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**To:** The Ministry for the Environment. Transforming Recycling Consultation

### Contact Details:

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### Overview:

A submission on behalf of the Manawātū River Source to Sea collective of Environment Network Manawatu regarding all aspects of the given proposal.

### Background:

Environment Network Manawatu (ENM) is the environment hub for the Manawātū Region with the key purpose of facilitating and enabling communication, cooperation, and increasing collective action amongst its member groups and the wider community. ENM provides leadership by underpinning, fostering, and encouraging environmental initiatives in the region and our 60 current member groups are from throughout the Manawātū River Catchment with interests including biodiversity regeneration, freshwater management, citizen science, food security and resilience, sustainable living, alternative energies, and active transport. The network is organised into two collective focus areas: Manawātū Food Action Network and Manawātū River Source to Sea.

### Manawātū River Source to Sea (S2S)

Manawātū River Source to Sea (S2S) is a collective of ENM member groups working together with the vision of engaging the community in collective action to enhance biodiversity and the mauri of the river in the Manawātū River catchment, and to build community wellbeing. The collective is currently delivering two projects, The Plastic Pollution Challenge and the Southern Ruahine Kiwi Habitat Restoration Project.

## **Plastic Pollution Challenge**

Manawatū River Source to Sea collaborates with Massey University's Zero Waste Academy, Rangitāne o Manawatū, Te Kāuru Eastern Manawatū River Hapū Collective in Dannevirke and RECAP in Ashhurst to deliver the Plastic Pollution Challenge (PPC). This project launched in 2019 to understand the scale of plastic pollution going into the Manawatū river via our urban streams and to use this knowledge to improve the health of our local waterways. A wide range of school children, students, community members, companies, council staff and academics have been involved to date.

## **ENM's constitutional purposes are to:**

- coordinate and communicate the efforts of the member groups to enhance the local environment:
  - actively protect, maintain, restore and enhance the environment of the Manawatū
  - promote ideas to the wider community to encourage them to participate in environmental projects
  - develop concerted long-term plans of action to enhance the environment and actively progress the implementation of these plans
  - encourage the provision of “green” areas for passive recreation
  - work together to identify, initiate, support, implement and maintain environmental projects that benefit the wider community
  - initiate, develop, implement and participate in environmental education
- act as a central point of access to environmental information.
- advocate for ecological sustainability and matters of agreed environmental significance.
- work in partnership with iwi to recognise kaitiakitanga and environmental aims and objectives in common.
- liaise with similar organisations elsewhere in Aotearoa New Zealand and around the world as appropriate to source and share ideas for environmental projects and issues.

## **Submission:**

### **General comments:**

- a) The main effort needs to go into reducing waste generation rather than reducing the impacts of disposal. Recycling requires scale for efficiency so by relying on this as the solution we are encouraging the increased extraction of natural resources rather than trying to minimise the impact our lifestyle has on the natural environment. This includes reducing the generation and use of non-recyclable materials
- b) We support moving to a circular economy in New Zealand and reusing as much of our waste as possible. We also support the need for producers' responsibility to be attached to imports into New Zealand. NZ landfills are being filled with cheap imported goods not made to last. There is currently no requirement for the producers of these goods to take responsibility for their disposal. Likewise, we allow poorly made goods to be brought into NZ that don't meet Health

and Safety standards. These are then dumped in NZ rather than legislating compulsory return to the country of origin

- c) We need to ensure that the planet's resources are used wisely and sustainably. We also need to be building up natural capital to compensate for what we use. Dealing with the disposal of waste product is only part of the de- 2 intensification of GDP we need to undertake. We need reductions in the resource intensity of GDP, energy intensity of GDP and waste intensity of GDP.
- d) Garden waste needs to be treated differently from other organic waste sources. NZ has a temperate climate, so vegetation grows quickly. A small urban section needs planting to provide amenity value for both residents and neighbours, as well as maintaining biodiversity. Indiscriminate increase in green waste disposal charges will impact negatively on the built environment
- e) Little is being done to prevent increased generation of waste. Companies like Coca Cola and bottled water producers are increasing the amount of plastic waste generated. Recycling is not the solution. There is no acknowledgement with the circular economy model of the harm and risks associated with plastic at each stage of the life cycle. For example, fence posts from recycled plastic, that are seen as a sustainable product, still break down in the sun and will eventually add microplastics into new areas that were previously uncontaminated, and subsequently add them to the waterways and oceans.
- f) It takes many years to implement legislation and recycling pathways, so it is critical these are actually achieving desired outcomes. Currently local authorities are required to 'have regard to' the Waste Minimisation Act (2008). For new regulations and economies of scale to be effective there will need to be co-ordination at local authority level, so a more mandatory approach will be required.
- g) Businesses who profit from the sale of waste should be targeted. For e.g. Coca Cola who produce large numbers of plastic bottles need to cover the full cost of the life cycle of their product rather than pass costs on to the tax/rate payer.
- h) Build up a better picture and publicise just how extensive the issue of litter is in New Zealand especially in waterways. All organisations need to spend more money on surveying, monitoring and investigating offenses and making the resultant knowledge public. Manawatū River Source to Sea Plastic Pollution Challenge has carried out litter collection and analysis and made these data available. See:  
[https://www.enm.org.nz/application/files/1716/3406/7439/Final\\_PPC\\_Report\\_2020-21-compressed.pdf](https://www.enm.org.nz/application/files/1716/3406/7439/Final_PPC_Report_2020-21-compressed.pdf) 6 Grassroot community action such as the Manawatū River Source to Sea Plastic Pollution Challenge and activities such as The Rubbish Trip initiative and Zero Waste Network need support as these are effective at education and behaviour change.
- i) The powers under Section 23(1) Waste Management Act 2008 could be put into effect. Recycling labels printed on goods and packaging need to be more visible and printed in a larger

size. Disposal of the product packaging should be built into the product cost (not just the disposal of the product itself). This would help reduce the over-packaging used for marketing purposes.

- j) Any imported product that does not meet a pre-determined materials specifications needs to be returned to the country of origin at the importer's cost (not dumped in landfill). This will provide an incentive to import better quality, recyclable goods. For example, should we look at ways to prohibit exports of materials like low-value plastics? We need to process our waste in NZ rather than send offshore. This will mean we should restrict imports of plastics (and other products) to those we can recycle in NZ (unless an exemption is required for example for PPE gear in a pandemic etc.).
- k) Duty-of-care obligations need to be introduced, promulgated, and enforced. Large amounts of litter picked up from Palmerston North waterways come from businesses that don't secure their rubbish and it blows away in high winds. There need to be stronger deterrents for individuals who drop litter or fly-tip. Ways to report businesses/individuals who litter needs to be made easier. It is also possible to involving the community in clean-ups and work on education and behaviour change with initiatives such as "Fruit not Litter". As part of the Manawatū River Source to Sea Plastic Pollution Challenge six feijoa trees were planted in a section along the Te Kawanui stream that had significantly more rubbish during the second clean-up than the first from rubbish coming straight over the fences of bordering properties. By providing a more attractive environment and a source of food it is hoped people will start to appreciate and look after their immediate surrounds.

## **Container return scheme**

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

Yes

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

No. While non-watertight containers (such as coffee cups and fast-food cups) are often not 100% plastic, glass or recyclable materials and logistically may not be as easy to store and return, these are a large contributor for litter, recycling contamination and waste to landfill. This should be considered and there should be regulations around what materials these can be made from to improve end-of-life options. Vendors should be responsible for the whole cost of disposal options (including environmental impacts)

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

Yes. An alternative could be a refund amount relative to the mass of the container, with bulkier and thicker containers containing more material and being worth more. If the refund is relative to mass, the mass of empty container should be clearly labelled to avoid variance and contaminants.

**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, and donations to local community organisations/charities.

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

Yes. Non-recyclable materials should have higher costs which could potentially provide contestable funding for the research and development of new technologies to provide feasible recycling options. Beverage products with containers made from materials with no viable end-of-life options available in NZ should not be legally permitted to be imported into NZ.

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

Yes. Recyclable alternatives for freshness seals in drink containers should be included.

**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.**

n/a

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

Yes

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

Yes, but all milk beverages should be included (eg iced coffee, chocolate milk)

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

Yes. The freshness tabs from milk containers and juice products should be included in this investigation

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

Yes

**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

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

Ye. an example of a case study is Synlait with their refillable stainless steel milk containers scheme in Christchurch, and Oaklands swap-a-bottle and milk vending machines in Nelson

**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?**

Create a contestable research and development fund using CRS revenues to allow pilot trials.

**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 beverages containers would be 3 litres and smaller?**

No. This is positive in that it incentivises bulk purchasing to reduce plastics and lower the risk of littering (unless disposable cups are used to consume the beverage) but does not incentivise the recycling of this sized container. Due to the bulky nature of containers >3L, (which contain mostly air), these will take up large amounts of space in recycling bins leaving less room for other recyclable waste. While larger containers are less common, it would be valuable to provide a way for them to be recycled through similar means, such as over the counter. As these containers would have a larger mass of material, it would be worth investigating the option of payment per mass of container, with the mass of empty container clearly stated on the label.

**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?**

Returning containers with lids on should be encouraged, but not enforced. If a consumer loses or misplaces a lid and lids on is a requirement, the container will effectively become worthless to the consumer and has a higher chance of ending up in landfill or being littered.

**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?**

Yes. Charitable schemes such as metal lids for Kidney Kids Kan tab NZ could be offered to collect beer/wine bottle lids. Sale of beverage containers that cannot be put back on containers (excluding metal lids) should be regulated.

**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

**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.**

1. Supermarket
2. Community recycling/resource recovery centre
3. Other community centres/hubs (e.g. town hall, sports club, etc
4. Local retail outlets that sell beverages (e.g., dairy, convenience store, bottle shop,
5. petrol station)
6. Other (please specify) – Environmental hub/centre e.g. Environment Network  
Manawatu
7. Shopping centre/mall
8. Waste transfer station
9. Commercial recycling facility (e.g. depot, more likely to be located in industrial zone)

**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?**

Yes. It should be mandatory that Any brick-and-mortar store that sells beverages in closed containers are required to take back containers. This will exempt mobile stores (e.g. food trucks, market stalls). Case-by-case exemptions should be made for situations where health and safety concerns may be present due to tripping hazards or hygiene from storage of containers.

**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?**

Yes. There should be a requirement for at least 1 drop off point to be accessible within a reasonable distance of all NZ residents that may require it. This brings the opportunity for non-beverage selling vendors or organisations to become a contracted depot if there are no other eligible retailers to take back containers.

**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.)**

Case-by-case exemptions should be made for situations where health and safety concerns may be present due to space limitations resulting in tripping hazards or hygiene issues from storing containers.

**24 Do you agree with the proposed 'deposit financial model' for a NZ CRS?**

Yes. Any deposits collected by the CRS that are 'lost' or not refunded by consumers should be used to provide contestable funding for product stewardship programmes or R&D to develop strategies to recover more containers, trials of refillable containers or developing new recycling technologies.

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

Yes. Any profits should be returned to the community or used to provide contestable funding for product stewardship programmes or R&D to develop strategies to recover more containers, trials of refillable containers or developing new recycling technologies.

**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

**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

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

Yes

**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.**

n/a

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

n/a

**Improving household kerbside collections**

**Proposal 1: Collecting a standard set of materials**

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

Yes. In most cases the scales of economy would improve the financial viability of freighting the materials to the region which can process them (if local options for recycling are not available). Infrastructure to improve freight efficiency (i.e. pre-sorting and compaction) should be implemented where necessary.

However, there may be case-by-case situations where any environmental benefits from collection are outweighed by the environmental impact and carbon emissions produced by delivering it to another region where it can be processed. These situations should undergo investigations to establish and deliver local solutions allowing the material to be collected with a net positive environmental impact, even if this means operating at a loss financially.

If niche processes are present in one region allowing materials above the standard list to be recycled within the region, there should be a pathway for the material to be collected through



the region's council where feasible and the process/business be supported in scaling to a size where national recycling of the material may be possible. This will promote the development of new innovative technologies that can help recover materials that are currently unable to be recovered through mainstream recycling and processing methods.

**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. This may not be an issue for residents who remain in one region for long periods of time, but transient residents and visitors might be confused and contaminate recycling streams. A standard set of materials would allow nation-wide government driven education, which may be more efficient than regional education attempts.

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

Regulation may be required, as current infrastructure may not allow specific regions to collect specific materials. Imposing a regulation would result in capital being spent to upgrade recovery centres to allow sorting and processing of recoverable materials, rather than opting out due to cost or convenience.

**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.**

YES - glass bottles and jars

YES - paper and cardboard

YES - pizza boxes

YES - steel and aluminium tins and cans

YES - plastic bottles 1 (PET) and 2 (HDPE)

YES - plastic containers and trays 1 (PET) and 2 (HDPE)

YES - plastic containers 5 (PP)

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

No

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

Soft plastics, shopping bags and Plastic 4 (LDPE). There are viable end-of-life options through recycling, which are not necessarily profitable but better than landfilling.

Aluminium foil and trays (if clean) – they have a sustainable end market

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

Yes. This will encourage new technologies to be developed. This may be more important for small recyclers and deep-tech recycling start-ups that may already be priced out of entering the

market, as regulatory barriers would prevent these new technologies reaching markets and becoming viable end-of-life options.

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

YES - sustainable end markets

YES - end markets solutions are circular and minimise environmental harm

YES - viable processing technologies

NO - processing by both automated and manual material recovery facilities

NO - no adverse effects on local authorities, including financial

YES - supply chains contribute appropriately to recovery and end-of-life solutions for their products

• other (please specify)

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

NO - the responsible Minister

YES - Ministry for the Environment staff in consultation with a reference stakeholder groups

NO - existing Waste Advisory Board

YES - an independent board

• other (please specify).

This should not be decided by a board, industry body or single Minister as these could lead to lobbying, exploitation, corruption, and formation of monopolies. Consultation with reference stakeholder groups, contractors and independent boards should be involved in discussions with MFE.

Avoid business lobbyists that only advocate for the waste disposal industry. Involve non-governmental organisations and community initiatives such as The Rubbish Trip and Sustainable Coastlines. To get independent expert advice funds need to be put into training and employing experts.

**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.**

Yes.

**Proposal 2: All urban populations should have kerbside food scraps collection**

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

Yes. To recover the energy and nutrients where possible, and reduce GHG emissions and leachate production in landfills.

**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?**

Yes, but promote alternative solutions for different communities that should be determined on a case-by-case basis, as each region has unique circumstances and infrastructure. Dense suburban areas may benefit from communal organic bins or communal automated composting facilities. suburban areas may be better suited to weekly collections. Regional areas may be better suited to subsidised home-compost facilities. Strategies should be individually led by each council and based on outcomes which should be regularly audited.

**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?**

Yes, but promote alternative solutions for different communities that should be determined on a case-by-case basis. There should be mandatory targets for organic waste to landfill, but leaving the option of alternative means to reach this target. Some areas may have existing infrastructure, or be able to provide the same outcome using their own strategy other than weekly kerbside collections. Residents with limited access to or not interested in community alternatives to kerbside collections should have the option to have it collected at their kerbside.

**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?**

YES - Offering a subsidised user-pays green waste bin?

YES - Making it more affordable for people to drop-off green waste at transfer stations

NO - Promoting low-waste gardens (e.g., promoting evergreen trees over deciduous)? –  
**(Biodiversity is important)**

- Other (please specify)?
- Promotion of and subsidised home-composting/worm farm equipment
- Implementation of automated communal recycling facilities

**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?**

Yes. However, there should be an option to opt out of the service for residents that already have alternative solutions in place.

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

- no, it should be sooner.

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

- yes, that's enough time

**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
- Hampton Downs – Waikato
- Mynoke Vermicomposting site – Taupō
- Enviro NZ – new facility planned for the Bay of Plenty in 2023
- Living Earth – Christchurch
- Timaru Eco Compost Facility – Timaru.

n/a

**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
- compostable bin liners
- tea bags.

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

n/a

**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.**

**YES - products help divert food waste from landfills (i.e.. Non-plastics, cardboard box or paper bag full of food waste)**

**NO - products meet New Zealand standards for composability (This standard is not rigorous enough, and there is no standard for plastics)**

**YES - products are certified in their final form to ensure they do not pose a risk to soil or human health**

**NO - products are clearly labelled so that they can be distinguished from non compostable products (NZ composting standards are not rigorous enough to determine if these labels will be accurate or not)**

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

NO - producers and users of the products and packaging contribute to the cost of collecting and processing **(if the product is non-organic, an alternative solution should be proposed for these on a case-by-case basis)**

**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.**

n/a

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

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

Yes

**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?**

Yes

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

Yes

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

List of most common contaminants, to help raise awareness and establish strategies to minimise contamination

### **Proposal 4: Setting targets (or performance standards) for councils**

**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)?**

Yes

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

Yes

**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?**

Yes. However, there should be incremental milestones targets to achieve between now and 2030

**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?**

Yes

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

No. The target should be 80%. Having a higher target will create greater urgency in the drive for change, so 70% will more achievable than setting 70% as the initial target.

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

Nationwide public awareness of the inability to meet MPS, and investigation/consultation into why the target was not achieved. Support to achieve the target should be provided if minimum standards are not achieved due to lack of resources. In the case of a minimum performance standards not being achieved due to negligence then a financial penalty should be enforced.

**Proposal 5: Should glass and/or paper/cardboard be collected in separate containers?**

**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?**

- separated, but councils choose which one to separate

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

- begin immediately

**Proposal 6: Should all urban populations have access to a kerbside dry recycling collection?**

**64 Should all councils offer household kerbside recycling services?**

Yes. They should also provide an “as required” service for residents to arrange pick up of bulky recyclable materials that do not fit into bins.

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

Yes

**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

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

Waste audits, education around what is recyclable and why, education in schools and behavioural studies on fly-tipping and littering.

**Separation of business food waste**

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

Yes

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

No. It should be sooner for those in regions that have suitable infrastructure/processing facilities

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

Yes

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

Yes

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

No

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

Workshops focusing on how to minimise waste.

Encouragement towards projects of upcycling food waste and by-products

Funding for waste audits

Funding and resources for environmental impact assessments and carbon emissions

**This submission is supported by Precycle NZ. [www.precycle.co.nz](http://www.precycle.co.nz).**

