (e.g., a refillable target)?

That would be a preferable target for the NZ Waste Strategy rather than a container return scheme. For simplicity the CRS targets should be about returned containers.

- 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?

Waipā District Council suggest the Government play a key role in supporting and funding refillable infrastructure development e.g., regional washing plants. This network would be key to allow companies to consider switching to refillable products as it would minimise the cost and time to transport to the wash plant.

Government could run an educational campaign about why it's good to choose refillables (for consumers and companies).

MfE could fund a set amount per café/restaurant to cover the plumbing work and fridge upgrade to any businesses that are able to access reusable kegs of milk as discussed in question ten. That would remove that barrier of cost to businesses who are willing to make a change into a circular economy/no waste model and normalise refilling. The fund should require a low time investment to apply and report on. Another arm of this would be to incentivise smaller local milk providers to move away from milk pouches (non-recyclable, non-valuable soft plastic) to a washable keg-based system to ensure more businesses across New Zealand are able to access this system.

- 15 Are there any other beverage packaging types or products that should be considered for exemption?  
No.
- 16 Do you agree that the size of eligible beverage containers would be 3 litres and smaller?  
Yes, Waipā District Council agrees as only 1 per cent of supermarket sales are sized 3 litres or over. Companies producing larger sized containers could run regional collection events or do reverse courtering to gather back their products for recycling as part of product stewardship.
- 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?  
Waipā District Council thinks the CRS rule on lids needs to be consistent with the outcome of standardisation of recycling (this is the priority scheme) in order to not confuse the community on what is recyclable. Ideally there would be the same rules for each recycling scheme. "Lids off" does encourage users of CRS to wash/tip out remainder of liquids.
- 18 Do you agree that the scheme should provide alternative means to capture and recycle beverage container lids that cannot be put back on the container? If so, how should they be collected?  
Waipā District Council thinks again that consistency of messaging is key. If lids are to be collected it has to be a separate (ideally community run) scheme as we acknowledge the lost resources if lids are not able to be recycled at all.
- 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?  
Yes, Waipā District Council agrees with the proposed model based on MfE's geo-spatial analysis that says that 95% of New Zealanders live within 10km (and 90 per cent live within a 10-minute drive) of a supermarket which would be a return location. Waipā District Council also supports the approved voluntary sites in any areas with access deprivation, to ensure the CRS has good access for all, especially rural communities.
- 20 Where would you find it easiest to return eligible beverage containers? Please select all that are relevant and rank these from most preferred.  
Waipā District Council agrees with the preference being based round ease and convenience to increase participation from the community and not adding extra trips to their day or week.
1. supermarket
  2. local retail outlet that sells beverages (e.g., dairy, convenience store, bottle shop, petrol station) – Note - if local retail outlets cannot take some items due to hygiene reasons that adds unnecessary complications to the scheme. Ideal system is the same items accepted at every return point for the same refund
  3. community recycling/resource recovery centre - note many councils and communities do not have these currently
  4. other community centres/hubs (e.g., town hall, sports club, etc)
  5. shopping centre/mall – please add big box retail, retail parks etc, they are large, have lots of shops and space.

6. commercial recycling facility (e.g., depot, more likely to be located in industrial zone)
7. waste transfer station

Waipā District Council would like to see the time taken to support and enable community groups to participate in the scheme for example, assisting community organisations through the process to become a collection point. Raising the need to consider these groups not currently in the waste industry will need more time to get prepared (and perhaps) funding, so allowing for that in preference over purely commercial operations for bulk return sites. Also ensuring that all costs for community to participate as collectors are covered for example costs that might not be considered in the set up phase are: fencing, security, signage, marketing and promotion, site lease/rent. And ongoing costs could be graffiti removal, contamination, damage, etc.

Another idea to share the benefit of the CRS with the community is to have CRS designed and funded trailers that are designed for bottle drives, that councils could loan out to local not for profit groups to borrow for a weekend to do a clean-up and bottle drive as a fundraiser.

- 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?

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

Waipā District Council agrees, based off MfE access modelling, we support mandating involvement for return-to-retail for premise over 300m<sup>2</sup> (many retailers, dairies, petrol stations and smaller supermarkets likely exempt).

Many small return spots seems like a lot of duplicated administration and effort on the collection front when 90+% of people are within 10 minutes' drive or 10km of a supermarket.

- 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?

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

Waipā District Council agrees that to enable good access for the rural community a smaller size should be allowed in rural areas or villages. This would need more investigation and might need to be on a case-by-case basis, as in some locations the Community Hall or local school might be the central place and one of the largest facilities to house a return location.

- 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).

Waipā District Council think the biggest reason for exemption should be scheme efficiency. For example, there maybe two supermarkets very close by, so it would suggest only one site is needed. A framework for exemptions needs to be developed for fairness.

- 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 CRS. This ensures that beverage producers are not incentivised towards lower return rates. Most of the best-performing schemes globally (e.g. European schemes) use a deposit financial model."*

Yes, Waipā District Council agrees with the proposed deposit financial model to incentivise companies to support the return message.

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

Yes, Waipā District Council agrees with the caveat the there is significant community representation on the board to bring through opportunities for the community to benefit from and participate in the CRS.

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?

Yes, Waipā District Council agrees.

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?

Yes, Waipā District Council agrees.

28 Do you support the implementation of a container return scheme for New Zealand?

Yes, Waipā District Council agrees.

~~29 If you do not support or are undecided about a CRS, would you support implementation of a scheme if any of the key scheme design criteria were different? (e.g., the deposit amount, scope of containers, network design, governance model, scheme financial model, etc). Please explain.~~

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

It would be good to ensure councils continue to be engaged in the development of this programme as there is a possibility of unintended consequences of poisoning or lessening the perceived benefits of kerbside collection. For example, in the communication plan, it would be great to explain the council contractor will recoup the deposit on all containers that come through kerbside and that will be redirected to pay for the contract, thus keeping Council rates low.

Would like to know more about the fact stated on page 28 *“Overall, a NZ CRS would complement kerbside recycling by providing local government (and/or recyclers) an estimated \$50 million in benefits annually by:*

- *reducing volumes managed at kerbside (reducing costs)”*

It doesn't seem to be immediately evident how Council's recycling contracts will be cheaper? The costs are in the trucks, the staff, diesel so if we are collecting mostly full bins, the cost is the same if those same bins are three quarter full (or less) post CRS.

Council is keen to get agreement from the Ministry that in promoting CRS, it won't subtly dissuade the community from using kerbside collections. As councils rely on the higher value materials and soon the deposit to offset contract costs from the lower volume of materials we will still collect. Changing the frequency of collection would be a big deal for the community and would take a year or more of auditing to assess if a longer duration between collections were feasible for the community once CRS is in place and probably community consultation (our glass is currently monthly and mixed recycling every two weeks). So, it seems our costs will remain mostly high, even if we get less material per collection.

## **PART 2 - COMMENTS ON IMPROVEMENTS TO HOUSEHOLD KERBSIDE RECYCLING**

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One key benefit not listed on page 65 is councils will benefit from nationally delivered communication on what can and can't be recycled. The possibility of a fund that all councils contribute to per capita, matched by the Ministry would be ideal to have regular TV ads and a programme of all other communication channels that would take that burden of local councils, especially small ones, and ones with hard-to-reach communities, to have the same message delivered without council having to design it all and pay for it. Having one website, one place for all knowledge, that every council doesn't have to update, we can just link to one place will save time and effort.

Waipā District Council encourages the Government to increase support to Love Food Hate Waste as a primary source to reduce household waste at the outset by shopping to a list, buying less, menu planning etc and using the food we have with their recipe generator. Reducing food wastage in our homes has many benefits and should be emphasised before and alongside any future food waste kerbside collection. There is much benefit if this work was developed into a national education programme that is adequately funded.

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

Yes, Waipā District Council agrees. There will be costs to councils to change all their collateral and to educate about the change, so consideration from Central Government to help cover these costs would be valuable. Waipā has an imprinted bin lid with some items that are proposed to be excluded, so ideally, we would need to add a couple of stickers to 22,000 wheelie bins, ahead of the truck, which starts collecting at 7am. Getting around our district to every bin is always a costly exercise, last time Council delivered calendars it cost over \$30,000.

Standardisation of recycling will give clarity to contractors of what to expect in future contracts.

- 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?

Yes, 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.

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

Regulation is required. If the two councils who current collect liquid paper board were willing to change, they would have done so (or committed to) in the past few years. Many of the councils who still collect plastics 3,4, 6, & 7 have publicly told their communities it is being landfilled, so if they were willing to stop collecting them, it would have happened. There could be significant contractual implications to change what is "accepted" for recycling council to council, and some cost implications, so perhaps councils need help to work through these issues?

Waipā District Council is already very closely aligned to the proposed list of items and is willing to make the final changes to align. That would mean communicating a few items that are proposed not to be collected anymore (aerosols, tinfoil, aluminium trays) and some new clarifications (no

lids, no items smaller than 55mm). To be able to embed that next change to the service (often perceived as a reduction in service by our community) within a national message outlining the benefits of national recycling standardisation would be helpful. To date our communication channels have been consumed with many important recycling messages during the past three years (whole new service, stop collecting plastics 3, 4, 6, & 7, starting bin auditing, medical waste, contamination, COVID-19 service disruptions etc), so we have not found the capacity to complete the alignment, but will do so if this list become the national standard.

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 (lids messaging to be the same as CRS)
- ✓ paper and cardboard
- ✓ **empty** pizza boxes
- ✓ steel and aluminium tins and cans
- ✓ plastic bottles 1 (PET) and 2 (HDPE) [would “#1 #2 & #5 plastics containers, bottles and trays” cover these last three lines and be simpler messaging?]
- ✓ plastic containers and trays 1 (PET) and 2 (HDPE)
- ✓ plastic containers 5 (PP)

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

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

None.

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

Waipā District Council is not against regular reviews, but there needs to be key criteria based around recyclability (market, sorting, use etc) and whether recyclability of the new product would be better served via being in the CRS or under product stewardship. These both allow the cost of the recyclability to be covered by the manufacturers and producers. There would need to be overwhelming evidence to add a new products to council collections.

38 What should be considered when determining whether a class of materials should be accepted at kerbside in the future? (Tick all that apply)

Waipā District Council feel this question is best answered by re-processors and recycling contractors, but the below points are a good start. Being conscious that affordability/acceptance of cost to recycle an item/material for ratepayers is different that an item being able to be recycled somewhere, somehow, at some cost. Also ensuring that the principals of the waste hierarchy is applied to any prospective new class of material.

- ✓ sustainable end markets
- ✓ end markets solutions are circular and minimise environmental harm
- ✓ viable processing technologies
- ✓ processing by both automated and manual material recovery facilities
- ✓ no adverse effects on local authorities, including financial
- ✓ supply chains contribute appropriately to recovery and end-of-life solutions for their products

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

Waipā District Council prefers an independent board, made up from recycling re-processors, recycling contractors and local government as these are the players who primarily handle what becomes 'recycling' after it's been packaged. Concern about industry making these decisions (or being a large part of a board who makes the decision) is that is likely to result in products being put into the market that are hard to recycle, which is the current situation, that is not providing good recycling outcomes.

40 Do you agree that, in addition to these kerbside policies, 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.

Waipā District Council, agrees. With the caveat of the cost for infrastructure, collection methodology, transport and responsible end of life recycling is covered by the brand/manufacture/producer/retailer, rather than council or community. Ideally these items (especially larger items) should be within a mandatory product stewardship scheme.

## **PROPOSAL 2: ALL URBAN POPULATIONS SHOULD HAVE ACCESS TO KERBSIDE FOOD SCRAPS COLLECTIONS**

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Preference moving forward would be for MfE to refer to food waste processing as composting instead of recycling. This use of the same word for dry recycling materials could create confusion for the community and result in contamination. For example

*"Because of the high number of new processing facilities required and the likely ambition of emissions reductions targets, it is timely to also consider whether businesses should be required to separate food waste for recycling composting."* This would support the huge effort councils are putting in to reduce contamination in recycling services.

Waipā District Council would like to raise the lack of policy direction/alignment on in-sink water-borne waste disposal units in regards to food waste collection services. Can the Ministry for the Environment work with the Ministry of Business, Innovation and Employment look at the NZ Building Code with the goal to align it with the future policy direction as proposed in this consultation. For example, if in the future, most urban houses will have access to kerbside food waste collection services, should in-sink waste-borne disposal units to be banned to maximise capture of food scraps by council services?

Waipā District Council would like to raise the concerns of housing density. Denser housing creates challenges for collection vehicles. Bespoke or smaller collection vehicles increases contract costs to Councils and ratepayers.

Waipā District Council encourages the Government to allow Councils the time to design and do a great job with any future new services. Allowing time for lessons to be learnt from Councils doing food waste collection, and integrating that into a tailored plan for our communities is key for our council relationships and ultimately use and participation in the service by our community.

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

Waipā District Council agrees. Diversion should be expanded to include “...from landfills, incineration and pyrolysis”.

‘Urban’ needs to be clearly defined and ideally aligned with each council’s district plans to allow a clear and defensible boundary and a way to apply a new rated charge.

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

Waipā District Council agrees with the absolute caveat that councils need support to achieve the Government’s carbon reduction and waste diversion goals via kerbside food waste collections. The capital expenditure on trucks and bins at the outset and the ongoing operational expenditure of running the service both need central government support to make this new service acceptable to rate payers and to reduce the rates burden.

Also it needs to be clear that this is just for urban properties, even if there is current recycling for rural customers. Servicing rural communities adds a significant cost and needs to be considered more carefully.

43 Do you agree that these collections should be mandatory in urban areas (defined as towns with a population of 1000 plus) and in any smaller settlements where there are existing kerbside collections?

Waipā District Council agrees.

44 Do you think councils should play a role in increasing the diversion of household garden waste from landfills? If so, what are the most effective ways for councils to divert garden waste?

- Offering a subsidised user-pays green waste bin? Are there considerations for being in direct competition with the private market and making that unfair because of using levy, rates, or tax funding to subsidise?
- Making it more affordable for people to drop-off green waste at transfer stations. Waipā does not own any transfer stations, so this is not an option for our council.
- Promoting low-waste gardens (e.g., promoting evergreen trees over deciduous)? No issue with educational campaigns but they typically result in low uptake (the willing only).
- Other (please specify)?

Establishing pre-paid/set number of rated rubbish bags per year and/or limiting rubbish wheelie bins to 120 L or smaller would drive down the percentage of green garden waste. Our solid waste audits have found the bigger the receptacle the more green waste ends up in it. In the Waipā District there is no council organics service but there are many private green waste companies in operation and our recent solid waste audits shows a huge difference where there is a smaller bin size, or even more drastically, where there is a user pays element to rubbish collection. The waste companies have confirmed “hardly any” of their 240L wheelie bin customers are monthly, but even if they were, it’s still a massive difference.

Rubbish collection type	% of garden waste by weight	Kgs of garden waste per set out
Pre-paid bags	1.4%	0.12kg
120L rubbish wheelie bin	20.2%	2.5kg

Rubbish collection type	% of garden waste by weight	Kgs of garden waste per set out
240L rubbish wheelie bin	22.9%	4.92kg

As mentioned above there are many small local businesses in the garden waste collection business. So mandating garden waste to be a council service would likely make many of their businesses defunct and that is not a desirable outcome for the local economy. The provision of Government supported infrastructure that was accessible (time and cost wise) would be hugely beneficial to householders to drop off their green waste directly whilst also supporting the small, established green waste businesses to thrive and compete, offering lower cost services to the community if infrastructure options were increased.

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

Waipā District Council agrees on a phased approach but not the timeframes proposed as covered in Q46.

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

No, Waipā District Council does not agree. That is not enough time. Based on having recently done a new service roll out of wheelie bins for recycling, it a huge task for a small council and adds workload to many council teams for example: customer services, communications, rates, IT, GIS and often has jobs that need a long lead in, for example adding new modules to the customer call platform. This resourcing need is over and above the waste and contract staff who would lead the project. Here is a general indication of times needed for key tasks to roll out a new service:

1. Contract preparation & tendering (16 months).
2. Procuring & manufacturing the bins and trucks (12 months).

**Note:** likely to be bin manufacture and truck procurement delay if many councils try to launch a new service by 2025

3. Working with the contractor to establish routes etc and plan and complete bin delivery (6 months).

**Note:** also, there is a shortage of experienced logistics companies who can handle roll outs of this scale so that is another bottle neck.

4. The communication collateral development and then communication programme to our communities prior to service starting 6-8 months.

Even this small sample of tasks would exceed the time left between such time as Cabinet decides on this proposal and 2025. Some of these can be done concurrently e.g., task 3 & 4 but we can't procure and start manufacture of bins until the tender is complete. And working concurrently assumes high level of staff capacity. One solution is the Ministry funds several contractors to each council in the target area to run this new service roll out project (1 X contract expert, 1 x communications expert, 1 X waste expert and at bin delivery time extra customer service support) OR a larger multi skilled team that does that for several neighbouring councils at one time. The proposal mentions increased Levy payments to councils, but there is no way to predict what they will be at this time, as the Waste Strategy is still not finalised where the proportion and

methodology of councils receiving levy funding is still to be determined. Waipā District Council has only just recently received the first increased levy payment, so we are operating in the status quo funding environment and need surety on when we could grow our team or fund enough contractors to deal with a roll out of a new service.

The time frame needs to be more realistic for many of the smaller councils like Waipā that has one 0.8 FTE capacity that works on a range of issues like developing feedback for consultations like this, administering a community grant scheme, directly delivering waste minimisation education to the community and developing and delivering the recycling contamination education programme. There is not capacity to take on such a large project in a very short time frame.

The above list of tasks and timelines does not take into consideration any consultation with the community on wanting a new food waste service, proposed composting methodology and resulting cost differences, and what the service will cost per household. Genuine community consultation takes time. Perhaps this will be moot if its legislatively required?

Councils also need more time to signal resultant rates increase to our communities and bring the cost into rates calculations through critical planning processes like the Long-Term Plan and resultant annual plans.

Again, raising central government funding support for on-going operational expenditure would make this easier to get the community onboard with.

Recent MfE webinar it was stated MfE wanted to do research on councils who are operating food waste services on participation rates, what foods are placed in (which aren't = lost capture), best practice in NZ. This needs to be done prior to this very short timeline so any of the new services generated through this policy change can benefit from increased knowledge of food waste kerbside collections and develop their services based off NZ data.

Waipā District Council would like to raise the risk of just going with the existing facilities due to Government timeline removes the opportunity to investigate local composting options, as once a contract is struck it is hard and costly to change. There is desire from elected members to investigate the feasibility of developing local composting options, but yet again, being conscious of cost to rate payers to build own facility considering population size.

47 Do you agree that councils without existing infrastructure should have until 2030 to deliver food scraps collections?

Yes, Waipā District Council agrees that's enough time, with the caveat of Ministry composting infrastructure development is well ahead of service roll out.

We propose to exclude the following non-food products and any packaging from any kerbside collection bins used to divert food scraps and/or green waste from landfills:

- kitchen paper towels / hand towels / serviettes
- newspaper and shredded paper
- food-soiled cardboard containers (e.g., pizza boxes)
- cardboard and egg cartons
- compostable plastic products and packaging
- compostable fibre products and packaging
- tea bags

Waipā District Council agrees with the excluded list (above), and to keep the rules as simple as possible. For example, “Tea bags with compostable liners are ok” will not work, that is too much hassle and knowledge needed from the householder to correctly determine what their tea bag is made of.

Animal poop, cat litter, vegetarian pet animal poop and shavings (rabbit, guinea pigs etc) all need to be considered for exclusion.

Overall, similar to recycling, kerbside food waste collection items needs to be standardised nationwide for the same reasons, reducing contamination, increasing community understanding etc.

48 Compostable bin liners

Waipā District Council thinks bin liners needs more research before being excluded. If using these in addition to providing a kitchen caddy increases usage of the service and volume of food scraps diverted; a more developed policy decision needs to be reached. Of course, the liner must be compostable by any methodology.

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

Waipā District Council feels this is best answered by the composting industry as they know best what protects the end market for the compost.

50 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.

- ✓ products help divert food waste from landfills
- ✓ products meet New Zealand standards for composability
- ✓ 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
- ✓ producers and users of the products and packaging contribute to the cost of collecting and processing

Waipā District Council agrees with these points yet feels this is a question best directed to those making, selling and purchasing compost, to ensure what is collected retains/improves and develops the market for the end product to ensure the closed loop.

- ✓ a technology or process is available to easily identify and sort compostable from non-compostable products

There are issues with community understanding of ‘composable’ and no NZ standard currently, so it is recommended to exclude compostable until standardisation on labelling and standards is completed.

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

### **PROPOSAL 3: REPORTING ON HOUSEHOLD KERBSIDE COLLECTIONS OFFERED BY THE PRIVATE SECTOR**

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

Waipā District Council agrees.

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?

Waipā District Council agrees. But it needs to be made clear what is private and what is council, so if there is poor private service it doesn't negatively impact councils diversion rates.

54 Do you agree that the information should be published online for transparency?

Waipā District Council agrees.

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

More detail is needed on how/when the 'rates' will be calculated. For example, solid waste audits show exactly how much is placed in the recycling bin that is contamination. But once its collected, compacted in the truck, tipped out and then finally scooped onto the sort line the volume of contamination is much higher.

For any service a good measure is participation rate (number of properties using the service over the number of eligible properties). If using RFID chips this can be pulled from the data. But could also be done by small surveys. To ensure comparison, sampling methodology should be generated and used nationally, like for solid waste audits.

For mixed garden and food waste, they would need to do bin audits where material is weighed rather than visual assessment.

A key measure of success of any organics or recycling service is how much material that should be in the service is still in the rubbish (lost capture). For example, audits of rubbish from areas who offer food waste collection where food in the rubbish is weighed.

End destination of recyclables (overseas or NZ based) would be a good measure to try and move more recycling to be handled in NZ.

### **PROPOSAL 4: SETTING TARGETS (OR PERFORMANCE STANDARDS) FOR COUNCILS**

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

Waipā District Council agrees.

57 Should the minimum performance standard be set at 50 per cent for the diversion of dry recyclables and food scraps?

Waipā District Council disagrees. Waipā District Councils recent solid waste audit showed that 48.6% per cent of our communities' rubbish was food or dry recyclables so we are already shy of 50 per cent diversion even if there was perfect participation by every household for recycling and

a proposed future food waste collection service. Perfect community participation is nearly impossible and that takes a huge amount of local council time, energy, education, intervention, enforcement and undoubtedly more education. And from current food waste collections in NZ none have not been close to getting 100% of food out of the rubbish. Participation rates and set out quantities are much lower than that.

It would be good to have some intermediary goals that are more realistic of where our communities are regarding knowledge, care about and participation in recycling and composting services.

58 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?

No, Waipā District Council believes that is not a realistic timeline to achieve the perfect use of future services.

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?

No, Waipā District Council believes that 70% diversion is not a realistic performance standard. If food and recycling is 100% done **perfectly**, Waipā’s last solid waste audit shows that 56.6% could be diverted. Considering Government plans for e-waste product stewardship to handle “Household hazardous” and “Hazardous other” (this is being generous as this also includes liquid wastes and they are a small % of household waste at 0.8%) there is still a gap of 10.5% to get to 70% diversion.

Without substantial progress on all mandatory product stewardship schemes and new ones started, it is hard to know what supporting systems, infrastructure will be in place to support our community to divert 70% of their waste.

From the recent solid waste audit the waste categories with substantial percentages that would need to have more accessible, affordable services and/or community acceptable, affordable and readily adopted alternative products are:

Nappies and sanitary	12.3%	There are reusable nappies but that is not an easy change for some families (cost probative start up, need a washing machine, worried about water and energy costs etc). There are no known such products for adult incontinence. No Gov commitment to apply mandatory product stewardship as far as staff are aware.
Soft plastics	7.7%	Only available at one supermarket in our district out of six. Cost \$450 (+transport) a tonne to be accepted to be recycled into a fence post. Currently cost prohibitive. No Gov commitment to apply mandatory product stewardship as far as staff are aware.
Organic “other” All other primarily organic items - includes cat tray litter, hair, vacuum cleaner bags.	5.6%	Is this accepted as green waste? It won’t be in proposed food waste service outlined in this document.

Non-recyclable plastics	3.7%	No known options. No Gov commitment to apply mandatory product stewardship/product bans (beyond #3 & #6 which are very small % of plastics) as far as staff are aware.
Non-recyclable paper	3.4%	No known options. No Gov commitment to apply mandatory product stewardship as far as staff are aware.
Rubble and timber	3.0%	No local options for rubble for householders (not accepted at transfer stations). Treated timber, no local diversion infrastructure or services. No Gov commitment to apply mandatory product stewardship as far as staff are aware.
Textiles (not clothing)	2.1%	No known options except rag bins. Only voluntary work happening on product stewardship as far as staff are aware.

Waipā District Council proposed a high-performance target should be around kg of waste/person/year based on solid waste audits. The overall goal should be that kg of waste/person/year flattens out and start to decrease over time. Over the longer term it's a reduction in consumption that should be the goal, not just diverting what is possible once full services, infrastructure and product stewardship is in place.

Waipā District Council also encourages the Government to develop national framework to measure those who are further along in the waste minimisation journey and not engaging much with kerbside services because they are avoiding and minimising waste and also composting at home. So tracking actual habits and behaviours that result in less waste generation and more personal responsibility of their waste would be a good measure to track over time.

60 Some overseas jurisdictions aim for diversion rates of 70 per cent. Should New Zealand aspire to achieve a 70 per cent target?

Waipā District Council would like to know what is diversion rates are actually **achieved** overseas in countries known to lead waste management practises? Analysis of their policy settings, waste levy charges etc would be needed to know if New Zealand has the context to achieve similar goals. If any such ambitious goal is set, it is key to understand where all the diversion services and infrastructure needed are being funded and when, so Councils can understand if this is a realistic goal to aspire to.

61 What should the consequences be for territorial authorities that do not meet minimum performance standards?

Considering the lack of enabling policy (increased waste levy charge, product bans, mandatory product stewardship) or targets for waste diversion from the Ministry until the last few months, having consequences that financially punish councils that have not achieved a relatively high minimum seems the wrong position to take in this first stage. Adding financial burden through stopping levy funding or imposing a penalty will just make it harder to achieve any positive outcomes.

Waipā District Council would encourage the Ministry to work closer with their partners in local government to understand their barriers to achieving or progressing towards diversion target. It has not been a level play field when considering what levy funding councils have received and what infrastructure has been supported via central Government waste levy funding. The metro councils are well serviced in both these channels, regional or remote councils are not. New service

costs for councils with remote or spread-out populations are much more expensive compared to metro's, in addition to a generally larger rates burden for the same reasons. Possibly active mentoring and retaining control of the levy funding by the Ministry to allow its spending in ways that progress councils towards goals could be an option, similar to when the Ministry for Education puts a commissioner in under performing schools.

## **PROPOSAL 5: SHOULD GLASS AND/OR PAPER/CARDBOARD BE COLLECTED IN SEPARATE CONTAINERS?**

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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

Waipā District Council would suggest the numbers presented of 48/67 (72%) councils currently collecting glass separately shows the best direction to pursue to prioritise recycling material quality. Glass collected separately maintains the ability to hand sort mixed recyclables, reduces windblown litter (a common complaint when Waipā collected paper and card to the side of our crate) and degradation of the paper due to weather. Waipā District Council uses a 140L wheeie bin and collects glass monthly which works well for the vast majority of households (capacity is only too small for a very small number [less than five complaints received since starting this service in 2019 from 22,000 rated properties] of households with a large number of adults who drink alcohol in glass who would need to access a transfer station for their excess).

A comment on the consideration of crate, bag or a boxes as possible ways to collect paper and card - none of these are contactless, thus creates risk of non-collection in current (and possible future) health pandemics. Non-collection causes huge community distress during these stressful times and creates a storage issue at households or an increase in landfilling.

Also, manual lifting of crates, bags or a boxes, or kerbside sorting often requires extra staff (a "runner") or a driver who is fit, able and willing to hop in and out to lift and empty or sort the material 1,000+ times a day, summer and winter. Currently there are labour shortages of suitable staff to simply drive heavy vehicles. Past experience with kerbside sort contracts held by Waipā District Council the contractor really struggled to fill those roles due to the physical nature of the job. So, contract costs and labour availability are also a large consideration when thinking about methodology, not just safety.

63 If glass or paper/cardboard is to be collected separately, should implementation:

- Wait until after the CRS has started so Councils know the impact of that scheme to feed into contract negotiation around glass collections.

Waipā District Council encourages the Ministry to keep that in mind when considering allowing the small number of councils to continue to collect glass mixed in with other recyclables, now or post CRS as even 10% of expected glass remaining in kerbside will continue *"to be broken during collection and the fine shards of glass contaminate other recyclables particularly paper/cardboard."* To achieve proposed diversion rates proposed in this consultation, contamination rates need to be exceptionally low, so collecting glass separately needs to be driven by policy.

## **PROPOSAL 6: SHOULD ALL URBAN POPULATIONS HAVE ACCESS TO A KERBSIDE DRY RECYCLING COLLECTION?**

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64 Should all councils offer household kerbside recycling services?

No, Waipā District Council does not agree, without the caveat of “for urban properties” in Q64 and/or “for urban properties in settlements, villages, townships within X km or a service centre”. 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.

65 Should these services be offered at a minimum to all population centres of more than 1,000 people?

Yes, Waipā District Council agrees.

66 Do you agree that councils without any council-funded kerbside recycling collections should implement these collections within two years of their next Waste Management and Minimisation Plan?

Yes, Waipā District Council agrees that councils without any council-funded kerbside recycling collections should implement these collections but not on the stated timeline. It is better to set a reasonable timeframe like “within 4 years” as raised before, two years is not a very long time for Councils to tender, procure, plan, develop a communication plan and roll out a brand-new service. Especially considering those that do not have council funded recycling right now must have some significant challenges to overcome, as they are currently behind best practice. So, a short time frame is not enabling to councils.

~~67 What research, technical support or behaviour change initiatives are needed to support the implementation of this programme of work?~~

## **PART 3 - PROPOSAL: SOURCE SEPARATION OF FOOD WASTE IS PHASED IN FOR ALL BUSINESSES.**

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Raising the need to consider how central Government can support more rural and spread-out communities and businesses to have similar access to organic processing at the same cost. Currently funding of private companies to provide better waste services via MfE’s waste minimisation fund has been really strongly supporting improvements in metro areas only. As the density of feedstock in metro centres always wins out for private business. Waipā District Council encourages the Government to look at policy and funding settings that allow regional areas to participate without undue burden on our local business owners and operators.

Keen to share that in 2011 and 2014 Waipā District Council contacted Waste Not Consulting to do office waste audits. The results are very different compared to the numbers shared in this document of 0.6kg of food waste/staff member/week.

Waipā audit results:

2011 - 0.13kg/staff member/week

2014 - 0.09 kg/staff member/week

Between these two audits pig bins were installed in one or two office locations, but food waste separation was not universal across all sites.

68 Should commercial businesses be expected to divert food waste from landfills as part of reducing their emissions?

Waipā District Council agrees with the caveat that the term “commercial business” be clearly defined first in the document. Perhaps a starting point is:

“Businesses proposed to be mandated to separate their food waste:

- are within 150km of a processing facility
- have a premise for the sole purpose of doing business that has more than 75 people
- are involved in producing or processing or serving or selling fresh food, they should be mandated to participate.”

Otherwise, no, as the category is too broad.

69 Should all commercial businesses be diverting food waste from landfills by 2030?

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.

70 Should separation be phased in, depending on access to suitable processing facilities (e.g., composting or anaerobic digestion)?

Answered above.

71 Should businesses that produce food have a shorter lead-in time than businesses that do not?

Again, infrastructure needs to be in place to enable separation and servicing. If the closest place is too far away that transport costs are prohibitive, that is not enabling.

If it is imagined that councils will collect this food waste under a contract, raising the time needed for council staff to complete due process. If left to the market to provide, often that results in smaller townships not getting offered the service at all or at a much higher cost.

72 Should any businesses be exempt? If so, which ones?

With the lack of data on food waste per business type it is hard to draw a conclusion, but perhaps small businesses (less than 75 full time staffers) who are also low waste generators (under 50kg per week)

The consultation suggests exempting businesses based on the population of the township they are in. This could result in some unintended exemptions, for example a chicken processing plant might be in the middle of nowhere (very low population) yet create lots of food waste, and under this proposal, be exempt.

73 What support should be provided to help businesses reduce their food waste?

Government needs to ensure:

- The composting products made have stable and secure markets and to develop new markets in order to generate commercial need for proposed increased volume of organics diversion
- Equitable access to infrastructure
- Reasonable timelines for councils to tender contracts
- Varied investment in solutions to suit the differing scales of food waste in the commercial space to incentivise composting on site (vermiculture for example). As any time waste is composted on site (or as close as possible) the costs and transport carbons are lower
- Foster connections with those in the commercial food production sector and the agricultural sector to facilitate food that did not make the grade for human consumption, yet is still safe, to be used for animal feed. Promoting this within the food production industry as a good news story and a way to use valuable food products for a positive end use rather than it heading to landfill where it will create detrimental greenhouse gases.



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