

18th May 2017

Wellington City Council

By email: wasteplan@wcc.govt.nz

DRAFT WELLINGTON REGION WASTE MANAGEMENT AND MINIMISATION PLAN

Thank you for giving the Packaging Council (PAC.NZ) the opportunity to make comment on the above draft plan.

The purpose of PAC.NZ is to represent the packaging industry as a key sector in the New Zealand economy, one that improves the utility and safety of products and underpins producers and manufacturers efforts to 'add value' in an export-dependent economy. Independent analysis by KPMG puts the value of the New Zealand packaging industry at \$3.9 billion and Infometrics data shows that over five thousand businesses support 49,000 employees, with the Wellington region being the third largest for business units behind Auckland and the Canterbury region. The packaging industry in New Zealand is constantly innovating to create the features and benefits we demand from packaging such as improved functionality, customer preference, safety, design for dexterity, portion control for health benefits, product wastage prevention and enhanced environmental characteristics including impacts for end-of-life solutions such as lightweighting, design changes to optimise recyclability and material changes.

GENERAL COMMENTS

- 1.1 We support the overall intent of the plan to reduce unnecessary waste to landfill.

- 1.2 We support the intent of the plan for the councils in the Wellington region to potentially work together more, and jointly deliver best practice waste and recycling services with a focus on efficiencies, cost saving and optimisation of the recovery fleet.

- 1.3 We support the intent of the plan to collaborate with other local government organisations, NGOs, and other key stakeholders on undertaking research, lobbying and actions on various waste management issues.



SPECIFIC COMMENTS

- 2.1 We are concerned that in your considerations you have not included litter abatement, nor included the Litter Act in your legislative considerations. Litter is a significant social issue and the impact of fugitive materials raises environmental issues for the Wellington region such as plastic in the marine environment. Since the plan draws particular attention to containers and plastic bags which it is acknowledged, when discarded carelessly (littered), present a hazard in the natural environment we find this omission at odds with the intent of the plan *“to deliver more consistent and effective forms of regional communications and education around waste services and waste minimisation, so households and communities are inspired and supported to play their part.”*
- 2.2 We also have concerns that drawing particular attention to specific items in the waste stream, such as containers, plastic bags, e-waste, noting the *“not limited to”* comment, has the potential to create a platform for opportunistic ‘cherry picking’ of specific waste streams, based on ‘popular demand’ rather than evidence-based facts. We would further make the points that the implementation of ad-hoc schemes is potentially resource inefficient across a whole raft of life-cycle environmental indicators and fragmentation of the overall waste and recycling recovery systems compromises the economic value of the entire system which we believe would be contrary to the vision of the councils in the Wellington region to focus on efficiencies, cost savings and optimisation of the recovery fleet.

RECOMMENDATIONS

- 3.1 A significant opportunity for improving kerbside recycling and avoiding unnecessary waste to landfill lies with the design of the recovery systems. Globally, recovered materials have to compete against the quality and cost of virgin materials. Co-mingled waste streams suffer from unnecessary wastage and associated loss of value due to cross contamination with other recovered materials compromising the cost effectiveness of the overall recovery system.
- 3.2 PAC.NZ and its members the share the same objective as the councils in the Wellington region to improve the region’s recovery and recycling systems. So we are particularly pleased to see that this plan is keen to engage across all stakeholders. PAC.NZ advocates for inclusive debate on waste issues across central government, local government, industry and communities, so it can be determined what intervention is required and where, what resources are already in place, provide analytical assessment if these resources are enough, and if not, establish what else is required and from whom. We believe that our position is aligned to the vision in this plan.
- 3.3 We would be happy to speak to our comments should the opportunity arise.

Sharon Humphreys

Executive Director, Packaging Council of New Zealand Inc.